

Gypsy and Traveller Sites

Site Identification Study

On behalf of **Luton Borough Council**



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Important notice:

Following the completion of the Site Identification Study, national Government issued a revised 'Planning policy for traveller sites' (August 2015).

This study has therefore been undertaken under the original 2012 'Planning policy for traveller sites'.

It is important that the Council consider the impact of the change in definition may have on the overall assessment of needs for the travelling community, as well as the impact on the assessment as potential sites.

1 Introduction and Background

1.1 Introduction

- 1.1.1 Luton Borough Council (the Council) has appointed Peter Brett Associates LLP (PBA) to provide advice on the delivery of pitches and plots, which will help to identify sites required to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople identified in the forthcoming Accommodation Needs Assessment which is being undertaken by Opinion Research Service (ORS). The objective of this study is to identify and assess potential sites to determine if they are suitable, available and achievable.
- 1.1.2 The results of this study will inform the development of relevant policies and allocations in the emerging Local Plan and guide the consideration of future planning applications for Gypsy, Traveller and Travelling Showpeople sites.

1.2 Background

- 1.2.1 The National Planning Policy Framework (NPPF) requires the Council to plan for a mix of housing when developing Local Plans and other Local Development Framework (LDF) Development Plan Documents (DPD), such as site allocation documents.
- 1.2.2 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:
- 1.2.3 *“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).*
- 1.2.4 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.
- 1.2.5 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.
- 1.2.6 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Act.
- 1.2.7 Travelling Showpeople have traditionally been involved in holding fayres and circuses for many hundreds of years. For the purposes of the planning system, Travelling Showpeople means:
- “Members of a group organised for the purposes of holding fayres, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their family’s or dependent’s more localized pattern of trading, educational or health needs or old*

age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.” (Planning Policy for Traveller Sites, CLG, March 2012).

1.3 National policy

- 1.3.1 The Government published policy statement ‘Planning policy for traveller sites’ in 2012, replacing Circulars 01/2006 and 04/2007 to address future accommodation needs of 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.
- 1.3.2 In 2014, Department for Communities and Local Government published a consultation document ‘Planning and Travellers’, with an accompanying Equalities Statement. At present this is not adopted national policy. Until new national policy is adopted, the ‘Planning policy for traveller sites’ (2012) remains the national policy for Gypsy and Traveller sites.
- 1.3.3 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.
- 1.3.4 National policy for Gypsies and Travellers is contained within ‘Planning policy for traveller sites’. This identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years or developable within years 6-15, sites should be:
- Suitable - the site should be in a suitable location for development;
 - Available - the site should be available now or there should be a reasonable prospect that the site will be available at the point envisaged;
 - Achievable - there is a realistic or reasonable prospect that a Gypsy and Traveller or Travelling Showpeople site could be viably developed at the point envisaged.
- 1.3.5 Local planning authorities should identify sufficient deliverable sites to provide five years’ worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth.
- 1.3.6 National policy recommends that criteria based policies should be developed irrespective of whether need is identified or not. If need is identified they should be used to guide land allocations, while if there is no identified need they should provide a basis for determining planning applications which may nevertheless come forward.
- 1.3.7 Criteria “should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community” (para. 10). 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. This is one of the principal reasons why the Government is no longer relying simply upon criteria based policies to bring forward suitable sites for Gypsies and Travellers, and instead placing the focus upon local authorities to identify specific deliverable sites to provide for identified need.
- 1.3.8 ‘Planning policy for traveller sites’ identifies a series of policies to ensure that traveller sites are sustainable; economically, socially and environmentally. Specific policies set out the national approach for: sites in rural areas and the countryside (Policy C); rural exception sites (Policy D); sites in Green Belt (Policy E); mixed planning use sites (Policy F); major development projects (Policy G); and determining planning applications (Policy H).

1.4 Local policy

Luton – Local Policies

- 1.4.1 The adopted Luton Local Plan (2001 – 2011) includes Policy H8 Sites for Gypsies/Travellers, as set out below:

Policy H8: Sites for Gypsies/Travellers

Planning permission will be granted for permanent or transit Gypsy/ Traveller sites if:

- [A] the site has reasonable access to shops, schools and other facilities; and
- [B] the site has adequate road access and is well related to the primary road network; and
- [C] the site is on previously developed or underused land and is not allocated for another use; and
- [D] hardstanding and basic facilities, including electricity, water supplies, sewage disposal and waste collection, are provided on site; and
- [E] there would be no unacceptable effect on the environment.

- 1.4.2 Draft Luton Local Plan (2011-2031) went out for public consultation in June 2014, and included draft Policy LP20 Gypsies, Travellers and Travelling Showpeople, as set out below:

Draft Policy LP20: Gypsies, Travellers and Travelling Showpeople

The existing Gypsy and Traveller site at St Thomas's Road and Travelling Showperson site at 14 Wigmore Lane are safeguarded for these purposes (as identified on the policies map).

Gypsy and Traveller and Travelling Showpeople pitches and plots, including provision for a transit Gypsy and traveller site, will be permitted or allocated in accordance with current government policy to meet the needs identified in the Gypsies and Travellers Accommodation Assessments, updated as necessary.

