



**EXAMINATION OF THE HARROW LOCAL PLAN 2021-
2041**

HEARING STATEMENT

**MATTER 5 (PART 2): AFFORDABLE HOUSING AND OTHER
HOUSING MATTERS**

ISSUES 9, 10 AND 11

5 June 2025

Matter 5 (Part 2): Affordable housing and other housing matters

Issue 9: Whether the approach to Affordable housing is justified, positively prepared, consistent with national policy and in general conformity with the London Plan

Questions: Policy H04 – Affordable housing

- 9.1 EBH02 identifies the affordable housing need for the borough as 2,729 households needing affordable housing over the 20-year period 2021-41, or a rate of 136 per annum. Will the plan deliver sufficient affordable housing to meet this identified need, and should this need be reflected within the policy wording?**
- 9.1.1 Table 54 of the Local Housing Needs Assessment (LHNA) (ENH02) indicates an affordable housing requirement of 7,870 dwellings over the 20-year period (representing just under 50% of the overall housing requirement) and the plan will deliver sufficient affordable housing to meet this need. It is considered the policy as drafted (with reference to the ‘boroughwide target of 50% affordable housing’) is effective as it reflects the drafting in London Plan Policy H4 Delivering affordable housing.
- 9.1.2 Table 43 of the LHNA indicates that a total of 2,729 additional households will require affordable housing between 2021-41, or at a rate of 136 per annum (figure 43). This figure is based on an assessment of those households, who are unable to afford housing costs (. i.e. rent). This is however only one element of overall housing need, and the assessment clarifies the overall future affordable housing need between 2021-41 is comprised of existing and future households, who are unable to afford market rents or aspire to homeownership. The rest of Chapter 4 outlines the process of establishing that need.
- 9.1.3 Chapter 5 of the LHNA sets the overall housing need, including establishing the Housing Target. For the purposes of the draft Local Plan, specifically Policy SP3, Figure 54 identifies the overall dwelling need for Affordable Housing and Market Housing, and breaks this down by property size, based on the overall housing requirement of 16,040.

Figure 54 Overall Dwelling need for Affordable Housing (including households aspiring to home ownership) and Market Housing by property size based upon the GLA Capacity Target of 802 dpa for 2021-41 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

| | Affordable Dwellings | | | Total Affordable Housing | Total Market Housing | Total Housing |
|------------------|----------------------|--------------------|---------------------------|--------------------------|----------------------|---------------|
| | Unable to afford | | Affordable Home Ownership | | | |
| | Social rent | London Living Rent | | | | |
| 1 bedroom | 40 | 18 | 435 | 493 | 173 | 665 |
| 2 bedrooms | 1,568 | 380 | 662 | 2,611 | -51 | 2,560 |
| 3 bedrooms | 2,627 | 661 | 43 | 3,330 | 5,424 | 8,754 |
| 4+ bedrooms | 1,160 | 234 | 42 | 1,436 | 2,362 | 3,798 |
| DWELLINGS | 5,395 | 1,293 | 1,182 | 7,870 | 7,908 | 15,777 |
| C2 Dwellings | - | - | - | - | 263 | 263 |
| LHN | 5,395 | 1,293 | 1,182 | 7,870 | 8,170 | 16,040 |

- 9.1.4 Therefore, in line with the London Plan and the Council's evidence base, Policies SP3 and HO4 seeks to ensure 50% of all new housing delivered consist of affordable housing, with a 70:30 split between low cost rented housing (including social rent) and intermediate housing (which includes London Living Rent as per London Plan Policy H6 Affordable Housing Tenure). This reflects that of the overall housing requirement of 16,040 dwellings, 7,870 dwellings (49%) are affordable housing tenure and the balance of 8,170 dwellings (51%) is market housing tenure. Within the affordable housing requirement of 7,870 dwellings, 5,395 dwellings (69%) are social rent and the balance of 2,475 dwellings (31%) is intermediate tenure (London Living Rent / London Shared Ownership).
- 9.1.5 Sufficient sites have been identified to meet the overall housing requirements and Policy SP3 sets out the requirement for 50% of all new dwellings will be affordable and HO4 provides the detailed mechanisms for achieving this. The 50% requirement has been subject to viability testing.
- 9.1.6 The approach to drafting (with reference to a boroughwide target of 50% of all new housing) is consistent with the London Plan (Policy H4 Delivering affordable housing).
- 9.1.7 The Local Plan monitoring framework includes key indicators and targets to monitor the effectiveness of the policies to increase the provision of affordable housing and right tenure, to address future housing needs.

