

## **Haringey Site Allocations DPD Consultation**

**31 March 2015**

### **London Gypsy and Traveller Unit**

We wish to make the following comments on the Haringey Site allocation DPD Consultation document, in reference to the policy approach to meeting the accommodation needs of the Gypsy and Traveller community.

In our view the policy position on Gypsy and Traveller site provision is not clear. Firstly, as a site allocations policy it is included under SA2 'Changes to designated employment areas'. This is not appropriate because Traveller sites are a type of accommodation and should be considered as such in policy terms. At the moment the way the policy is set out suggests that Gypsy and Traveller pitches are somehow related to employment land provision. Therefore we would recommend a new policy is introduced, SA3 which deals specifically with Gypsy and Traveller site allocations. This policy can include the suggested wording on accommodating new provision on industrial land which is being re-designated.

At the moment, the policy approach to Traveller provision seems to be that only industrial sites which are being released will be considered for meeting the needs of this community. We would argue this is not sufficiently robust and the Local Plan should provide a range of options to ensure greater flexibility. We are aware that other community organisations in Haringey are opposing the release of industrial land as this threatens the livelihood of the borough's local economy. Policy SA2 does not clearly state which industrial sites might be considered for Gypsy and Traveller provision and how pitch provision might be incorporated on these sites in a balanced way which protects existing employment.

The council needs to ensure these sites are suitable for residential use and provide high quality amenities. Traveller sites need to be located in safe surroundings to ensure children playing or going to school are not put in danger by traffic and large vehicles. Given the character of caravans and mobile homes, there should be an extensive assessment of noise and air pollution which might occur in the vicinity of industrial/employment activities. Another issue to consider is the contamination of land which might prove a risk in this case.

We are keen to discuss with the council about this approach and explore the possibilities of including Gypsy and Traveller pitches in mixed use schemes. The most important concern would be to create a residential character as part of any such development.

However, as said previously we believe there should be a wider range of options for suitable Traveller site locations, to ensure the mitigation of constraints in case these B2/B8 sites cannot be released or landowners are not willing to lease them for Traveller provision. Sites in the SA DPD allocated for residential development should also be included as possible GT site locations, and the council should also look at providing a small number of pitches on larger residential led mixed use schemes. This could be treated as any other affordable housing provision when negotiating large scale planning applications.

We would recommend the following sites are assessed for suitability to provide Traveller pitches, but other sites in the SA DPD where planning decisions are yet to be made should also be considered. We have looked mainly at sites in (part) public ownership, large sites which could accommodate a small number of pitches as part of other development, sites where reduced heights/densities are recommended and estate renewal schemes.

SA5- Clarendon Square

SA7 – St Luke’s Hospital

SA10 – LBH Civic Centre

SA12 – Wood Green Bus Garage SA26 – Clarendon Square Gateway

SA27 – Clarendon Road South

SA29 – L/a Coronation Sidings

SA32 – St Ann’s Hospital

SA45 – Highgate Bowl

SA50 – Chettle Court

SA52 – Pinkman Way SA53 – Cranwood and St James School

SA54 – Tunnel Gardens

SA57 – Park Grove and Durnsford Road

SA63 – Broad Water Farm Area

We are aware that the site allocations process is dependent on the results of the Gypsy and Traveller Accommodation Needs Assessment; however we would urge the council to conduct an appraisal of these sites in parallel with finalising the GTANA, to ensure a robust and inclusive process, where actual Traveller site options are being considered alongside other uses from the beginning.

The council needs to ensure that meaningful collaboration is taking place on the matter of Traveller site provision, not only with neighbouring local authorities and other stakeholders, but more importantly with the local Gypsy and Traveller community and support groups. The Traveller community has a very good knowledge of the borough and they would be the best placed to give their views on the suitability of sites. Moreover, they would be able to suggest how certain development constraints could be mitigated.

We will seek to arrange a meeting with the planning policy team and members of the Traveller community to discuss these matters and agree on a robust and collaborative process to ensure the plan will be sound by submission stage.