Planning permission will be granted for permanent or transit Gypsy/ Traveller provision where the following criteria can be met:

- i. the site has reasonable access to shops, schools and other facilities; and
- ii. the site has adequate road access and is well related to the primary road network; and
- iii. the site is on previously developed or underused land and is not allocated for another use; and
- iv. hardstanding and basic facilities, including electricity, water supplies, sewage disposal and waste collection, are provided on site;
- v. there would be no unacceptable effect on the environment; and
- vi. in the case of Travelling Showpeople sites, the site includes sufficient space for storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers.

- 1.4.3 Recommendations on Local Plan policy criteria for Gypsy, Traveller and Travelling Showpeople sites are set out in this report, in **Section 4**.
- 1.4.4 The adopted and emerging draft Local Plan policy criteria, relating to Gypsy, Traveller and Travelling Showpeople sites, has informed the development of site assessment criteria used in this study. The methodology used to assess sites is provided within **Section 3**.

1.5 Other policy and guidance

1.5.1 The following guidance was also considered when developing site criteria:

- Communities and Local Government (CLG) Best Practice Guidance: Designing Gypsy and Traveller Sites (2008); and
- The Showmen's Guild of Great Britain 'Model Standard Package'.

2 Existing Sites and Needs

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, Travellers and Travelling Showpeople 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 and plot 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.
- 2.1.3 The Council has commissioned ORS to carry out a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA); the objective of that assessment being to identify the number of Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs to the end of the Local Plan. The GTAA provides evidence to address the first two requirements set out above.
- 2.1.4 The Gypsy and Traveller Site Identification Study seeks to identify and assess potential sites to meet any needs that may be identified in the GTAA. PBA's objective is to provide evidence to support the Council to identify and allocate sites and establish criteria policy in the emerging Local Plan.

2.2 Existing sites

Gypsies and Travellers

- 2.2.1 Residential sites provide residents with a permanent home and can be privately owned, publicly rented for affordable pitches, or privately rented to Gypsies and Travellers. The size and the amount of facilities available on these sites vary between sites.
- 2.2.2 Sites are made up of a number of caravan pitches and associated facilities. Although there is no national definition of what size a pitch should be, a general guide contained in *Designing Gypsy and Traveller Sites*¹ states that "an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan... drying space for

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

clothes, a lockable shed...parking space for two vehicles and a small garden” (para 7.12). On average, usage is approximately 1.7 caravans per pitch.

2.2.3 Residential sites provide a permanent home and the amount of facilities on site varies mainly between public and private sites. Public sites will generally have amenity blocks and sometimes play areas and communal spaces. Private site facilities vary enormously depending on the requirements of the residents.

2.2.4 In Luton there is one existing public Gypsy and Traveller site currently providing residential Gypsy and Traveller pitches. The site has full planning permission for 20 pitches and it is currently full.

Table 2.1: Existing Gypsy and Traveller Site in Luton

Site No.	Site Name	Settlement	Planning Status	Green Belt location
LUT011	St Thomas’s Road	Luton	Current authorised	Outside Green Belt

2.2.5 There are no privately owned Gypsy and Traveller sites in Luton.

Travelling Showpeople

2.2.6 The needs of Travelling Showpeople are different to Gypsies and Travellers. Their sites often combine residential, storage and maintenance uses. Typically a site contains areas for accommodation, usually caravans and mobile homes, and areas for storing, repairing and maintaining vehicles and fairground equipment. Sites are often known as yards. Individual family areas (within a site/yard) are known as plots.

2.2.7 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots are also occupied throughout the year, often by older people and families with children, for example. The Showmens Guild ‘Model Standard Package’ provides model standards and site considerations for developing and planning for Travelling Showpeople sites.

2.2.8 In the Luton area there are currently two privately owned and occupied Travelling Showpeople sites.

Table 2.2: Existing Travelling Showpeople Sites in Luton

Site No.	Site Name	Settlement	Planning Status	Green Belt location
LUT013	14 Wigmore Lane	Luton	Tolerated site	Outside Green Belt
LUT024	77 Wigmore Lane	Luton	Current authorised	Outside Green Belt

2.3 Luton Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

2.3.1 A new Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) has been completed by consultants Opinion Research Services (ORS) for Luton Borough Council.

2.3.2 As part of that study, interviews were attempted with every Gypsy and Traveller household in the area who were present during the fieldwork period in April 2015.

2.3.3 The GTAA estimates that the extra site provision to meet residential needs between 2015 and 2030 for Luton Borough is 14 pitches. This includes the need of existing households on encampment sites; households on the waiting list for a public site; and new households likely

to occur by 2030 due to new household formation from within the existing community. The majority of the pitches will be required for public provision.

2.3.4 There is no further need identified in the GTAA for additional Travelling Showpeople households between 2015 and 2030.