9.2 Is the approach to affordable housing as identified at policy H04 consistent with London Plan Policy H4?

9.2.1 Yes, the approach to affordable housing identified in Local Plan Policy H04 is consistent with London Plan H4. The overarching target (50%), the threshold approach (including additional requirements for public sector / industrial land), tenure split, use of grant to increase affordable housing, and the priority given to provision of affordable housing on-site are all consistent with London Plan Policy H4. The Mayor of London has raised no general conformity issues in relation to this policy.

9.3 Is the tenure mix identified at part G of the policy justified and supported by the evidence base?

9.3.1 Yes, the tenure mix identified at part G of the policy is justified and supported by the evidence base.

9.3.2 A Local housing needs assessment (ENH02) has been prepared. Table 54 of that assessment indicates the overall dwelling need and the split between market and affordable housing and within the affordable housing tenure, the split between low cost rented, and intermediate tenures. Within the affordable housing requirement of 7,870 dwellings, 5,395 dwellings (69%) are social rent and the balance of 2,475 dwellings (31%) is intermediate tenure (London Living Rent / London Shared Ownership). This is equivalent to the affordable housing tenure mix of 70: 30 between low cost rented housing and intermediate products set out in Local Plan Policy HO4G.

9.3.3 The Local Plan Viability Study (2024) indicates the proposed affordable housing target (assuming a 70: 30 split between Social rented: low-cost ownership housing) is broadly deliverable over the Plan period (EBLE02).

9.3.4 London Plan Policy H6 Affordable Housing Tenure requires that both low cost rented tenure homes and intermediate tenure homes are a minimum of 30% each of new affordable housing, with the remaining 40% being a tenure determined by the LPA based on local needs. As noted above, the Harrow LHNA indicates that 70% of new homes should be low cost rented tenure and 30% should be intermediate tenure. The proposed tenure mix in part G is therefore justified as it reflects the minimum 30% requirement of the London Plan for intermediate tenure, and allocates the 40% 'flexible' tenure to the minimum 30% low-cost rented tenure to give an overall 70% target for that tenure, as identified in the evidence base.

9.4 Is the policy justified by prioritising the delivery of social rented housing over other affordable products as set out at part H of the policy?

- 9.4.1 Yes, prioritising the delivery of social rented housing over other affordable products as set out at part H of the policy is justified.
- 9.4.2 The LHNA (Figure 54) indicates there is a higher level of need for social rented housing than other affordable products. The Local Plan viability assessment indicates it is broadly viable to deliver affordable housing with a 70:30 split where the 70% low-cost rent is assumed to be at social rent levels. Figure 51 of the LHNA provides further granular information with respect to the different tenures within the overarching 'low-cost rent tenure' (namely social rent and affordable rent). It indicates that only a very small proportion of households can afford the more expensive affordable rent tenure (164) compared to those that can't (5,114, being 3,728+1,386). In this context it is justified to give priority to social rent tenure.

9.5 Part H (d) refers to evidence of 'meaningful discussions with Registered Providers'. How will this be assessed and is this wording clear to a decision maker?

- 9.5.1 This would be assessed through material submitted at the application stage, including the Design and Access Statement, Planning Statement, and Affordable Housing Statement. These documents would set out how the design has developed (including consideration dwelling size mix and design issues relating to tenure split / location within the proposal) and the planning / affordable housing rationale for the proposed dwelling sizes and tenure mix, having regard to factors such as location of the site, the type, evidence of development constraints, local needs, meaningful and viability, to justify a different tenure mix.
- 9.5.2 The wording is sufficiently clear to a decision maker as it sets out one mechanism for addressing the overarching requirements of Part H. It is however acknowledged that it is arguably more of a process requirement and therefore the Council would be open to a modification that moves the text to the supporting text.

