

**London Legacy Development
Corporation**

**Gypsy and Traveller Site
Assessment Study**

Final Report

Project Ref: 27376/001

Doc Ref: 01

May 2014

Peter Brett Associates LLP

10 Queen Square

Bristol

BS1 4NT

T: 0117 9281560

F: 0117 9281570

E: bristol@peterbrett.com



Site Assessment Study
Gypsy and Traveller Site Study




Document Control Sheet

Project Name: Gypsy and Traveller Site Assessment Study

Project Ref: 30112/001

Doc Ref: 01

Date: May 2014

	Name	Position	Signature	Date	
Prepared by:	Sharon Jefferies	Senior Planner		28/05/2014	
Reviewed by:	Paul Jobson	Associate		29/05/2014	
Approved by:	John Baker	Partner		29/05/2014	
For and on behalf of Peter Brett Associates LLP					
Revision	Date	Description	Prepared	Reviewed	Approved
00	28/02/2014	Draft Report	SJ	PJ	JB
01	26/03/14	Final Report	SJ	PJ	JB
02	29/05/14	Final Report - Amended	SJ	PJ	JB

Peter Brett Associates LLP disclaims any responsibility to the Client and others in respect of any matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence within the terms of the Contract with the Client and generally in accordance with the appropriate ACE Agreement and taking account of the manpower, resources, investigations and testing devoted to it by agreement with the Client. This report is confidential to the Client and Peter Brett Associates LLP accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

© Peter Brett Associates LLP 2013

Site Assessment Study
Gypsy and Traveller Site Study

Contents

1 Introduction and Background 6
 1.1 Introduction 6
 1.2 Background 6

2 Site Requirements 8
 2.1 Introduction 8
 2.2 Number of Pitches Required 8
 2.3 Number of Sites Required 9
 2.4 Site Location 10
 2.5 Relationship to Surrounding Land Uses 10
 2.6 Site Conditions 11
 2.7 Essential Services 11

3 Methodology for Site Selection and Assessment 12
 3.2 Stage 1 Suitability and Availability Matrix 13
 3.3 Stage 2 Detailed Site Assessment 16

4 Site Assessment and Capacity Results 21
 4.2 Site Assessment Results and Recommendations 21

Tables

Table 3.1: Broad Site Criteria 13
 Table 3.2: Stage 1 Assessment Process 14
 Table 3.3: Application of site assessment criteria 17
 Table 4.1: Stage 1 Matrix 23
 Table 4.2: Site with No Potential at Stage 2 25
 Table 4.3: Summary of Gypsy and Traveller need and supply for LLDC in 5 year time periods 26

Appendices

- Appendix 1: Sites Location Map
- Appendix 2: Design Templates

1 Introduction and Background

1.1 Introduction

1.1.1 The London Legacy Development Corporation (LLDC) have commissioned Opinion Research Service (ORS) to undertake the needs assessment and site assessment. Peter Brett Associates LLP (PBA) are working with ORS to assess sites and provide advice on the potential delivery of pitches. The objective of this study is to assess sites to determine if they are suitable, available and achievable. This included an assessment of six sites identified by LLDC as possible locations for new pitches.

1.1.2 The results of this study will inform the development of relevant policies and allocations and to guide the consideration of future planning applications for Gypsy and Traveller sites.

1.2 Background

1.2.1 Gypsies and Travellers have lived in Britain for at least 500 years and probably longer. For the purposes of the planning system, Gypsies and Travellers means:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.”
(*Planning policy for traveller sites*, CLG, March 2012).

1.2.2 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.

1.2.3 Gypsies and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:

- Romany Gypsies;
- Irish Travellers; and
- New Travellers.

1.2.4 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Acts.

1.2.5 The Government published a new policy statement *Planning policy for traveller sites* in 2012, replacing Circulars 01/2006 and 04/2007 to address future accommodation needs of

Site Identification Study

Gypsy and Traveller Site Study

Gypsies, Travellers and Travelling Showpeople because the previous planning policy arrangements had failed to deliver adequate sites to meet identified needs over the previous 10 years.

- 1.2.6** Local planning authorities are currently required to identify and allocate sufficient sites to meet the needs of these groups within their local plans. This means that when delivering sites consideration is required to which sites are available and suitable for different types of the travelling community.

2 Site Requirements

2.1 Introduction

2.1.1 'Planning policy for traveller sites' (CLG, March 2012) states that the overarching aim of Government is "to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community." (para 3).

2.1.2 The document includes some significant changes to the way in which the site needs of Gypsies and Travellers are planned for. The most significant change has been the removal of regional targets and the replacement with a new system of locally generated targets. Under this, local planning authorities are required to:

- Use a robust evidence base to establish accommodation needs;
- Set pitch targets to address the likely permanent and transit site accommodation needs of travellers in their area;
- Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
- Identify a supply of specific developable sites or broad locations for years six to ten and where possible for years 11-15; and
- Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward.

2.2 Number of Pitches Required

Gypsies and Travellers and Travelling Showpeople

2.2.1 The main consideration of this study is the provision of pitches/plots and sites/yards for Gypsies and Travellers and Travelling Showpeople. A pitch is an area which is large enough for one household to occupy and typically contains enough space for one or two caravans, but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers.