2.3.5 **Table 2.3** below sets out the GTAA need for Luton Borough in 5 year time periods:

Table 2.3: GTAA need for Luton Borough in 5 year time periods

	2015-2020	2020-2025	2025-2030	Total
Gypsy and Traveller Residential Pitches	6	4	4	14
Travelling Showpeople Plots	0	0	0	0

2.3.6 There are currently no operational public transit sites in the Luton Borough. The GTAA identifies a need for one publicly provided transit site to be delivered by 2030 for 10 pitches.

2.4 Number of Sites Required

2.4.1 The number of sites required will be determined according to a number of factors including taking account of:

- The needs identified for each travelling group in the Luton GTAA;
- The different cultural, ethnic and family groupings of Gypsies and Travellers and Travelling Showpeople; and
- The extent to which additional provision could be made through extension or intensification of existing sites.

2.4.2 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 guidance 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).

2.4.3 However, in Luton there are no current private sites and only one public site which is authorised for 20 pitches. The GTAA did not identify any unauthorised site in Luton, although there are 2 extended family groups living in 12 caravans on roadside encampments across Luton and neighbouring areas. Therefore it is likely that the majority of need will be for public site provision.

3 Methodology

3.1 Methodology

3.1.1 This section sets out the methodology PBA have followed to complete the site assessment study, to identify sites to meet Gypsy, Traveller and Travelling Showpeople needs and establish site criteria for planning policy. The methodology has been informed by national policy. It was consulted upon, and all comments received were fully considered before the methodology was finalised and applied to potential sites.

3.2 Task 1: Policy Review

3.2.1 A review of national and local policy, relevant to planning for Gypsy and Traveller and Travelling Showpeople sites, was undertaken to inform the site assessment criteria. The review of national and local policy is set out within **Section 1** of this report.

3.3 Task 2: Sources of Sites

3.3.1 The Council provided a list of sites to be assessed, as set out below:

- *Authorised sites* – The Council identified one public Gypsy and Traveller site and two Travelling Showpeople sites to be assessed in the study;
- *Sites shortlisted for Gypsy and Traveller use, in a previous study undertaken by the Council* - All sites previously shortlisted by the Council for Gypsy and Traveller use was assessed in the study. The Council confirmed the availability of all sites for Gypsy and Traveller use; and
- *Luton Borough Council owned land* – PBA undertook an initial sieve of Luton Borough Council owned land, removing all unavailable or incidental public land, such as public buildings, public open space, active waste facilities and highway verges. The Council confirmed the sites to be assessed in the study.

3.4 Task 3: Site Assessment (Stage 1)

3.4.1 Based upon our review of available policy, guidance and physical constraints, PBA identified a series of site criteria for discussion and agreement with the Council. We used the criteria to assess potential sites, which has also informed the recommended policy criteria for assessing planning applications, set out in **Section 4**.

3.4.2 The site criteria was developed and applied in two stages, **Stage 1** is set out below.

3.4.3 **Stage 1** in the assessment process involved a desk top study undertaking the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.

3.4.4 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 international environmental designations or within the boundaries of scheduled ancient monuments, etc.

3.4.5 Availability was identified throughout this study as a key criterion. Confirmation of the availability of sites, for either Gypsy and Traveller or Traveller Showpeople development, was undertaken by the Council.

- 3.4.6 PBA used a traffic light approach for the initial **Stage 1** desk top assessment, identifying where sites did not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria were satisfied in green.
- 3.4.7 There are inherent conflicts between national planning policy on Green Belt and the requirement to meet the needs of the travelling community. PBA consider that an important distinction needs to be made between the consideration of national policy in a planning application and a Local Plan preparation context. Local authorities have a statutory requirement to identify sites to meet the locally defined needs for Gypsy, Traveller and Travelling Showpeople and whilst speculative planning applications for sites in the Green Belt, would be considered inappropriate development except in exceptional circumstances, PBA consider that a Council is able to identify and allocate a site in Green Belt through the plan-making process. The clear difference is that the Council would then have considered all other site options outside the Green Belt and therefore need combined with evidence on the site's potential suitability (specifically impact on Green Belt purposes) and the lack of availability of suitable site alternatives in non-Green Belt locations would provide the justification.
- 3.4.8 **Table 3.1** overleaf sets out the **Stage 1** Assessment Matrix.

Table 3.1: 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 3a and/or 3b and is not suitable for Gypsy and Traveller use.	The site is affected by Flood Zone 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.
Green Belt	Green Belt	n/a	The site is within the Green Belt and could therefore have a negative impact requiring further investigation.	The site is not located in the Green Belt.
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 unstable, and the land has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There is 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 potential development.
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.

Criteria	Designation/Issue	Red (Sites does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Historic Environment	Scheduled Ancient Monument (SAM) Sites of Archaeological Importance Historic Park and Garden Conservation Area Listed Building	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.	The site could result in harm to elements which contribute to the significance of a designated heritage asset or its setting, which requires further investigation.	The site is unlikely to harm the significance of any designated heritage asset or its setting.
Availability	Promoted sites, public land ownership, etc.	The owner has confirmed to the Council that the site is not available, nor is it likely to be available in the future.	Site availability is unknown and requires further investigation. Public owned sites deemed potentially available for Gypsy and Traveller use unless informed otherwise.	The Council has confirmed that the landowner is willing to sell or develop the site as a Traveller site.