9.6 Is Part N of the policy and the approach taken towards Vacant Building Credit in the Plan consistent with national policy?

- 9.6.1 Yes. Part N of the policy in relation to the vacant building credit is broadly consistent with the NPPF.
- 9.6.2 It is however noted that there is nothing in the NPPF 2023 nor the NPPG that require Local Plans to include a policy with respect to Vacant Building Credit and the Council would be open to a modification that deleted Parts N and O.

9.7 Should the policy apply a more flexible approach to the provision of affordable housing in relation to older persons development?

- 9.7.1 No, the policy should not apply a more flexible approach to the provision of affordable housing in older person developments.
- 9.7.2 Local Plan Policy HO4 and London Plan Policy H5: Threshold approach will apply to residential proposals. It is considered that these allow sufficient flexibility to determine an appropriate proportion and tenure mix for affordable housing based on viability and other factors, on a site-by-site basis. Any viability testing required through the threshold approach will have regard to the specific nature of the older persons development (i.e. funding, delivery, cashflow, operational expenses etc). London Plan Policy H13 Specialist older persons housing does not apply any flexibility with respect to affordable housing.

Issue 10: Whether the approach to other housing matters is positively prepared, justified, consistent with national policy and in general conformity with the London Plan

Questions:

Policy H01: Dwelling size mix

- 10.1 Does the requirement for a minimum of 25% of all units to be family sized dwellings (three bedrooms or more) accord with the evidence base or should this be higher?**
- 10.1.1 The requirement for a minimum of 25% of all units to be family sized dwellings (three bedrooms or more) accords with the evidence base and the plan includes provisions to seek a higher proportion on suitable sites and to secure larger two-bedroom dwellings.
- 10.1.2 The Local Housing Needs Assessment (EDH02) indicates a need for circa 80% of all new housing (16,040) to be family sized units (table 54). Such a need for larger family homes is not just a phenomenon in Harrow, but also in many outer London boroughs. Policy HO1 sets out a positive strategy for increasing the provision of family sized housing with an expectation that at least 25% of all new dwellings are three bedrooms or more. This approach ensures an appropriate balance is achieved between the need to increase the provision of family housing through setting a clear and justified minimum target, and a range of other factors, such as increasing the delivery of housing to address local needs by optimising the output of sites; the need to consider the site size, constraints, location, area's character, viability and market dynamics (as per London Plan Policy H10 Housing size mix).
- 10.1.3 Part A2 of the policy also requires that 2-bedroom dwellings have a minimum of 4 bedspaces, which will allow flexibility to the changing circumstances of households (such as growing families) in the short-term).

- 10.1.4 The Local Plan Viability Study (2024) assessed the impact of the proposed target for ensuring 25% of units are family sized housing. This concludes the proposed housing allocations identified are broadly viable and deliverable (EBLE02).
- 10.1.5 To set a target significantly higher than 25% would not accord with London Plan Policy H10 (Housing size mix), specifically that schemes should generally consist of a range of sizes, deliver mixed and inclusive neighbourhoods and deliver a range of dwelling types at different price points across London. That policy also recognises that role that smaller dwelling sizes can play in reducing the pressure for conversion, sub-division and amalgamation of existing family sized stock and freeing up existing family housing.