2.2.2 For Travelling Showpeople the terms most commonly used are a plot for the space occupied by one household, and a yard for a collection of plots (typically occupied exclusively by Travelling Showpeople).

2.2.3 This terminology reflects a difference between the residential pitches of Gypsies and Travellers and the mixed use plots of Travelling Showpeople, the latter commonly being used for the storage and maintenance of equipment as well as for residential purposes.

2.2.4 In the LLDC area there are currently, 2 public Gypsy and Traveller sites (for 5 pitches), both with temporary planning permission owned and managed by the London Borough of

Hackney. There are no existing Travelling Showpeople sites. This study has not assessed the existing sites for their suitability for permanent planning permission.

London Legacy Development Corporation Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2014

- 2.2.5** In 2014 a new *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA)* was completed by consultants ORS.
- 2.2.6** ORS attempted Interviews with every Gypsy and Traveller household in the area who were present in February 2014. In total, interviews were achieved on-site with 3 households and a further 4 in bricks and mortar.
- 2.2.7** The *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2014)* estimate for extra site provision to meet overall gross residential needs between 2014 and 2028 for LLDC is 15 pitches to address the needs of all identifiable households. The GTAA also includes two alternative scenarios to reflect the high waiting list for pitches from bricks and mortar accommodation in Hackney and the relocation of an existing site in Newham at Parkway Crescent. The scenarios suggest a gross need for 24 and 46 pitches respectively between 2014 and 2028. The GTAA outlines the methodology of how this number was derived.
- 5 pitches for the existing 2 sites which have existing temporary permissions to be granted full planning permission; and
 - 10, 19 or 41 pitches to meet the needs of concealed households, net movement from bricks and mortar and future household formations. The higher scenario figures of 19 and 41 reflect the greater need from bricks and mortar from Hackney (both scenarios) and the relocation of an existing site in Newham (highest scenario only);
- 2.2.8** The GTAA does not identify a need for transit or emergency stopping places, or plots for Travelling Showpeople.

2.3 Number of Sites Required

- 2.3.1** National evidence would suggest that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family. Government guidance¹ suggests that “*experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of between 3-4 pitches can also be successful, particularly where designed for one extended family*” (para 4.7).
- 2.3.2** The actual number of sites required to meet the defined need of 15-46 pitches will be determined according to size and availability of the potential sites identified as capable of meeting the defined need.

¹ Communities and Local Government (2008) *Designing Gypsy and Traveller Sites Good Practice Guide*

2.4 Site Location

General Approach to Location

- 2.4.1** *'Planning policy for traveller sites'* (CLG, 2012) states that "local planning authorities should ensure that sites are sustainable economically, socially and environmentally" (para 11).
- 2.4.2** Sites should be located so as to provide a settled base that reduces the need for long distance travelling and unauthorised encampment (para 11).
- 2.4.3** Local planning authorities should reflect the extent to which Travellers working and living from the same location could contribute to sustainability (para 11) and therefore should consider mixed sites with residential and business uses or separate sites but in close proximity (para 16).

Access to Services

- 2.4.4** *'Planning policy for traveller sites'* (CLG, 2012) states that local planning authorities should promote access to appropriate health services and ensure that children can attend school on a regular basis but avoid placing undue pressure on local infrastructure and services (para 11).
- 2.4.5** Local planning authorities should ensure adequate play areas for children (para 24).

2.5 Relationship to Surrounding Land Uses

- 2.5.1** The Government is keen to promote a peaceful and integrated co-existence between a Gypsy or Traveller site and the local settled community. In order to facilitate this, national guidance² states that "*where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments*" (para 3.7). However, *'Planning policy for traveller sites'* states that "*local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community*" (para 12).
- 2.5.2** DCLG guidance on the design of sites for Gypsies and Travellers also emphasises the importance of locating sites away from heavy industry and states that locations adjacent to industrial areas are unpopular because of their relative isolation, distance from local facilities and because of safety fears.
- 2.5.3** An important consideration is avoiding noise and disturbance. This can be to the settled community, in terms of the movement of vehicles to and from the site, from the stationing of vehicles on-site and on-site business activities. Given the greater noise transference through walls of caravans than through walls of conventional housing, there can also be noise and disturbance to the Gypsies and Travellers from adjoining uses, such as from industrial areas, railway lines or from highways. The potential implication would mean that mitigation measures would be proposed to minimise the impacts, and in some instances, some sites would be discounted on noise ground.

² Communities and Local Government (2008) *Designing Gypsy and Traveller Sites Good Practice Guide*

2.6 Site Conditions

2.6.1 'Planning policy for traveller sites' (CLG, 2012) guidance on the design of sites for Gypsies and Travellers identifies that "no sites should be identified for Gypsy and Traveller use that would not be appropriate for ordinary residential dwellings" (para 3.6).

2.6.2 The guidance states that sites should not be located in areas at high risk of flooding such as functional floodplains given the vulnerability of caravans. Consequently the following are not considered acceptable locations:

- Sites within flood zone 3.