3.4.9 All sites which did not receive a “red” at **Stage 1** were considered further at **Stage 2**. **Stage 2** involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues were also investigated.

3.5 Task 4: Detailed Site Assessment (Stage 2)

3.5.1 All sites were visited by the consultant team. Before any survey work was undertaken the list of specific sites to be visited was agreed with the Council.

3.5.2 We assessed the suitability, availability and achievability of these sites in detail.

- In terms of **suitability** we assessed each site against the agreed criteria which were broadly grouped into policy requirements, physical constraints and potential impacts.
- In terms of **availability** the Council contacted landowners to identify whether sites are available and identified any legal or ownership constraints.
- In terms of **achievability** we identified potential abnormal site constraints needing to be rectified which may affect viability and any potential alternative uses likely to affect deliverability.

3.5.3 **Stage 2 Matrix** in **Table 3.2**, overleaf, provides the details for how we generally assessed sites relating to suitability, availability and achievability. Each site identified with potential for Gypsy and Traveller use has a site assessment proforma, providing more detailed information, including a site map. All sites identified with no potential for Gypsy and Traveller use are included in a ‘sites with no potential’ list. Both reports are within the report appendices.

3.5.4 An accessibility assessment has also been undertaken looking at the proximity of potential sites to key services and facilities, including primary school and General Practice Surgery. Accessibility tends to be used to identify relatively more sustainable sites, if there is a pool of sites for the Council to choose from and is in a position to choose sites to meet its 5 years supply. However, it should be noted that Luton is mainly an urban area and therefore no one site should be rejected on accessibility issues alone.

3.5.5 All **Stage 2** sites were sent to the Council for comments from relevant officers. Officers were asked to comment on each site, to whether Gypsy and Traveller or Travelling Showpeople development ‘in principle’ would have any implications, relating to their area of expertise. This included whether there were any absolute constraints or whether there were mitigation measures that needed to be considered for any potential sites. If not already considered in **Task 3**, Property Services were asked to provide information relating to Council owned land, including any restrictions, such as existing leases. All comments were collated by the Council and provided to PBA. We sought site comments from the following service areas at **Stage 2**:

- Highways;
- Development Management;
- Ecology;
- Historic Environment;
- Property Services; and
- Environmental Health.

- 3.5.6 A landscape appraisal of all sites, which lie outside the built up area of Luton, was undertaken by Enderby Associates. Enderby Associates assessed sites in relation to potential impacts on landscape character and the purposes of the Green Belt.
- 3.5.7 Issues such as site and residential amenity were conducted on a subjective basis, considering issues such as proximity; overlooking from windows; and initial views on the noise and pollution impacts of uses, such as employment, railways, sewerage works, roads and electricity pylons. It did not include specific noise and air quality monitoring.
- 3.5.8 The **Stage 2** criteria is set out in **Table 3.2** overleaf and was conducted based on the available information at the time of study.

Table 3.2: Stage 2 Assessment Process

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	Stage 2	<p>Site promoted by landowners, agents or travelling community</p> <p>Public land confirmed as available</p>	<p>Site not available for Gypsy, Traveller or Travelling Showpeople use.</p> <p>There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved.</p> <p>Public land has been identified in another plan / strategy for another use.</p>	<p>There continues to be doubt over whether the site is genuinely available for Gypsy, Traveller or Travelling Showpeople (GTTS) use after further investigations.</p>	<p>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.</p> <p>There are no known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the Local Plan.</p> <p>Public site is not identified in a plan or strategy for another use.</p>
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 access and safety	Stage 2	Access Proximity to major roads	<p>Poor access and/or road of poor standard.</p> <p>Likely to be subject to safety issues from surrounding uses incapable of mitigation.</p>	<p>Access poor but capable of being improved.</p> <p>Road of adequate or good standard.</p> <p>Likely to be affected by safety issues but this is capable of mitigation.</p>	<p>Adequate or good access off road.</p> <p>Not affected by safety issues.</p>