10.2 Is the policy as drafted sufficiently flexible, and does it present a justified and effective approach?

- 10.2.1 Yes, the policy as drafted is sufficiently flexible and does present a justified and effective approach.
- 10.2.2 As noted above the LHNA (EBH02, 2024) and other evidence indicate there is a high priority to increase the provision of family sized housing (3 bedroom/+) to; address the needs of existing and future households (i.e. families with children, multi generation families), reduce overcrowding, provide housing options that are affordable and suitable for younger families and lower income households.
- 10.2.3 Policy HO1 Part 3 provides criteria for considering locally specific factors to allow flexibility for applicants to demonstrate why a minimum of 25% of all new homes cannot be family sized. The Local Plan viability assessment indicates the requirement of ensuring 25% of all units in new family sized units is broadly viable and deliverable.
- 10.2.4 The above approach is justified given the evidenced need for family sized housing, and flexible and effective as it provides scope for a lower amount to be agreed in order to facilitate developments coming forward for development.

Policy H06: Accommodation for Older People

10.3 What is the justification set out at part 1 (a) of the policy that proposals should demonstrate that it would meet an identified local need?

- 10.3.1 The justification for the requirement set out at part 1 (a) of Policy H06 that proposals should demonstrate that they would meet an identified local need is as follows:

- (1) The older person accommodation market is evolving; new products are emerging from this process, and it will be important to ensure the proposed accommodation will address local needs

- (2) The supply, government policy and market can change and the requirement to demonstrate a need can ensure flexibility to avoid risk of policy becoming outdated.
- (3) It reduces the risk of an oversupply of older person housing, which could compromise addressing the needs of conventional housing for families.

10.3.2 However, it is recognised the policy could be enhanced by only requiring proposals to demonstrate need, if it does not comply with the need to the types of older person accommodation identified by LIN Housing study (EBH04: An assessment of housing needs of older people and adults with care/support needs) or updates to this. The Council would therefore be open to a modification, if necessary.

10.4 Are all the policy requirements set out at part 3 of the policy justified?

10.4.1 Yes, the policy requirements set out at part 3 of the policy are justified due to reasons below.

(1) The policy requires 100% of all habitable rooms and multi-purpose rooms used by visiting healthcare and other professionals to wheelchair accessible, as the evidence base (EBH04 - Housing LIN Study) indicates care homes residents tend to be aged 75+ and move into these due to acute health issues or care requirements. This requirement ensures accessibility and independence for residents who may be bedridden, suffer disabilities or dependent on wheelchairs or electric scooters. The NHS recommended this requirement to apply to multi-purpose rooms used by professionals.

(2) Part 3 also requires adequate access and safe drop off within 50m of the main entrance of care homes. The Inclusive mobility guide (2021)¹ indicates 50m is a reasonable distance without a rest for those who require a walking stick (section 3.4). This is consistent with London Plan Policy T6 that indicates disabled person parking bays should be designed in accordance with the design guidance in BS8300vol.1. This guidance states “*designated accessible parking spaces should normally be within 50 m of an accessible entrance*”.

10.4.2 All the other parts of the policy are concerned with ensuring well-designed, high-quality developments, in compliance with the NPPF.

Policy H09: Large Scale Purpose built and conversions for shared living.

10.5 Is part A (c) of the policy flexible enough or should it also include Harrow’s designated town centres and areas with a high PTAL rating?

10.5.1 Part A (c) of Policy H09 is sufficiently flexible given the limited need for large-scale shared living identified in the Council’s evidence base (EDH02) and there is no need to include Harrow’s designated town centres and areas with a high PTAL rating.

¹ [Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure](#)

- 10.5.2 In compliance with the London Plan Policies H16: Large Scale Purpose Built Shared Living (LSPBSL) [part A(3)] and LSPBSL London Planning Guidance (LPG)², the Local Plan is proposing to direct LSPBSL that are car free developments within the boundary of the Opportunity Area (OA). This strategic area is proposed to accommodate a significant level of the Borough's housing and employment needs. It contains a Metropolitan and District Town Centre, the Station Road corridor that connects these, as well as two railway stations and a Bus Station. This location is considered to be the most sustainable locations for accommodating high density LSPBSL developments, as well as accessing public transport (. e.g. large part of this is within PTAL 5-6), local services, facilities and employment opportunities within the Borough and wider area (central London). The Local Plan IIA indicates the preferred policy of directing LSPBSL in the opportunity performs better than reasonable alternative 3 (i.e. allow LSPBSL in PTAL 3-6, major/metropolitan town centres).
- 10.5.3 The Council do not consider it appropriate to introduce more flexibility into the policy, as the Local Plan evidence has identified a lack of need for LSPBSL developments to address local needs (EBH02, paragraphs 5.42-5.44). There is a concern that a greater level of flexibility may result in the delivery of LSBSL schemes in other parts of the Borough, which may adversely impact the delivery of self-contained housing where there is a much greater need to address local needs (particularly family sized and affordable housing), as well as the ability to deliver a range of housing types, tenure to address local housing needs.