2.6.3 The following other sites are unlikely to be suitable:

- Sites located on contaminated land;
- Sites adjacent to rubbish tips;
- Sites on landfill sites; and
- Sites close or underneath electricity pylons.

2.7 Essential Services

2.7.1 DCLG guidance on the design of sites for Gypsies and Travellers states that sites must have access to water, electricity, drainage and sanitation, with electricity and sewerage for permanent sites normally through mains systems, although in some locations alternative provision may be appropriate.

2.7.2 'Planning policy for traveller sites' states that local planning authorities should avoid placing undue pressure on local infrastructure and services (para 11).

3 Methodology for Site Selection and Assessment

- 3.1.1** Based upon our review of available policy, guidance, the identification site needs and requirements, and physical constraints, we identified a series of site criteria. We used these to assess potential sites and to inform recommendations regarding future site criteria for assessing future planning applications.
- 3.1.2** Account was taken of national policy, as contained within *Planning policy for traveller sites* (CLG, 2012) and existing and emerging local policy, as contained within adopted and draft local plans. Account was also been taken of the existing pattern and distribution of need for Traveller provision as set out in the new Gypsy and Traveller Accommodation Needs Assessment.
- 3.1.3** Within the overall policy framework, the general approach to identifying appropriate site selection criteria will be to build upon the national planning policy framework:
- Is the site available?
 - Is the site suitable?
 - Is the site developable, e.g. viable and deliverable?
- 3.1.4** A key consideration, based upon national policy, has been that criteria should be “fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community” (*Planning policy for traveller sites*, paragraph 10). Criteria should be clear and transparent and unambiguous. Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward.
- 3.1.5** The Legacy Corporation identified 6 sites for examination in the study. All sites were involved in a detailed assessment of suitability, availability and achievability.
- 3.1.6** We have taken account of the various criteria from the following sources including:
- ‘*Planning policy for traveller sites*’, CLG, March 2012
 - Adopted and emerging local policy in the LLDC area;
 - ‘*Designing Gypsy and Traveller Sites: Good Practice Guide*’, CLG, May 2008.
- 3.1.7** For the purposes of the site assessment process, we have identified the following broad site criteria:

Site Identification Study
Gypsy and Traveller Site Study

Table 3.1: Broad Site Criteria

Availability		There is evidence that the landowner is willing to sell; and/or There is evidence that a developer is interested in developing. There is confidence that there are no legal or ownership problems, such a multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome. The site is publicly owned and therefore deemed potentially suitable unless identified in a plan or strategy for another use.
Suitability	Policy Constraints	The site is not within an international environmental designation. The site does not compromise the objectives of nationally recognised designations.
	Physical Constraints	The site is not at high risk of flooding which cannot be mitigated. The site is not located on unstable land. The site is not located on contaminated land which cannot be mitigated. The site has good road access. The site is in reasonable proximity to local services and facilities.
	Potential impacts	Development and use of the site will not have an adverse impact upon biodiversity or the historic environment. The site is not subject to unacceptable noise levels nor is it likely to give rise to unacceptable noise levels. The site will have a good residential environment and will not adversely impact upon neighbouring residential amenity.
Developable		Constraints identified are capable of being overcome. Any abnormal costs do not prejudice the ability of the site to be developed.

3.1.8 These broad site criteria have been developed and applied in two stages. The first stage in the assessment process involved a full review of any planning history of sites to identify issues considered in the past and the application of broad suitability criteria, including identifying any absolute constraints, together with an initial investigation of likely availability.

3.2 Stage 1 Suitability and Availability Matrix

3.2.1 The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.

3.2.2 The application of broad suitability criteria sieved out immediately sites which were likely to fail on the grounds of contravening major constraints such as being within environmental designations etc.

3.2.3 Availability was identified through this study as a key criterion. Public owned land was deemed potentially availability for Gypsy and Traveller use, and the availability of the site was then explored more with Stage 2.

3.2.4 The initial assessment of site suitability and availability was summarised in a matrix, as set out below, and the results are within Section 4. We have used a traffic light approach, identifying where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria are satisfied in green. **Table 3.2** overleaf sets out the **Stage 1 Assessment Matrix**.

Site Identification Study
Gypsy and Traveller Site Study

Table 3.2: Stage 1 Assessment Process

Criteria	Designation/Issue	Red (Sites does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Flood Zone	Environment Agency Indicative Flood Mapping and SFRA Area at Risk of Flooding	The site is within flood zone 3 and not suitable for Gypsy and Traveller use.	The site is affected by Flood Zones 2 requiring further investigation (and application of policy tests).	The site is not affected by identified areas of indicative flood mapping or is located in Flood Zone 1.
Environmental Designations	Special Protection Area RAMSAR Site Site of Special Scientific Interest National Nature Reserve Site of Nature Conservation Importance	The site is covered by an international designation.	The site is within the buffer of an international designation and could therefore have a negative impact. The site is covered by a national or local designation or is within close proximity and could therefore have a negative impact.	The site is not within an international, national or local environmental designation or within its buffer.
Landscape	n/a	n/a	The site is within a sensitive landscape and could therefore have a negative impact requiring further investigation.	The site is not located in a sensitive landscape
Contamination or Unstable Land Issues	Land contamination or unstable land issues	The site is located on or adjacent a landfill site or the land is as unstable, and the land has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There are no known contamination or unstable land issues.
Noise Issues	Noise issues relating to existing land uses or transport corridors	n/a	The site is located adjacent noisy land uses, which requires further investigation.	There are no noisy adjacent land uses and therefore no noise impact on the site.
Residential Amenity	Location of site in relation to existing dwellings	n/a	The site is adjacent existing dwellings and requires further investigation.	There are no adjacent dwellings and therefore no impact on residential amenity.