Accessibility to facilities	Stage 2	<p><i>Access to facilities:</i> GP Surgery Primary School Shop</p> <p><i>Access to public transport:</i> Bus stop or route Train station</p>	Actual distances to facilities will be measured.		
Potential impacts					
Green Belt	Stage 2	Green Belt	Unacceptable impact of site upon Green Belt not capable of mitigation.	Impact capable of mitigation. Potential cumulative impact with other identified sites.	No unacceptable impact on Green Belt.
Landscape Character	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	<p>Impact on biodiversity resources or known protected species</p> <p>Site of Special Scientific Interest</p> <p>Local Nature Reserve</p> <p>Geological Conservation Review Site</p> <p>Sites of Importance for Nature Conservation</p>	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.
Historic environment	Stage 2	<p>Scheduled Ancient Monuments</p> <p>Listed Buildings</p> <p>Historic Parks and Gardens</p> <p>Conservation Areas</p> <p>Heritage assets (local)</p>	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.
Air	Stage 2	Air pollution from surrounding uses e.g. road transport	Likely to be adversely affected by air pollution from surrounding uses that could make for an unacceptable residential environment.	Likely to be affected by air pollution but affect is unknown and requires further investigation.	Not affected by air issues.
Neighbouring 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.
Achievability					
Achievability	Stage 2	Deliverability Viability	<p>The site is not available and/or suitable for Gypsy, Traveller or Travelling Showpeople uses.</p> <p>Site constraints or ownership issues that are unlikely to be capable of resolution without considerable expense.</p>	<p>There continues to be doubt over whether the site is available in the short term, but evidence that it may be available in the medium/long term for Gypsy, Traveller or Travelling Showpeople use after further investigations.</p> <p>Site constraints capable of being overcome but where extent and cost of mitigation are unclear at this stage.</p>	<p>No site constraints needing to be overcome.</p> <p>The site is available for Gypsy, Traveller or Travelling Showpeople uses.</p> <p>There are no site constraints or ownership issues that are likely to make the site unviable.</p>

3.5.9 **Assessment Conclusion:** Taking all the information into account, each site was identified within the classifications below:

- **Sites with Potential beyond the Green Belt at Stage 2:** Sites were identified beyond the Green Belt, which are suitable, available and achievable for Gypsy and Traveller or Travelling Showpeople development.
- **Green Belt Sites with Potential at Stage 2:** There were no sites identified within the Green Belt, which are suitable, available and achievable for Gypsy and Traveller or Travelling Showpeople development.
- **Sites with No Potential at Stage 2:** Sites which were identified as unsuitable and/or unavailable for Gypsy and Traveller and Travelling Showpeople uses.

3.5.10 The following matrix was employed to estimate when development might start.

Table 3.3: Matrix to Estimate Delivery Timings

		Achievability	
		No concerns	Concerns can be resolved
Availability	No concerns	Years 1 to 5	Years 6 to 10
	Concerns can be resolved	Years 6 to 10	Years 11+

3.6 Task 5: Strategy and Delivery

3.6.1 There is policy and delivery related issues which have had a bearing on the final site recommendations. These relate to:

- The distribution of sites relative to the preferred spatial strategy and identified needs arising from the needs assessment;
- Providing a range of sites for different Gypsy and Traveller communities;
- Meeting affordable pitch needs;
- The split between public and private provision;
- Meeting the need for a range of site sizes;
- Building in natural growth;
- Providing a pool of sites for phasing to ensure the availability of sites through the life cycle of the Local Plan; and
- Identifying a shortlist of sites against the plan period between 2015 and 2020, providing sites to meet the 5 year supply. It may be that or subsequent periods of the Local Plan (up to 2030) broad locations may be required.

3.6.2 We explored a number of potential delivery models for sites to ensure that the identified sites are demonstrably deliverable.

4 Site Assessment and Capacity

4.1 Source and number of sites assessed

- 4.1.1 All sites identified for assessment at Stage 1, were identified from the source of sites within para 3.3.1. This resulted in a total of 23 sites being assessed at Stage 1.
- 4.1.2 This included all existing authorised Gypsy and Traveller sites (1 site) and Travelling Showpeople sites (2 sites). It also included 15 publicly owned sites; and 5 privately owned sites. All sites were confirmed by the Council for consideration at Stage 1.
- 4.1.3 All 23 sites were mapped onto GIS and put into a sites database. A map of the Luton local authority area is contained at **Appendix A** showing the distribution of sites subject to assessment.

4.2 Capacity

- 4.2.1 In this section a list of sites is identified which are considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. All potentially suitable sites have been subject to an initial broad assessment of the number of pitches which could be provided on site. This has taken account, firstly, of:
- Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008);
 - Travelling Showpeople's Sites Model Standard Package (The Showmen's Guild of Great Britain, 2007);
 - Any relevant planning history.
- 4.2.2 In addition, PBA have developed templates for various forms of Gypsy and Traveller development, including for residential and transit sites. These have been used to inform the theoretical capacity of sites and optimum size and configuration of pitches (or plots) on site. On larger sites a mix of pitch sizes to reflect the needs of different families can be assumed. Relevant design templates are set out in **Appendix E**.
- 4.2.3 The shortlisted sites have been assessed for their capacity to accommodate residential uses for Gypsy and Traveller sites and mixed residential/commercial uses for Travelling Showpeople.

4.3 Stage 1 Suitability and Availability Matrix

- 4.3.1 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.
- 4.3.2 The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Appendix B**. A 'traffic light' approach has been used to undertake an initial assessment of sites, to identify where sites do not satisfy criteria as red; where criteria may be capable of being satisfied as yellow; and where criteria are satisfied as green.
- 4.3.3 Sites identified as red have not gone forward to be assessed at **Stage 2**. One site was rejected at **Stage 1** and therefore 22 sites were examined further at **Stage 2**.

4.4 Stage 2 Suitability, Availability and Achievability Site Assessments

- 4.4.1 **Stage 2** involved a more detailed assessment of suitability, availability and an examination of achievability issues.

