

**Response to Brentwood Local Plan Preferred Options Consultation
Traveller Law Reform Project
2 October 2013**

The Traveller Law Reform Project (TLRP) is a partnership of Traveller organisations, promoting Traveller Law reform and monitoring its implementation. We wish to submit a number of comments on the Brentwood Local Plan Preferred Options in support to the representations made by the Brentwood Gypsy Support Group (BGSG), the Traveller Movement and other Gypsy and Traveller organisations and community representatives.

We acknowledge that the approach set out in Policy DM28 is very positive and it generally meets the requirements of the Planning Policy for Traveller Sites. However, we consider the pitch target to be based on an underestimation of need, which should be amended in order to ensure the soundness of the Plan.

First of all, we wish to support the figures proposed by the BGSG and the Traveller Movement, which estimate a need for an additional 75-86 pitches by 2030. A pitch target starting at this range would recognise the real scale of need for Gypsy and Traveller sites. We consider the need identified in the East of England Plan to be an underestimation, given the issues presented in the Regional Strategy Panel Report, the shortcomings of assessing the needs of housed Gypsies and Travellers, migration into the area and an unwillingness within the community to self-identify due to fear of discrimination.

In addition, TLRP research on Local Plans in the South East and East of England after the adoption of the Planning Policy for Traveller Sites shows an emerging trend in very low levels of need identified through the new Gypsy and Traveller Accommodation Needs Assessments. We therefore strongly advocate for a realistic and inclusive target for at least 75-86 additional pitches to be delivered in Brentwood by 2030.

Regarding the identified land supply, we wish to support the comments and proposals made by the BGSG in sections A-D of their consultation response. In line with the principles set out in the Planning Policy for Traveller sites relating to site sustainability and community inclusion, other alternatives should also be included in the site allocation process, such as smaller sites to accommodate extended families and integration of pitch provision within larger housing developments.

Finally, the target should be met through the development plan process, by identifying broad site locations, as opposed to waiting for some of the provision to be made through planning applications. This would mitigate the constraints imposed by the Green Belt and scarcity of developable land.