Site Identification Study
Gypsy and Traveller Site Study

<p>Historic Environment</p>	<p>Scheduled Ancient Monument (SAM) Sites of Archaeological Importance Historic Park and Garden Conservation Area Listed building</p>	<p>The site is likely to result in substantial harm to the significance of a Scheduled Monument, Grade I or II* Listed Building, or a Grade I or II* Registered Park and Garden.</p>	<p>The site could result in harm to elements which contribute to the significance of a designated heritage asset, which require further investigation.</p>	<p>The site is unlikely to harm the significance of any designated heritage asset or its setting.</p>
<p>Availability</p>	<p>Promoted sites, public land ownership, etc.</p>	<p>The owner has confirmed that the site is not available, nor is it likely to be available in the future.</p>	<p>Site availability is unknown and requires further investigation.</p>	<p>There is evidence that the landowner is willing to sell or develop the site as a Traveller site. Public owned sites deemed potentially available for Gypsy and Traveller use.</p>

3.2.5 **Stage 2** involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues will also be investigated.

3.3 Stage 2 Detailed Site Assessment

3.3.1 All sites were visited by the consultant team. We are used to recording information and assessing sites in a consistent way and record site details and surroundings using a standard proforma. All stage two sites were sent to LLDC and Borough officers for comment, including highways, ecology, historic environment, development management and planning policy.

3.3.2 **Stage 2** involved a more detailed assessment of suitability and an examination of achievability issues. A further examination of availability was also undertaken at this stage.

3.3.3 Further investigations centred upon:

- Availability – we contacted landowners and identified whether sites were available and any potential legal or ownership constraints;
- Suitability – we assessed each site against the agreed criteria which were grouped into policy requirements, physical constraints and potential impacts; and
- Developability – we identified potential site constraints needing to be rectified which may affect viability and any potential alternative uses likely to affect deliverability.

3.3.4 **Stage 2 Matrix**, in **Table 3.3**, below provides the details for how we assessed each site relating to suitability, availability and achievability.

3.3.5 An accessibility assessment has been undertaken looking at the proximity of the site to key services and facilities, including primary school and general practice surgery. No site has been rejected purely because of distance to facilities.

3.3.6 All issues of potential delivery identified are subject to investigations where possible, with recommendations on how they can be addressed. All sites that could be considered suitable, available and developable would be subject to an initial broad assessment of the capacity of the site in terms of the number of pitches which could be provided on site. This takes into account:

- Size and shape of site and character of the adjoining area;
- ‘Designing Gypsy and Traveller Sites’, CLG, May 2008; and
- Relevant planning history and design templates developed by Peter Brett Associates, as identified in **Appendix 2**.

Site Identification Study
Gypsy and Traveller Site Study

Table 3.3: Application of site assessment criteria

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	Stage 2	Site promoted by landowners, agents or travelling community Public land confirmed as available	Site not available for Gypsy, Traveller or Travelling Showpeople use. There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved. Public land has been identified in another plan / strategy for another use.	There continues to be doubt over whether the site is genuinely available for Gypsy, Traveller or Travelling Showpeople (GTTS) use after further investigations.	There is evidence that the landowner is willing to sell and/or a developer is interested in developing within the timeframe of the Local Plan. There are no known legal or ownership problems, such a multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the Local Plans. Public site is not identified plan or strategy for another use.
Suitability					
Contamination and unstable land	Stage 2	Contaminated Land Unstable Land	Contains an area of unstable or contaminated land that is likely to undermine the site's suitability and achievability.	Could contain unstable or contaminated land that should be subject to further investigation.	Not located on unstable land. Not located on contaminated land.
Topography	Stage 2	Topography	Steep slopes which make the site unsuitable and/or unachievable.	Sloping or undulating land which may require works to achieve a suitable development.	Level or gently sloping site.

Site Identification Study
Gypsy and Traveller Site Study

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Site access and safety	Stage 2	Access Proximity to major roads	Poor access and/or road of poor standard. Likely to be subject to safety issues from surrounding uses incapable of mitigation	Access poor but capable of being improved. Road of adequate or good standard. Likely to be affected by safety issues but capable of mitigation.	Adequate or good access off adequate or good standard of road. Not affected by safety issues.
Accessibility to facilities	Stage 2	Access to facilities: GP Surgery Primary School Shop Access to transport: Bus stop/route Train station	NA	NA	(Actual distances to be measured to facilities).
Potential impacts					
Landscape	Stage 2	Landscape impact and visual containment	Unacceptable impact of site upon landscape not capable of mitigation.	Impact capable of mitigation Potential cumulative impact with other identified sites.	No unacceptable impact on landscape.
Biodiversity / Protected Species / Important hedgerow	Stage 2	Impact on biodiversity or known protected species Site of Special Scientific Interest Local Nature Reserve Geological Sites of Importance for Nature Conservation	Significant effect and unacceptable impact of site upon ecology or protected species or habitats not capable of mitigation where no overriding public interest.	Impact capable of mitigation. Potential cumulative impact with other identified sites.	No significant effect or unacceptable impact on ecology, protected species or habitats.

