

Submission from the Panshanger People residents group to the Planning Inspector for Welwyn Hatfield's stage 3 hearing on the 19-21st February 2018

We would like to make the following points in relation to the three questions relating to the gypsy and traveller assessments and proposals:

In the Inspector's preliminary questions he asks the following in SP 7 Type and Mix of Housing:

Point 44. Is the requirement for gypsy and traveler accommodation founded on a robust evidence base that is fit for purpose?

Point 45. What reliance should be placed on the estimate that only 61 new pitches are required?

Point 46. Does the policy address the immediate rather than the long term need for gypsy and traveller pitches?

Below are the points we would like to make in response to all of these questions:

Our responses to Local Plan consultations over the last several years have questioned the robustness of WHBC's evidence within their needs assessment reports. WHBC's initial assessment in 2011 and the follow up needs assessment of 2016 contain no evidence of any qualitative direct engagement with the Traveller communities of Welwyn Hatfield. A short question paper involving a box ticking exercise is the primary evidence base for the resulting assessment conclusions. The respondents to this paper exercise apparently number only 42. In terms of face to face engagement page 9 of the 2011 report states:

"During the fieldwork only one household agreed to participate therefore due to the small sample size, this is not considered to be a representative sample."

In addition page 16 of this assessment states:

"8 respondents indicated they would like to live within Hertfordshire, 3 specified the East Herts District area, which is very close to the Holwell site. One respondent specified a preference for particular sites (Holwell / Barley Mo). The majority of respondents living on the public site (Holwell) did mention, as a first choice, that they would like their family members to be able to remain on Holwell."

The 2011 assessment estimates 54 new pitches will be needed between 2011 and 2026. Some respondents clearly want to live outside the borough and the majority said they want to stay in existing sites. WHBC now plans to create new traveller sites in new locations, but there is no evidence from the traveller community itself that this is what they want to happen. There is no direct quantitative or qualitative evidence of what the traveller community itself wants and favours. Does WHBC not have a duty to be far more inclusive of the traveller community, making more of an effort to ascertain their wishes and feelings, rather than imposing upon it what they speculate should happen?

In the WHBC 2016 updating assessment it states on page 6:

"Site visits were carried out every week through-out February 2016. Multiple visits were made to sites to maximise participation rates. The majority of residents on private sites politely refused to take part in the fieldwork."

It goes on to say

"A lower response rate was achieved in 2016 compared to the previous assessment which was carried out in 2011." With only 42 respondents taking part in 2011 and in 2016 fewer still, this doesn't appear to be a large enough sample to be reliable or truly indicative.

The government changed its definition of travellers between 2011 and 2016. The definition became somewhat tighter and many LA's found that following a re-assessment of need after this new definition was applied, the total pitch provision required fell. However, in Welwyn Hatfield the total figure rose instead, from 54 to 61. It's also unclear why WHBC have made provision to offer 4 of their proposed 15 pitches on WGC5 to East Herts. East Herts have not asked for these as far as we know, and their overall projected need is a fraction of Welwyn Hatfield's, this doesn't add up.

By way of comparison the East Herts equivalent assessment was carried out in 2014 by a research company experienced in this field. Their report states the total number of traveller pitches required up to 2031 is 12. (East Herts Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment p.50).

The East Herts assessment methodology would seem to be more thorough, and better executed than the WelHat equivalent. East Herts claim to have carried out 30 individual in-depth interviews.

WHBC must have been aware of the 2014 East Herts report, and how vastly different their total was in comparison to their own report. Did they not try and co-operate with East Herts to see what scope there was for evening out the pitch provision numbers between the two districts? Particularly as one of the biggest traveller sites almost straddles the two districts?

Page 27 of the East Herts report does recognise there can be a problem with attempting to do this when it is stated on page 27:

3.114 Some Officers reported that working with other local authorities is sometimes difficult, not because there is a lack of interest in doing so, but that it is politically a very difficult and controversial issue and sometimes the cooperation is next to nothing or a tick box exercise.

It is insightful that East Herts recognise this, but it doesn't mean that WHBC shouldn't have attempted to do it.

Our comments here are not NIMBY or anti-traveller, but there is clearly quite a contrast between the findings of WHBC and East Herts when carrying out the same piece of research. It's unclear how there can be such a vast difference in findings (12 Vs. 61) and why the authorities have not co-operated to try and understand this and even out the numbers, or even attempt to. One of the new sites for pitches being proposed is within Panshanger WGC, beside an existing 'Brick and Mortar' community.

We have a situation where nearby residents have never been directly canvassed about that proposal (bearing in mind the 1% response rate to poorly publicised Local Plan consultations overall), and we have a situation

where the traveller community itself doesn't seem to have been canvassed in any meaningful way as to whether they would want to live in an area such as this.

Surely WHBC has a duty to engage both groups in a far more effective way in order to build up a credible evidence base as to what the future needs are in the Borough for both of these communities?

The current WHBC methodology seems to be to tell or impose on communities what is going to happen to them, rather than to seek their genuine participation and give them a stake in their own future, in keeping with the spirit and wording of the Localism Act.