4.4.2 **Appendix C** sets out those sites where it is considered there is no potential for further provision and the reasons for this decision. **Appendices D** sets out the detailed site assessment results for those sites considered potentially suitable, available and achievable for future provision beyond and within the Green Belt.

Potential Sites Outside the Green Belt

4.4.3 There is 1 site located beyond the Green Belt identified as potentially available and suitable to contribute additional pitches towards meeting future identified needs for Gypsies and Travellers. Results are set out in **Table 4.1** below.

Table 4.1: Site with Potential outside the Green Belt for Gypsies and Travellers in Luton

Site No.	Site Name	Settlement	Existing Provision	Further Capacity	Use
LUT009	Plot 1, Chaul End Lane	Luton	0	3	Gypsy and Traveller

4.4.4 Further details on the potential site outside of the Green Belt is set out in **Appendix D** and considered in **Section 5**.

Potential Sites Within the Green Belt

4.4.5 There is 1 site located within the Green Belt identified as potentially available and suitable to contribute additional pitches or plots towards meeting future identified needs for Gypsy, Traveller and Travelling Showpeople. Results are set out in **Table 4.2** below.

Table 4.2: Site with Potential within the Green Belt for Gypsies and Travellers in Luton

Site No.	Site Name	Settlement	Existing Provision	Further Capacity	Use
LUT012	Luton Regional Sports Centre	Luton	0	12	Gypsy and Traveller

4.4.6 Further details on the potential site within the Green Belt is set out in **Appendix D** and considered in **Section 5**.

5 Recommendations and Delivery Options

5.1 Pitch and Plot Targets

- 5.1.1 'Planning policy for traveller sites' (CLG, 2012) requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, to meet likely permanent and transit site accommodation needs arising in each area.
- 5.1.2 The Luton Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA), completed by ORS in 2015 details the total identified need for new permanent residential and transit Gypsy and Traveller pitches and Travelling Showpeople plots to meet residential needs between 2015 and 2030 to address the needs of all identifiable households in Luton Borough. The results are set out in **Table 5.1** below:

Table 5.1: GTAA need for Luton Borough in 5 year time periods

	2015-2020	2020-2025	2025-2030	Total
Gypsy and Traveller Residential Pitches	6	4	4	14
Travelling Showpeople Plots	0	0	0	0

- 5.1.3 There are currently no operational public transit sites in Luton Council area. It is a unitary authority and therefore police are unable to direct unauthorised caravans to transit sites outside of the local authority area. The Luton GTAA identifies a need for one publicly provided transit site to be delivered in Luton for 10 pitches.
- 5.1.4 The Council is now in a position to include local targets in its emerging Local Plan to reflect the pitch targets identified in the Luton GTAA.

5.2 A Supply of Deliverable and Developable Sites

- 5.2.1 In developing the Local Plan, 'Planning policy for traveller sites' (CLG, 2012) requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites, sufficient to provide five years' worth of sites against those locally set targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.
- 5.2.2 PBA recommend that to address the requirement to ensure that identified need is met throughout the Plan period, the Council should consider the following:
- Safeguard existing sites to prevent their loss to other uses and increase the identified pitch/plot requirement for the local authority area; and
 - Allocate new sites.

5.3 Safeguarding Existing Sites

- 5.3.1 It is suggested that, as an initial starting point, the Council should safeguard existing authorised Gypsy, Traveller and Travelling Showpeople sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may be required to be found.
- 5.3.2 There is one existing public Gypsy and Traveller site with full permission within Luton. It is recommended that this site is safeguarded in the Local Plan to ensure its continued use.

Table 5.2: Safeguarding Existing Authorised Gypsy and Traveller Site in Luton

Site ref	Site Name	Settlement	Existing Provision
LUT011	St Thomas's Road site	Luton	20 pitches

- 5.3.3 There are two existing Travelling Showpeople sites with full permission within Luton. It is recommended that these sites are safeguarded in the Local Plan to ensure their continued use.

Table 5.3: Safeguarding Existing Authorised Travelling Showpeople Sites in Luton

Site ref	Site Name	Settlement	Existing Provision
LUT013	14 Wigmore Lane	Luton	6 caravans*
LUT024	77 Wigmore Lane	Luton	Use of site

*The site had temporary planning permission (00/01276/REN) for 6 residential caravans, on the 11 Jan 2001 for 5 years, which expired in Jan 2006. The site could be classified as a tolerated site (since the last temporary permission expired) and would be subject to a certificate of lawful use from January 2016.

- 5.3.4 From the site survey it is clear that the existing Gypsy and Traveller and Travelling Showpeople sites are currently in use and are occupied. There appear to be no reasons why these sites should not be safeguarded in the Luton Local Plan. Safeguarding these sites will prevent their loss to other uses and ensure new site provision meets new identified needs.