Site Identification Study
Gypsy and Traveller Site Study

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Historic environment	Stage 2	Scheduled Ancient Monuments Listed Buildings Historic Parks and Gardens Conservation Areas Heritage assets (local)	Significant harm to the significance of a heritage asset not capable of mitigation.	Harm to the significance of a heritage asset but capable of mitigation.	No harm to the significance of a heritage asset.
Water quality	Stage 2	Groundwater Source Protection Zone	Unacceptable risk to the supply and quality of water resources.	Risk to the supply and quality of water resources capable of mitigation.	No risk to the supply and quality of water resources.
Noise	Stage 2	Noise pollution from surrounding uses e.g. road, rail and air transport	Likely to be adversely affected by noise pollution from surrounding uses that could make for an unacceptable residential environment.	Likely to be affected by noise pollution but this is capable of mitigation.	Not affected by noise issues.
Residential amenity (Impact of site on adjoining uses)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses esp. residential properties where any potential impact (light, visual, noise, traffic) on adjoining uses is not reasonably capable of mitigation.	Close proximity to existing adjacent uses esp. residential properties but any potential impact (light, visual, other disturbance) on adjoining uses is capable of mitigation.	Unlikely to adversely affect existing adjoining uses.
Residential amenity (Impact of adjoining uses on site)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses and any potential impact from these uses (light, visual, other disturbance) on the site is not reasonably capable of mitigation.	Close proximity to existing adjacent uses but any potential impact from these uses (light, visual, other disturbance) on the site is capable of mitigation.	Unlikely to be adversely affected by existing adjoining uses.
Developability	Stage 2	Deliverability Viability	Has hope value for housing and/or other land uses. Extensive buildings on site	Site constraints capable of being overcome but where extent and cost of mitigation are	In a location where housing development is contrary to spatial policy.

Site Identification Study
Gypsy and Traveller Site Study

			requiring demolition. Other constraints incapable of resolution without considerable expense.	unclear at this stage.	No site constraints needing to be overcome.
--	--	--	--	------------------------	--

4 Site Assessment and Capacity Results

4.1.1 In this section we identify the sites which we believe are potentially suitable for additional Gypsy and Traveller pitches. All potentially suitable sites would be subject to an initial broad assessment of the number of pitches which could be provided on site. This takes into account:

- Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008);
- Any relevant planning history.

4.1.2 In addition, Peter Brett Associates has developed templates for various forms of Gypsy and Traveller development, including for residential and transit sites. These are used to inform the theoretical capacity of sites. Examples of these templates are set out in [Appendix 2](#).

4.1.3 These are used to help to determine the optimum size and configuration of pitches on site. On larger sites we may assume a mix of pitch sizes to reflect the needs of different families.

4.1.4 Site capacity is also taken account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures to achieve a suitable development. Providing good quality landscaping and access arrangements have been taken into account. This will result in sufficient access and accommodation space to create a site which Gypsy and Traveller find attractive. At the same time, sufficient space and landscaping will help to conserve the residential amenity of neighbouring uses.

4.1.5 Shortlisted sites are assessed solely for their capacity to accommodate residential uses. However, national policy states that some sites may be suitable for a mix of residential and business uses. In cases where potential occupants may wish to accommodate business uses, the suggested capacity of the sites to accommodate residential pitches may need to be reviewed.

4.2 Site Assessment Results and Recommendations

4.2.1 The *Gypsy Traveller and Traveling Showpeople Accommodation Assessment (2014)* identifies a need for 10 net additional Gypsy and Traveller residential pitches to be developed by 2028, (subject to existing temporary permissions for 5 pitches being given full planning permission).

4.2.2 LLDC should consider identifying local targets in its emerging Local Plan to meet these identified needs.

4.2.3 There are 2 existing Gypsy and Traveller sites within the LLDC local authority area with 5 pitches with temporary permissions. The study has not included an assessment of these existing sites for full planning permission. These sites should be assessed by the Legacy Corporation for their suitability for full planning permission. If they are identified as suitable

Site Identification Study

Gypsy and Traveller Site Study

for full planning permission, then these sites should be allocated and safeguarded through the proposed Local Plan or a subsequent DPD.

- 4.2.4** The Legacy Corporation put forward 6 sites to be assessed within this study. The results of this assessment are set out below.

Stage 1 Suitability and Availability Matrix

- 4.2.5** The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability. The location of all sites is set out in **Appendix 1**.
- 4.2.6** The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Table 4.1** overleaf. We have used a traffic light approach, identifying where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria are satisfied in green.

