

## **Stevenage Local Plan Statement: Stage 3**

### **Statement from Graveley Parish Council**

#### **Matter 17- Gypsies and Travellers**

#### **Statement by Jack Rigg, Chair, Graveley Parish Council**

**Question 1. Does the Council's approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites (August 2015)? If not, why not?**

***Graveley Parish Council does not consider that the Council's policy conforms to the expectations of Planning Policy for Traveller Sites. HP6 (Gypsy & Traveller Accommodation Study – 2013) recommends a total of 3 new pitches to 2018 (which we believe is not justified) and while discussing methodologies to assess future pitch requirements beyond 2018 recommends further analysis is required to justify such a recommendation. We do not believe this analysis has not been undertaken to justify creation of a new site for 11-16 additional pitches.***

***Paragraph 7 (c) of Planning Policy for Traveller Sites 2015 (PPTS) requires the Council use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions. Based on the following the Council has failed to demonstrate this.***

#### **1. Calculation of the Number of Pitches required to meet future need.**

1.1. As noted in the Strategic Policies section of the Local Plan 5.83, "*There is some uncertainty around the precise level of future requirements because of the small size of the existing community and the difficulties of projecting their needs over a long time period*". It is therefore by no means certain that a requirement for an 11-16 pitch site will ever exist in the future.

1.2. Table 5-6, page 34. The Need for Additional Permanent Pitches 2013 – 2018, (Gypsy & Traveller Accommodation Study – 2013), Examination Library Document HP6, concludes that there is a Net Need for 3 New Pitches to 2018. This figure however ignores the fact that of the 4 potential new household formations, 2 intend to be accommodated on existing pitches. This would therefore reduce the Net Need for the period to 2018 to 1 pitch.

NB The foregoing also ignores the fact that all 4 individuals have expressed the desire to move to East Herts.

1.3. The policy of assuming all newly formed households will remain in Stevenage could lead to double counting of future requirements. East Herts in assessing their future need assumes that of any new household formation from within the existing community that 50% would move out of area (ORD6 *East Herts Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, May 2016, paragraph 1.10, page 4*) a reduction of 2 pitches in this instance.

1.4. In determining Future Need for the years 2019-2031, paragraph 5.7.4 of Gypsy & Traveller Accommodation Study – 2013 (HP6), suggests a figure of 3-5 new pitches per 5 year period to be appropriate, a total of 6-10 pitches to 2028. This figure is however heavily caveated by the fact that there is no data upon which to base projections of future need.

1.5. In support of the 11-16 estimate paragraph 5.4.15 Gypsy & Traveller Accommodation Study – 2013 (HP6) states that "National experience of future household growth has been 4% to 5% per annum which if applied to a full site of 17 households, would be 4 to 5 pitches over five years, similar to the identified survey need."

Evidence detailed in a report ORD7 prepared by *Opinion Research Services for North Herts District Council (NHDC) entitled Gypsy, Traveller and Showperson Accommodation Update July 2014, paragraph 3.23, page 18*, to support NHDC's Local Plan (relevant extract detailed in Appendix 1 attached) argues that the historical guideline of 3% for future household formation is too high and that a rate of 1.5% to be more appropriate nationally. For NHDC the report has applied a figure of 2.5% to reflect the relatively high number of young children within NHDC's traveller community. On this basis, on a compounded basis, NHDC's traveller community is predicted to grow by 45% over 15 years.

Given that Stevenage's traveller community also contains a relatively high number of young children we believe a 2.5% growth rate to be appropriate. This would equate to a need for an additional 7 pitches over 13 years from 2019 to 2031. A 3% growth rate would generate a need for an additional 8 pitches.

1.6 In determining the Net Additional Permanent Pitches requirement very conservative assumptions have been used, which have the effect of ballooning the level of pitches required. We consider a total of 8 pitches to 2031 to be appropriate.

## **2. Gypsy and Traveller Site Search.**

2.1 We have concerns regarding the site assessment methodology given that Site 13, Land west of Stevenage, (58.23 hectares) and site 14 (32.42 hectares) have been assessed as able to accommodate only 5 pitches each (Gypsy & Traveller Site Search, 2014 (HP4)), but suitable for a 1,350 housing development. Whereas the HO12/1 site (1.38 hectares) has been assessed as capable of accommodating between 11-16 pitches.

2.2. Gypsy & Traveller Site Search, 2014 (HP4) in discussing a possible extension of the Dyes Lane site via an additional site in close proximity to the existing traveller's site in paragraph 3.26, page 17 stated that, "it is considered that any new site should not exceed the number of pitches (i.e. 5\*) that might be delivered as an extension to Dyes Lane. This is to avoid concentrating all of the Borough's existing and future Gypsy and Traveller provision in a small area." (\* inserted to provide clarification).