10.6 Is the policy as currently drafted justified by the evidence base? In particular, where is the evidence to support the approach adopted within parts (b) and (d) of the policy?

10.6.1 Yes. The policy as currently drafted is justified by the evidence base. This is summarised below:

- (1) Need for LSPBSL: The London Plan (2021) indicates LSPBSL provide a housing for single person households (para 4.16.1). Whilst research by Knight Frank³, Lichfield indicates the average age of LSPBSL residents is 28 and 72% are aged between 26-40. In contrast, the LHNA (EBH02) did not identify any specific requirements to provide LSPBSL to address any local needs, as the younger population (aged 25-44), single households, and student population are not projected to increase (figure 16), and the area lacks a significant existing student population. It identifies a high priority to increase the delivery of family sized and affordable housing, as well as a lack of need to provide smaller sized units.

² [Large-scale purpose-built shared living London Plan Guidance - Feb 24](#), section 2.1

³ [A New Way to Live co-living-report-2024-11304.pdf](#)
[A New Way to Live](#)

In line with the NPPF (Para 60, 63), Criteria Aa seeks to ensure a sufficient amount and variety of land comes forward to address the future housing needs of groups with specific requirements in terms of size, tenure and type of housing. The area's key requirement is self-contained family and affordable housing. It also ensures there is not over supply of LSPBSL, if the market conditions change and delivery of self-contained housing is not compromised within the Opportunity Area (OA) that is expected to accommodate a significant proportion of housing needs.

- (2) **Affordability of LSPBSL (Ab):** The LHNA and completed developments within the Borough indicates LSPBSL tend to be significantly more expensive and less affordable than the alternative private rental products (. i.e. HMO, Flat/house shares). For example, a web search indicates the cost of renting a single room is circa £400-800 PCM and double room is circa £600-800 PCM in a house-share/flat share, inclusive of bills. The cost of LSPBSL unit is circa between £1300 -1600 PCM, some of which are not inclusive of all bills. LSPBSL units are also priced as high as £1,813 PCM. Hence criterion Ab requires evidence in relation to the affordability of LSPBSL products in contrast to alternative products in the private rental sector; to assess whether LSPBSL products will address a local need and whether this will help release the stock of family sized units, used as HMOs or shared houses/flats.

- (3) **Overconcentration test (Ad):** In line with the London Plan Policy HO9 (Ensuring the best use of stock), the LSPBSL LPG (2024) (section 2.2), a 250m walking distance is proposed to assess the over concentration of these within the OA. This ensures a balance is achieved between enabling the delivery of an appropriate level of LSPBSL schemes and an unsustainable concentration. The policy provides flexibility, as walking distances will be used and applicants can demonstrate why appropriate alternative uses would not be unsuitable and viable, to justify a departure. The key reasons to justify the inclusion of this are:
 - (a) There is evidence of a significant level of demand for LSPBSL units within the OA. For example, several LSPBSL schemes have been delivered in recent years. There is a high level of developer interest (via pre-aps, Local Plan making) to bring forward a significant level of sites forward for LSPBSL within the OA.

 - (b) There is a concern that without the inclusion of this test, a high level of LSPBSL may be delivered in the Opportunity Area, even though the LHNA/other evidence demonstrate limited need for LSPBSL, and the priority need is for self-contained housing (. i.e. family, affordable).