Site Identification Study
Gypsy and Traveller Site Study

Table 4.1: Stage 1 Matrix

Site details				Suitability						Availability	Conclusion
Site ref	Site name and address	Site area (ha)	Source	Flood Zone	Environmental Designations	Contamination or unstable Land Issues	Noise Issues	Residential Amenity	Historic Environment	Availability for G+T Use	Should the site be considered further?
LL001	31-41 White Post Lane	0.24	Call for sites								NO
LL002	90 White Post Lane	0.03	Call for sites								NO
LL003	Land at Bridgewater Road	3.83	Call for sites								NO
LL004	Land at Bartrip Street/Wick Road	0.55	Call for sites								YES
LL005	Land at Bartrip Street/Wick Road	0.39	Call for sites								NO
LL006	Chapman Road Depot Site	0.23	Call for sites								YES

Site Identification Study
Gypsy and Traveller Site Study

4.2.7 Four sites were rejected at **Stage 1**, but all sites were then examined further at **Stage 2**.

Stage 2 Suitability, Availability and Achievability Site Assessments

4.2.8 **Stage 2** involved a more detailed assessment of suitability, availability and an examination of achievability issues. All sites were sent to officers at relevant London Borough's to establish reviews on highway's, ecology, historic environment, development management and planning policy. Comments received were incorporated into the assessment of sites and included within a sites database (Microsoft Access).

4.2.9 The study assessed six sites provided by LLDC. Despite researching all potential sites provided by the Legacy Corporation, the study was unable to identify any available and suitable sites within the LLDC area, to meet the Gypsy and Traveller needs.

4.2.10 **Table 4.2** overleaf sets out those sites where PBA consider there is no potential for further provision and the reasons for this decision. The reasons that sites have no potential include, for example, sites are with flood zone 3 or protected for another use such as open space or employment.

Site Identification Study

Gypsy and Traveller Site Study

Table 4.2: Site with No Potential at Stage 2

Site ref	Site name	Reason for rejection
LL001	31-41 White Post Lane	The site has been identified for the Hackney Wick redevelopment and is also contained within the proposed neighbourhood centre within the Local Plan. The site is owned by London Legacy Development Corporation, and therefore deemed potentially available for Gypsy and Traveller use. It was promoted by the London Gypsy and Traveller Unit to the London Legacy Local Plan, as a site suitable for Gypsy and Traveller use. However, the site is within flood zone 3 and therefore is unsuitable for Gypsy and Traveller use.
LL002	90 White Post Lane	The site is privately owned and availability for Gypsy and Traveller use is unknown. Therefore the site is deemed unavailable for Gypsy and Traveller use. It was promoted by the London Gypsy and Traveller Unit to the London Legacy Local Plan, as a site suitable for Gypsy and Traveller use. The majority of the site is also within flood zone 3 and therefore unsuitable for Gypsy and Traveller use.
LL003	Land at Bridgewater Road	The site owned by London Legacy Development Corporation. The site has outline planning permission under the LCS application number 11/90621 for 300 homes, to be delivered after 2020, and allotments. The allotment element is currently being developed and the LLDC are looking to implement the permission fully. Therefore the site is unsuitable and not available for Gypsy and Traveller use.
LL004	Land at Bartrip Street/Wick Road	The site is identified within Hackney Core Strategy Policy 26 Open Space Network which protects open space. The LLDC Local Plan Consultation Document proposes that Local Open Space will be protected, and loss will only be accepted where re-allocated elsewhere. The site is open space and there is currently no proposal to re-allocate elsewhere. The site is public land and appears in poor quality with no public access and therefore could be deemed unsuitable for continued use as open space, subject to an Open Space audit undertaken by LLDC. However the site is owned by TfL who have confirmed that the site is not available for Gypsy and Traveller use and therefore any re-consideration of the site's use would need the site to become available. LLDC should keep the site's availability under review.
LL005	Land at Bartrip Street/Wick Road	The site is identified as a Locally Significant Industrial Site within the Hackney Wick AAP, and therefore under adopted policy the site's suitability for Gypsy and Traveller use is subject to future changes in policy. This is not a designation carried forward into the Local Plan Consultation Document. However, undesignated employment areas are protected under draft Local Plan policy 'BEE.4 Employment Uses in Other Locations', although the policy does provide a caveat that if evidence is provided to demonstrate there is no demand for the existing employment use or it is unviable then another use can be provided. Although the site is leased, this public site is in existing employment use and there is no evidence to suggest that this employment use is unviable at this time. Therefore the site is currently not available for Gypsy and Traveller use. It is recommended that LLDC review the continued employment use in future reviews of this evidence study.
LL006	Chapman Road Depot Site	The site is publicly owned by London Borough of Hackney and therefore potentially available for Gypsy and Traveller use. The site is subject to current leases on the land which is currently being used for storage. However, the site is currently protected by Hackney Core Strategy Policy 16 'Employment Opportunities 'Other Industrial Area' for employment use. It is also allocated in the LLDC Draft Local Plan, under Policy BEE3 'Locally Significant Industrial Site'. The site is otherwise potentially suitable for Gypsy and Traveller use, but as the site is allocated for employment use in current and draft policy and leased for employment purposes. Therefore the site would need LLDC to reconsider employment use in the Local Plan before submission and adoption and determine if the current lease would prevent the site coming forward in the plan period.