5.4 Site Delivery Options

- 5.4.1 A number of potential delivery models have been explored and were considered for potential suitable sites. These include:
- 5.4.2 **Model 1** – Firstly, there may be sites where managed public provision of affordable rented pitch provision is appropriate. In this case, the Council should investigate the potential for either developing public assets or buying sites using grant monies to secure affordable provision. Sites can either be managed by the Council or by a RSL.
- 5.4.3 **Model 2** – Secondly, there may be sites which are not currently owned by Gypsy, Traveller and Travelling or Travelling Showpeople families but which have potential to be developed for such uses. Allocation in the Local Plan would identify these sites to travelling communities and they could be purchased on the open market. Alternatively the Council could consider using finance or grants to buy the site or identify their own public assets and then make them available to organised Gypsy and Traveller groups on a non-profit making basis for them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to provide further sites. There are emerging examples of innovative acquisition and funding arrangements in other areas.
- 5.4.4 **Model 3** – Finally, the Council could pursue the option of seeking Gypsy and Traveller provision on large mixed use urban extension sites and there may be the opportunity to require large housing allocations in the Local Plan to provide for (residential or transit) Gypsy and Traveller pitches or Travelling Showpeople in the interests of creating mixed and balanced communities. These pitches could then be sold on the open market or affordable pitches brought forward and managed by the Councils or RSLs.

5.5 Sites with Potential (outside the Green Belt)

- 5.5.1 There is one site which has been identified, outside of the Green Belt, as potentially available and suitable for Gypsy and Traveller development. **Table 5.4** sets out the potential site for allocation. Full assessment of the site is contained in **Appendix D**.

Table 5.4: Site with Potential outside the Green Belt in Luton

Site Ref	Site Name	Existing authorised pitches / plots	Additional pitches / plots	Plots / Pitches 2015-2020	Plots / Pitches 2021-2030	Delivery option	Use
LUT009	Plot 1, Chaul End Lane	0	3	0	3	Model 2	Gypsy and Traveller
TOTAL			3	0	3		

5.5.2 The study has identified no sites with potential for transit Gypsy and Travellers use outside the Green Belt.

5.6 Sites with Potential (within the Green Belt)

5.6.1 There is one site which has been identified, within the Green Belt, as potentially available and suitable for Gypsy and Traveller development. **Table 5.5** sets out the potential site for allocation. Full assessment of the site is contained in **Appendix D**.

Table 5.5: Site with Potential within the Green Belt in Luton

Site Ref	Site Name	Existing authorised pitches / plots	Additional pitches / plots	Plots / Pitches 2015-2020	Plots / Pitches 2021-2030	Delivery option	Use
LUT012	Luton Regional Sports Centre	0	12	12	0	Model 1	Gypsy and Traveller

5.6.2 The study has identified no sites with potential for transit Gypsy and Travellers sites within the Green Belt.

5.7 Meeting the Needs (outside and within the Green Belt)

5.7.1 The Luton Gypsy, Traveller and Travelling Showpeople Local Needs Accommodation Assessment 2015 (GTAA) identifies a need for 14 net additional Gypsy and Traveller residential pitches to be developed by 2030. The GTAA also identifies a need for 1 additional site, for 10 pitches, for transit provision in Luton Borough by 2030.

5.7.2 **Table 5.6** sets out a summary of need and supply beyond and within the Green Belt for Gypsy and Traveller sites in Luton Borough.

Table 5.6: Gypsy and Traveller need and supply in 5 year time periods

	2011-2020	2020-2025	2025-2030	Total
(a) Need for Gypsy and Traveller Residential Pitches	6	4	4	14
(b) Sites with potential outside of the Green Belt	0	3	0	3
(c) Sites with potential within the Green Belt with no significant effect	12	0	0	12
(d) Total potential supply (b+c)	12	3	0	15
(e) Shortfall/Surplus	+6	-1	-4	-1

- 5.7.3 The study has identified enough pitches to meet identified need in the next 10 years of the time periods identified in the GTAA. There is a shortfall of 1 pitch in the time period 2025 – 2030.
- 5.7.4 PBA would recommend allocating all sites identified with potential in **Appendix D**, outside and within the Green Belt, to contribute to meeting the needs within Luton Borough.
- 5.7.5 Recommendations to help address the shortfall of pitches to meet the need identified for a transit Gypsy and Traveller site is set out below.

5.8 Identifying Unmet Need for a Transit Site

- 5.8.1 This study has not been able to find any sites to meet the transit needs of 10 pitches, as identified in the GTAA. PBA recommend that to address any unmet transit need, the Council should consider the following to help identify a site:
- Allocate provision for a Gypsy and Traveller transit site as part of strategic allocated site; and
 - Work closely with neighbouring local authorities to potentially deliver Luton's transit need within other local authority areas.