10.6.2 The deletion of this test may result in LSPBSL schemes compromising the delivery of self-contained residential accommodation, including addressing priority needs for family and affordable housing, impacting the creation of mixed and inclusive communities within the OA. This would be contrary to Policy H16 particularly Part A2, which requires schemes to contribute towards mixed and inclusive

neighbourhoods, the NPPF test of soundness (. i.e. effectiveness, positively prepared) and IIA.

10.7 Does the policy overall present a flexible approach?

- 10.7.1 Yes, the policy provides a sufficiently flexible approach in the context of the evidence base informing the Plan indicating there is limited need for LSPBSL relative to family sized and affordable housing.
- 10.7.2 The Local Housing Needs Assessment (EBH02) did not identify any specific need for LSPBSL, as the number of single person households, aged between 25-44 are not projected to experience any significant increases over the plan period. Therefore, in line with the test of soundness (positively prepared and justified) and the need to address priority housing needs for family and affordable accommodation, a pragmatic approach has been taken in relation to including flexibility in the policy (e.g. criteria Ad).
- 10.7.3 The policy has sought to achieve a balance between recognising the role LSPBSL may play to increase the supply of housing to address needs and ensuring the right type, size of housing is delivered to address local needs and promote mixed inclusive communities. The inclusion of the policy seeks to facilitate this provided proposals can demonstrate that it will assist meeting local housing needs either directly or indirectly (by freeing up family sized housing). The policy includes flexibility with respect to the concentration test (Ae) and allocated sites (Af).

10.8 Do parts of the policy (e and i) repeat other policies contained within the Plan?

- 10.8.1 Parts e and i of the policy set important considerations for assessing LSPBSL proposals such as the need to protect residential amenities, character of area, support mixed and inclusive communities, and servicing. It is however acknowledged that these matters are covered by other policies (SP3, GR1) and the Council would be open to their deletion.

Policy GR10: Infill and backland sites, back gardens and amenity areas

10.9 What is meant by part f of the policy? How will this be assessed?

- 10.9.1 Accessible to all means that new development is able to be accessed by all in society regardless of their physical capabilities. This will be assessed by ensuring there are no physical barriers to the development and development would be entered, used and exited safely.
- 10.9.2 The requirement has been included as the nature of the types of sites covered by the policies is that they can be constrained with respect to their size and topography and that accessibility can be problematic with respect to access to

the site (conflict between vehicles and pedestrians/wheelchair users) and to the buildings themselves.

10.9.3 It will be assessed through consideration of access arrangements to the site (highways) and Building Regulations.

10.10 Is part g of the policy justified?

10.10.1 Yes, part (g) is justified. The Council will be producing a Supplementary Planning Documents to assist with small site developments which will provide further guidance on developments that fall within each part of Policy GR10. The NPPF 2023 (paragraph 134) envisages Supplementary Planning Documents providing design guidance beyond Local Plan detail, with Policy GR10 providing the policy hook for such supplementary guidance being delivered. This approach is also consistent with paragraphs 4.2.5 and 4.2.5 of the London Plan.

10.11 What is meant by part A (b) of the policy and the cross reference to Strategic Policy 3? Does the policy need to be more specific regarding which part of Strategic Policy 3 is being referred to?

10.11.1 Part A(b) means that any proposals for sites covered by the policy provide the type of housing required in the borough and set out in Strategic Policy 3 (SP3); it is a link between design and need.

10.11.2 It is not considered necessary nor appropriate for Policy GR10A(b) to be more specific with regard to which part of SP3 is being referred as there are several parts of SP3 that would be relevant to GR10A(b) with respect to this form of development meeting the overall housing target, which types of development these types of development would fall within, the mix of homes and different typologies.

10.11.3 Part A (b) will provide clarity to decision makers that there is an important link to the strategic approach to such developments. However, each application will be determined on its own merit and address more specific policies, specifically in relation to housing mix and delivery.

Issue 11: Whether the approach to meeting the needs of Gypsies and Travellers is justified, positively prepared, consistent with national Policy and in general conformity with the London Plan Questions

11.1 As drafted, part 1 of policy HO12 identifies the need for 12 additional pitches for future traveller needs to 2032. What is the established need for Gypsy and Traveller Accommodation over the plan period?

