

**From:** John Cox  
**To:**  
**Subject:** BRENT Reg19: 6.2 Housing - supplementary response  
**Date:** 05 December 2019 22:52:37

---

## **Reg19: 6.2 Housing - supplementary response**

Because of another submission to you, it is clear I was given the wording below by 'London Gypsies & Travellers', a contact I had made within the London-wide 'Just Space' network.

My understanding was that I should submit this wording, and they would submit something different but more detailed, but no matter - it was entirely their wording, except for a few inconsequential changes..

I had however produced my own final paragraph differing from theirs (which I copied to them).

Allow me to suggest your consultation response document on BH9 deals with all of their submission first, then ignores all of mine, except for my final paragraph.

=====

*Submitted earlier:*

### **Brent Policy BH9: Gypsies and Travellers**

The West London Gypsy and Traveller Accommodation Needs Assessment you refer to has found:

*“There is a need for 86 additional pitches for households that did not meet the planning definition. This is made up of 23 concealed or doubled-up households or adults, 16 teenage children who will be in need of a pitch of their own in the next 5 years, 2 movement from bricks and mortar, 4 from in-migration and 41 from new household formation using a formation rate of 2.25% derived from the household demographics.”*

Clearly there is evidence of need arising from the site at Lynton Close, so the second half of the policy's first sentence is not justified and should be removed.

The sentence becomes:

*“The existing Lynton Close travellers' site will be retained.”*

The Needs Assessment also says:

*“The need for those households who did not meet the planning definition will need to be addressed through other means such as the SHMA or HEDNA and through separate Local Plan Policies as set out in the revised NPPF.”*

You cannot ignore the evidence and should plan to meet these needs. Policy BH9 should set a target to meet identified need of up to 90 additional pitches.

The welcome approach that accommodation for Gypsies and Travellers should be provided for in Growth Areas should generally be mandatory. The earliest possible provision within the Growth Areas should occur, to allow early and stable links to be made within the wider incoming communities, and to provide early school-settlement, job and training opportunities.

*John Cox*