Site Identification Study
Gypsy and Traveller Site Study

Recommendations

- 4.2.11** The study assessed 6 sites identified by LLDC. Despite researching these potential sites, the study was unable to identify enough available and suitable sites within LLDC, to meet the Gypsy, Traveller and Travelling Showpeople needs for LLDC over the whole plan period.
- 4.2.12** There are a number of reasons the study has not identified enough sites, including the policy and physical constraints in some locations and sites not being made available for Gypsy and Traveller use. To conform to ‘Planning Policy for Traveller Sites’ LLDC will need to identify sites in the Local Plan in order to meet the need for the local travelling community within the first 5 years. **Table 4.3** below sets out supply against overall gross need defined in the GTAA and the overall gross need with the additional 20% to reflect the high existing need from bricks and mortar accommodation in Hackney.

Table 4.3: Summary of Gypsy and Traveller need and supply for LLDC in 5 year time periods

	2013-2018	2018-2023	2023-2028	Total
(a1) Need for Gypsy and Traveller Residential Pitches	11	2	2	15
(a2) Need for Gypsy and Traveller Residential Pitches (20% extra from Hackney)	18	3	3	24
(a3) Need for Gypsy and Traveller Residential Pitches (Hackney plus relocated Newham Site)	35	5	6	46
(b) Existing sites with temporary permission (plus extra capacity)	5	0	0	5
(c) New sites with potential	0	0	0	0
(d) Total potential supply (b+c)	5	0	0	5
(e) Net Need (a1-d)	-6	-2	-2	-10
(f) Net Need (a2-d)	-13	-3	-3	-19
(g) Net Need (a3-d)	-30	-5	-6	-41

- 4.2.13** It is recommended that LLDC reassess the supply of sites and continue its proactive approach to the identification of suitable sites. LLDC could revisit the allocation of sites for other uses, such as employment through quality audits of these uses across the LPA area, to establish if these sites can be released from their uses and reallocated.
- 4.2.14** Otherwise, it is recommended that LLDC will need to identify a wider source of sites and undertake a fuller site study assessment, in order to identify sites to meet the needs for the local travelling community and to maintain a 5 year supply. LLDC will also need to reassess the supply of sites over time with regular reviews of this study.
- 4.2.15** Ultimately the identification of sites will be difficult given the limited supply of available sites within the LLDC area and the competition for sites from other prospective land uses. Peter Brett Associates recommend that London Legacy Development Corporation work in partnership with the London Gypsy and Traveller Unit, local Gypsy and Traveller families, public bodies and other organisation who have a land interest in the London Legacy plan area to identify other potentially suitable and available sites for assessment.
- 4.2.16** To meet any other unidentified need through the plan period (5-15 years) and to provide a base for considering planning applications, the Local Plan should include a criteria policy.

Site Identification Study
Gypsy and Traveller Site Study

Draft Local Plan Policy H4 – Specialist Housing Needs (from 2013) included criteria for assessing planning applications. We recommend that this criteria policy is expanded to incorporate additional criteria as set out in the study methodology in section 2.

Appendix 1: Sites Location Map

Appendix 2: Design Templates

EXAMPLE: 5 PITCH PUBLIC SITE (0.72 acre)

Use of existing landscaping (such as mature hedgerows) is desirable particularly if it encourages biodiversity (generally native species) and is low maintenance. It affords a good level of privacy and security without the defensive/hostile nature of gates, walls and fences. That said, each site will need to be designed with the appropriate security measures in mind as per the Police's 'Secure By Design' Principles. There will be considerable difference in these needs between urban and rural locations, for example.

There should be at least a 3m gap within the inside of all site perimeter boundaries and a 6m gap between combustible units, which includes caravans and mobile homes, though not amenity buildings if made out of non-combustible materials.

Specific additional space available for scrap storage can be well used (e.g. Piddlehinton Gypsy Site)

A site manager's office is ideally located near the entrance for ease of access and is of a size to accommodate an office, a kithenette, a bathroom and a storage room.

Government guidance suggests that amenity buildings should include:

- water closet (basin, toilet, bath/shower)
- (open plan) kitchen/dining/living area
- secure storage space for harmful substances/medicines
- enclosed storage for food, broom, washing/cleaning items
- space for cooker, fridge/freezer & washing machine

We suggest also that a large porch, veranda or other covered outdoor space would be useful given the limited indoor living space and the relatively high levels of cloud cover and precipitation in this country.

Access routes will need to accommodate all vehicles that need access to the site. In this case tracking would need to be carried out to ensure that there is sufficient turning space for a large mobile home. Standards for refuse and fire truck access will need to be met too. Again, in this case space for safe stopping only is needed as the site is small enough to ensure that distance to refuse collection points and hose length standards are met. These standards and others can be found in Building Regulations and Manual for Streets.