11.1.1 The draft Plan does not set a need target for the full plan period as the London Plan Policy H14 (Gypsy and traveller accommodation) indicates that:

(a) boroughs must include ten-year pitch targets in their DPDs (Part A); and

(b) targets should be set either utilising the figures included within the Plan (Part B), updated local evidence (Part C) or updated pan-London study (paragraph 4.14.2)

11.1.2 The GLA has commissioned consultants to assess the future G & T pitch needs for all London Boroughs between 2022-32 (as indicated by paragraph 4.14.2 of the London Plan). The provisional findings of this identified a need to provide 12-13 pitches between 2022-32. This is being used as the basis of meeting the requirements of London Plan requirement for a ten-year target / GLA evidence to inform these targets. Consequently, there is no evidence establishing need beyond 2032.

11.1.3 The Council is open to the inclusion of a modification to clarify that any G & T pitch needs beyond 2032, will be based on any need figure included within the London Plan or an updated accommodation needs assessment.

11.2 The Plan states that the existing Gypsy and Traveller site at Watling Farm will be used to address needs to 2032. In what way does policy H012 seek to address Gypsy and Traveller Needs for the Plan period?

11.2.1 Policy HO12 addresses Gypsy and Traveller Needs for the Plan period in two primary ways.

11.2.2 Firstly, it refers to the existing Gypsy and Traveller site at Watling Farm, which has sufficient capacity to address the existing provisional pitch needs identified by the Draft GLA GTANA to the year 2032.

11.2.3 Secondly, in line with the Planning Policy for Traveller Sites (PPTS, 2024) a positive criteria-based policy has been included to assess proposals and to support the delivery of pitches to address the existing/future accommodation needs of the traveller community.

11.2.4 The LPA has undertaken a high-level assessment of the pitch capacity of the Watlings Farm G & T site.

11.2.5 The Department of Communities and Local Government Designing G & T Sites - Good Practice Guide (2008)⁴, advises that there are no one-size-fits all measurements of a 'standard' pitch or site. Account should be taken of the accommodation needs of different sized households but as a general guide, an average family sized pitch should be capable of accommodating a hard standing for 1 large mobile home, a hard standing for 1 touring caravan (trailer), parking spaces for 2 vehicles with suitable surface, 1 small amenity block, a lockable storage shed, a drying area and a small garden area. Further, it notes for health and safety (e.g., fire prevention) minimum distances should be planned for.

⁴ <https://assets.publishing.service.gov.uk/media/5a79e68040f0b670a8026416/designinggypsiesites.pdf>

11.2.6 Based on approaches taken by other Councils⁵ to estimate the number of pitches that could be delivered on a site, it was reasonable to assume a 500sqm (0.05 ha) area is able to accommodate a Gypsy and Traveller pitch and its supporting facilities, in line with the DCLG guidance. Therefore, based on a site area of 1.07ha, less 0.13ha that is licenced to an existing family, it is estimated that the Watlings farm site has a capacity to deliver a total of 18 pitches (. i.e. (1.07-0.13)/0.05). This demonstrates that the site has sufficient capacity to address existing pitch needs and additional needs beyond 2032.

11.3 The Council have indicated that the GLA London Gypsy and Traveller Accommodation Needs Assessment (GTANA) will be published in Spring 2025. What is the exact timeframe for the publication of this document and what are the implications, if any, for the drafting of policy HO12?

11.3.1 The Council have worked with the GLA Gypsy and Traveller Accommodation Needs Assessment (GTANA) consultants to assist them undertaking this assessment, by providing comments on the provisional GTANA summary document, to enable them to identify/address any issues. To date, LPAs have not received a copy of the complete detailed Draft GTANA document, only borough-specific extracts.

11.3.2 The GLA have indicated the final GTANA may be published during this summer but have not yet set any firm dates for this.