The above is in stark contrast to a conversation with a Senior Police Officer who stated that logically it would be preferable for all traveller provision to be in a

single locality to facilitate the provision of services and management of any issues which might arise.

2.3. The Recommendation section of Gypsy & Traveller Accommodation Study – 2013 (HP6), paragraph 6.1.5 (page 36), identifies a need for 3 pitches to 2018 but in paragraph 6.1.6, dealing with future permanent pitch requirements beyond 2018 states that “More detailed analysis is required to be able to justify additional permanent pitches as this small level of need may be able to be addressed by transit site provision to cover the combined County area.” The report does not recommend the creation of 11-16 pitches. No justification other than the Gypsy & Traveller Accommodation Study – 2013 (HP6) to support the need for additional traveller pitches would appear to have been undertaken.

2.4 In ED123 Housing Technical Paper, Stevenage Council state the report (Gypsy & Traveller Accommodation Study – 2013: HP6), paragraph 4.3, page 25 recognised two potential sites that met the broad tests of suitability and availability for Gypsy and Traveller use. These two possible sites, 13 and 25 (Gypsy & Traveller Accommodation Study – 2013 (HP6), are identified as suitable to meet additional traveller need. Neither of these sites are in green belt. This compares with the proposed site, HO12/1, Land North of Graveley Road (site 23) in green belt and its non-deliverable status and as such was not considered as a suitable site.

2.5. In table 17 of ED123 Housing Technical Paper, Stevenage Council in explaining their decision not to take Land west of Stevenage (site 13) forward stated that “*The promoters of this scheme previously objected to the extension of the existing site at Dyes Lane on the basis it could prejudice the realisation of the wider development.*”

It would be helpful if Stevenage could clarify the basis on which the developers consider that the extension of the Dyes Lane site could prejudice the realisation of the wider development as in Document ED150 (SoCG between Stevenage Borough Council and Taylor Wimpey and Persimmon (West of Stevenage), point 12, the developers “confirm that the development of Stevenage West (HO2) is viable”.

2.6. Under point 14 of ED150, the parties “*agree to work together to ensure the deliverability of this site. Both parties agree that further work is required to try and resolve issues relating to the land ownership, particularly in relation to the land controlled by the Homes and Community Agency (HCA) if possible.*”

Please can Stevenage advise what the issues are with the land controlled by HCA, how it might impact the development of HO2 and how they envisage resolving it?

2.7. Setting the future pitch requirement at 11-16 rather than the lower more realistic figure of 7-8 has the effect of disqualifying other more suitable and available sites, including sites 13 and 14 which would permit a splitting of the current site to create two separate sites to house the two distinct traveller groups currently occupying Dyes Lane.

### 3. Other Issues

3.1. We were concerned to learn at the Hearing on Wednesday 18<sup>th</sup> January that it is proposed to transfer part of the existing traveller community at Dyes Lane to the new site. This is contrary to the stated purpose for the proposed increase in new pitches, which is being sought to accommodate future need.

3.2. Herts County Council (HCC) currently manage the County's traveller sites on a No Cost basis to the authority itself, that is rents from the sites managed cover the cost of management and administration of the sites. Transferring some 50% of Dyes Lane occupants away from the site could result in the site becoming uneconomic and therefore subject to closure at some point in the future. In that eventuality it is probably that some or all of the remaining travellers at Dyes Lane will need to be found pitches at HO12/1. This would of course achieve the objective of point 14 of ED150.

It is our understanding that it is HCC policy not to take on the management of any new sites.

3.3. In response to a local resident objection to HO12/1 site on the grounds that it would lower house prices Stevenage responded that house prices are not a planning consideration.

Stevenage has justified its rationale for not locating any new site at/near to Dyes Lane as being due to developer concerns that to do so might prejudice the realisation of the wider development.

It is therefore very important to clarify just what the basis of developer concerns are in objecting to a further expansion of Dyes Lane and their agreement with Stevenage under point 14 of ED150 to seek to address ownership issues relating to HCA land ownership.

3.4 **Conclusion:** Given the issues raised above regarding calculating current and estimating future need, coupled with concerns over the rigour of the methodology employed in assessing possible traveller sites we do not believe that the conclusion reached in ED123, paragraph 4.16, page 27 is justified.

#### **Question 4. Is the proposed site in a sustainable location?**

***Graveley Parish Council (GPC) does not consider the location of a traveller's site at HO12/1 to be justified or consistent with national policy for the following reasons. This view is confirmed by a Report by Bob McQuillan, MRTPI MRICS, RTPI Chartered Town Planner detailed in the attached Appendix 2 A.***

4. Location of a traveller's site at HO12/1 will have a **"severe impact" on the local road network.** As such the proposed development is not sustainable.