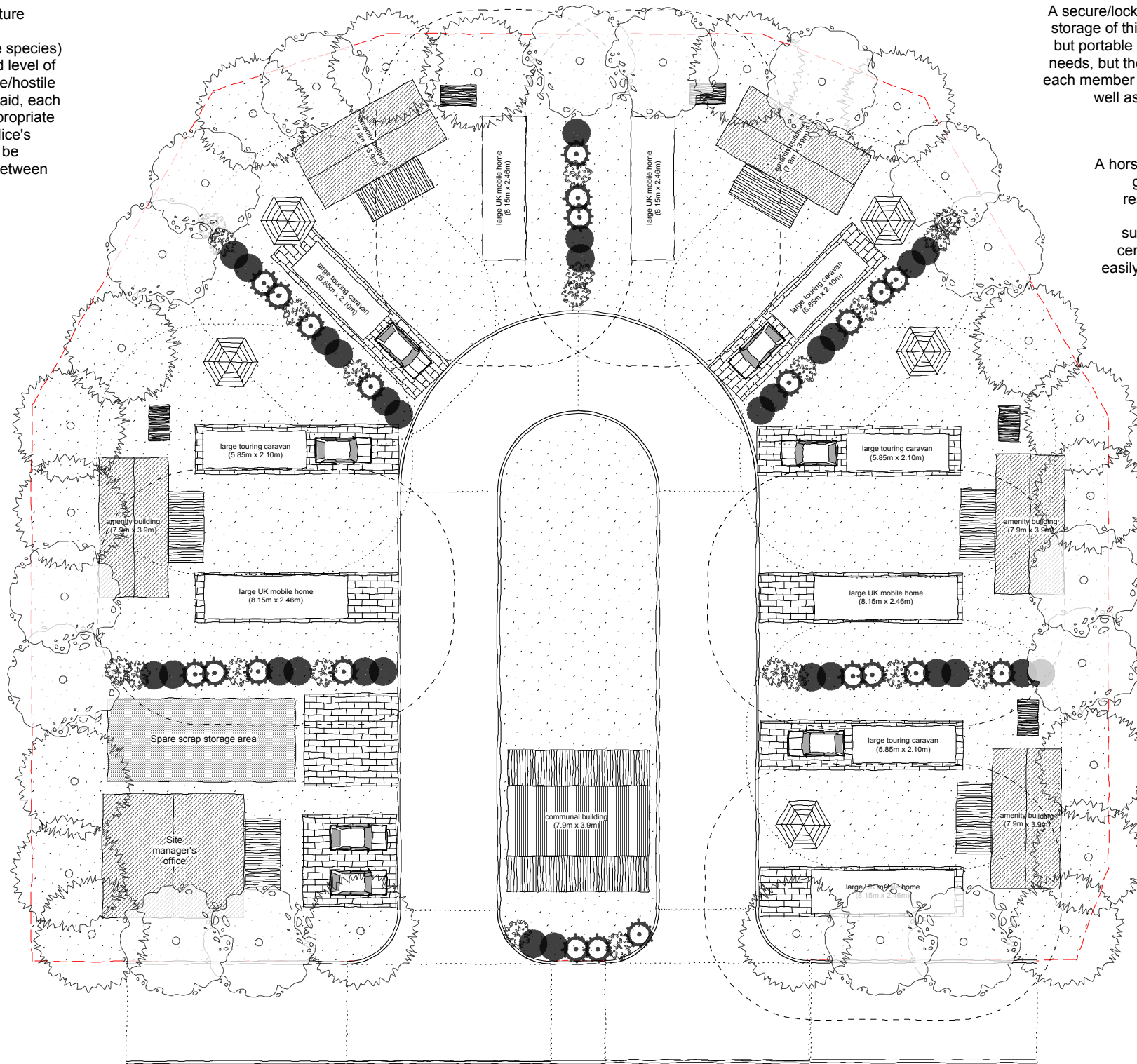
A secure/lockable shed should be provided for storage of things like bicycles and other large, but portable equipment. Size is dependent on needs, but there should be sufficient space for each member of the family to have a bicycle as well as any other gardening equipment.

A horseshoe layout is recommended in government guidance as it allows residents to look out for each other while at the same time affording sufficient privacy. It also provides a central play area/open space that is easily visible from each of the pitches.

Some families will also have need of grazing land for their horse(s). Minimum spaces are for 1 horse to 1 acre (or 0.5 acre for ponies or horses under 14.2 hands)

Living quarters should generally not be overlooked by neighbours so some further hedging may be necessary

A communal building may be needed where an existing building is inaccessible. This is particularly useful for larger sites. It can be an important resource in sustaining a more remote site, offering an opportunity for health visitors, youth workers and education services, as well as for use by residents and the site manager.



No.	Date	Appr	Revision Notes
-64	Jan 2011		Issue Note
No.	Date		Issue Notes
Design Firm			BAKER ASSOCIATES
Consultant			The Crescent Centre Bristol BS1 6EZ
Project Title			Dorset GTTS DPD
Sheet Title			6 Pitch Site
Project Manager		Project ID	
Mark Russell		a483	
Drawn By		Scale	
Daniel Black		1:300 @ A3	
Reviewed By		Sheet No.	
N/A		Sheet No. 2	
Date		of	
Date		6	
CAD File Name			
a483/002/Rev1			