11.3.3 The Council does not consider that the final publication of the GLA GTANA is not likely to have any major implications for the drafting of policy HO12 and may potentially result in minor changes to the need figure or no changes, as the Borough has a small a small G & T population. The Council is open to inclusion of a modification to clarify that pitch needs will be based on the final GLA GTANA.

11.4 As currently drafted, does the Plan meet the requirements of the PPTS by identifying a supply of land to meet needs and/or setting out a criteria-based approach to assessing any applications which may come forward?

11.4.1 Yes. The Council own the Watlings Farm site (GB2), which currently has two G & T pitches on it and had a historic (now lapsed) permission for the delivery of 15 pitches. In line with the PPTS (para 13), this existing site allocation is considered suitable for expansion to provide additional pitches as it will provide a settled base for the traveller community, reducing the need to travel long distances or risk of unauthorised encampments, promote co-existence between the occupants and the local community, as well as not being impacted by flood risk.

⁵ [Traveller Site Selection Methodology \(enfield.gov.uk\)](http://enfield.gov.uk)
[Three Dragons report \(ealing.gov.uk\)](http://ealing.gov.uk)
[Gypsy and Traveller - Land Availability Assessment 2014.pdf \(welhat.gov.uk\)](http://welhat.gov.uk)

- 11.4.2 In line with the PTTS (para 10), it is available, suitable for a G & T site and deliverable within a 1–5-year period. It has sufficient capacity to fully meet the need to deliver 12 pitches and any additional needs that may arise.
- 11.4.3 The Council intends to commence work, in partnership with the local gypsy and traveller community, to bring the site forward the site to address the identified pitch needs.
- 11.4.4 In line with the Planning Policy for Traveller Sites (PPTS, 2024), a positive criteria-based policy has also been included to assess proposals and to support the delivery of pitches to address the existing and future accommodation needs of the traveller community.
- 11.4.5 The policy therefore meetings the requirement of the PPTS by allocating a suitable site to meet identified need (PPTS paragraph 10) and criteria to assess any applications that come forward nonetheless (PPTS paragraph 11).
- 11.5 Are the criteria set out at part 3 (a-g) of the policy justified and positively prepared?**
- 11.5.1 Yes, line with the PPTS (para 11), a positive criteria-based policy has been included to assess proposals, to support the delivery of G & T pitches within sustainable locations and the nomadic lifestyle.
- 11.5.2 The criteria a- g have been drafted to comply with PTTS (para 13) and are justified. They set out all the factors that will be considered to assess proposals and promote the sustainable development of pitches. They seek to ensure the traveller community get a fair and equal treatment via the planning process.
- 11.6 Does the policy as drafted adequately address the concerns raised by Historic England regarding the effect of any proposals on the significance of the nearby Watling Farm listed building and its setting? Please note additional questions have been raised regarding the proposed allocation of site GB2 which is within the Green Belt, and these are set out under a separate matter.**
- 11.6.1 Yes. In response to the issues Historic England raised in their Local Plan Regulations 19 representation, the Council have already proposed a set of modifications to Policy HO12 and Site allocation GB2. (LBH/ED9)

11.8 Part E of the PPTS advises the Green Belt boundaries should be altered only through exceptional circumstances. The text goes onto note at paragraph 17 that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only. In light of what the Council are proposing regarding site GB2, should the exceptional circumstances for altering the Green Belt boundary be established through this Plan?

11.8.1 It is not proposed to alter the Green Belt boundaries because of site allocation GB2 Watling Farm. The site is an existing allocation for Gypsy and Travellers pitches within Green Belt, already contains pitches and has previously benefited from a planning permission for 15 pitches (now lapsed). The proposed allocation would reflect the same approach as the current Local Plan, in that the site allocation would be 'washed over' by Green Belt, as there would be no changes to the Green Belt boundaries.

11.8.2 As no change is proposed to the Green Belt boundary, there is no need to establish any exceptional circumstances.

11.9 If this is the case, what do the Council consider the exceptional circumstances to be for altering the Green Belt boundary to meet the needs of Gypsies and Travellers over the Plan period?

11.9.1 See above.