4.1 HO12/1 is located on the B197 Graveley Road between the A1(M) junction 8 and the Graveley Road /North Road junction. As noted in our response to Matter 16, paragraph 2, both these junctions have been identified as problem junctions requiring upgrading. Heavy traffic volumes are experienced between these two

junctions, any disruption from the proposed traveller's site would have a "Severe Impact" (NPPF 32) on traffic movement to/from both junctions.

4.2 The Graveley Road / North Road junction is currently classified by Herts Highways as a hazardous junction due to the frequency of accidents requiring the attendance of the emergency services. On page 70 of the AECOM Technical Note dated 22/9/2016, ORD5 (see attached Appendix 2B), the Graveley Road/ North Road junction is described as follows;

*"The B197 is the main road linking Stevenage, A1(M) junction 8 and Baldock. The priority junction has been identified as problematic in the AM peak as large queues and delays occur on the junction approaches and North Road traffic is opposed by large volumes of traffic using the B197".*

4.3 Proposed development under both Stevenage and NHDC's Local Plans will increase traffic congestion significantly (please see our response to Matter 16). Proposed improvements to the A1(M) and the local road network are required to address current congestion issues and may result in some limited improvement but this will be constrained by the restricted nature of the local road network itself.

5. HO12/1 is described in the Gypsy & Traveller Site Search, 2014 (HP4) as making a **significant contribution to Green Belt**, as such development of HO12/1 constitutes inappropriate development which is by definition harmful to the green belt and should not be approved except in very special circumstances (NPPF 87). This the Council has failed to demonstrate.

5.1. Pursuant to the NPPF guidance notes Paragraph: 034 Reference ID: 3-034-20141006 " Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."

5.2. Utilisation of this site would require an amendment to the green belt boundary. This would require exceptional circumstances be demonstrated (NPPF 83). This the Council has failed to demonstrate.

6.1. **The site is non-deliverable.** Gypsy & Traveller Site Search, 2014 (HP4) confirms the land owner is unwilling to release the land. This is contrast to the site 13, Land West of Stevenage where a land owner is willing to make land available.

6.2. As Herts County Council has stopped taking on responsibility for the management of new Traveller sites who will manage the new site if approved? The latter was given as one reasons in ED123 (Housing Technical Paper Update 2, December 2016) page 26 for not proceeding with Land West of Stevenage, site 13 due to concerns regarding uncertainties surrounding the current site owner's willingness to take on management responsibility for any extension.

7. Currently the Graveley Road forms a strong boundary for the green belt. Development of the proposed traveller's site would breach that boundary and

open up the possibility of future development of the green belt. It would also increase the risk of coalescence of Graveley with Stevenage.

8. In its Local Plan in regard to HO12/1, Stevenage advise that No Police Objections were received to the proposed allocation. Please can Stevenage confirm

a) were the police asked specifically regarding the traveller policy or was it that no comment was received regarding the Local Plan itself and

b) which police forces within Hertfordshire were consulted?

**Question 6. Would the site dominate the nearest settled community?**

***Graveley Parish Council considers that the location of a Traveller site at HO12/1 would dominate our village community for the following reasons.***

9. HP4 page 47 states that HO12/1 is 1,000 metres from Graveley School. This is incorrect, it is in fact some 500 metres from the site to Grinders End where the school is located. The close proximity of a traveller site to a small village of some 170 houses is contrary to Planning Policy for Traveller Sites Policy C, 14. The proposal for an 11-16 pitch site equates at its maximum to 32 caravans, equivalent to some 20% of the village and as such would dominate it.

Additionally the site would also be in close proximity to the Cygnet Hospital, new proposed housing developments (SBC + NHDC: north of Stevenage) and the proposed new supermarket.

9.2. The site would also have a significant adverse impact on Graveley Village School (90 pupils), particularly if the occupants of the site were to evidence a similar age profile, once full, to that at Dyes Lane where 23 of the 50 occupants were aged 1 to 10 when the survey of Future Traveller Requirements was undertaken. (Gypsy & Traveller Accommodation Study – 2013 HP6 page 20).

9.3 The footpath between Graveley Village and Sainsbury supermarket runs very close to the proposed site and it is likely that locating a traveller's site close to the path will discourage future use, requiring villagers who previously used the footpath to shop at Sainsburys to go by car.

Graveley Parish Council, February 2017.

Attachments :

Matter 17, Appendix 1 (extract from ORD5 "Opinion Research Services for North Herts District Council (NHDC) entitled Gypsy, Traveller and Showperson Accommodation Update July 2014")

Matter 17 Appendix 2A: Report By Bob McQuillian, MRTPI MRICS, RTPI Chartered Town Planner.

Matter 17 Appendix 2B (extract from ORD5, Page 70 of the AECOM Technical Note, North Herts, Preferred Local Plan Model Testing – Problem Locations, dated 22/9/2016, the Graveley Road/ North Road junction)