Strategic Allocated Sites

- 5.8.2 A number of authorities around the country are now planning for future Gypsy and Traveller provision through this delivery option. There is the potential to deliver a transit site within an urban extension or strategic site. All strategic allocations should be explored for their potential to provide Gypsy and Traveller transit provision.
- 5.8.3 A Gypsy and Traveller site could be required to be provided within a strategic site, and this requirement set out as policy within the Local Plan.
- 5.8.4 Delivery of provision as part of a strategic site will need to be carefully considered to determine capacity and ensure that both site viability and implementation of Council policy, such as affordable housing or code for sustainable homes requirements, are not undermined.
- 5.8.5 Moreover, it is noted that it is potentially possible that the proposed allocated site is considered unavailable for Gypsy and Traveller uses by the developer, and therefore a policy requirement in the Local Plan would need to be introduced to ensure delivery in particular areas.
- 5.8.6 In particular, there are currently no transit sites in Luton. Within a unitary authority, the police cannot direct unauthorised encampments to other local authority sites. This study has not identified any site suitable for a transit site and therefore planning a transit site within a strategic site or urban extension would be a sensible approach to deliver a site. The location of a transit site should be on a main road, with good highway access and not located adjacent to or opposite existing residential properties.

Cross Boundary Working

- 5.8.7 The needs of Gypsies, Travellers and Travelling Showpeople do not stop at local authority boundaries and the potential for the delivery of all types of sites should be explored across these boundaries through the Duty to Cooperate, where appropriate. This is particularly pertinent for adjacent authorities that are also constrained by Green Belt.

- 5.8.8 The Council has a duty to co-operate with adjacent authorities. If the Council have explored all potential strategic sites / urban extensions and found that a transit site is not deliverable, then PBA would encourage the Council to work with neighbouring local authorities to potentially co-operate on the provision of a transit site. As stated above, however, police powers to move unauthorised encampments to transit sites stop at the Council boundary and therefore the Council would need to invite the police in any discussions.
- 5.8.9 The timing of evidence review is the key consideration for cross boundary working and the production of site assessments to identify specific sites is crucial. If required, Luton Council should liaise with adjacent authorities, especially those that have undertaken site work to establish if there are site opportunities that could meet the needs of the travelling community across boundaries. The lack of available opportunities to provide Gypsy and Traveller and Travelling Showpeople's accommodation in Luton in areas beyond (and within) the Green Belt is a material consideration in this respect.
- 5.8.10 The duty to co-operate is not a duty to accept, so the Council will have to be satisfied that adjacent authorities have undertaken robust assessments of sites to ensure they are not unnecessarily aiding any local authority to avoid providing sites within its own area. Crucially, the very definition of the travelling community, would suggest that this planning use is very cross boundary in nature and PBA would encourage all local authorities to resist the political sensitivities that can prevent the provision of suitable sites.
- 5.8.11 The Council are already working in partnership with neighbouring authorities and looking to undertake a Growth Strategy Options Study. It is recommended that this work includes identifying a location for a transit Gypsy and Traveller site to deliver the need of 10 pitches for Luton. The police should be invited to inform these discussions, to ensure that sites are located in the right place and that police powers can be used across local authority boundaries.

5.9 Delivery and Distribution of Sites

- 5.9.1 PBA consider that the distribution and delivery of provision across the local authority area is important and therefore the selection of site options by the Council should also be guided by the following principles:
- Fit with needs: e.g. location of current needs, existing provision and needs of different travelling communities; and
 - How potential sites relate to spatial strategies: e.g. accessibility to key services.
- 5.9.2 The fit with needs is an important consideration and, unlike the housing market, the small scale of need and supply (compared to housing) can in some instances require the consideration of the needs of specific families (from specific sites) and the appropriate form and location of provision to meet those needs. PBA are aware of local authorities where specific needs remain unmet, whilst sites remain vacant because the sites provided are inappropriate to meet specific needs. PBA recommend that the provision of pitches for Gypsies and Travellers sites should be managed to ensure a good fit with identified need and enable delivery. This is particularly relevant to providing extra pitches at LUT012.
- 5.9.3 The Borough is very urban and compared to rural districts, Luton local authority area is very accessible. It could be said that any potential Gypsy and Traveller and Travelling Showpeople site is within a sustainable location. Therefore poor accessibility should not be an absolute constraint for any of the identified potential sites.

5.10 Criteria Policy

- 5.10.1 To potentially meet any need later in the plan period (e.g. from 2025 onwards) and to provide a base for considering all planning applications, the Local Plan needs to include a criteria policy. Draft Policy LP20 of the Draft Local Plan (June 2014) includes a good criteria policy for assessing planning applications.
- 5.10.2 Given the extent of the urban area and Green Belt in Luton it is recommended that the Council identifies sufficient sites to meet defined needs over the whole plan period to 2031 rather than relying on the criteria policy to meet needs between 2020-2031. Once adopted the urban area and defined Green Belt will continue to be a significant constraint to planning applications for Gypsy, Traveller and Travelling Showpeople use on sites that have not been identified and allocated in the Local Plan.
- 5.10.3 If the Council were to identify and allocate only a five year supply; that is the minimum national policy requirement, they would restrict the remaining provision for plan period to sites within the urban area or beyond the defined Green Belt. The risk with this strategy is that unless sites beyond the Green Belt come forward or are identified by the Council in future evidence reviews on this issue then, the Council will be unable to meet requirements to provide sites in the future and could potentially be in a weaker position to deal with unauthorised sites.
- 5.10.4 The National Planning Policy Framework is clear that when defining Green Belt boundaries local authorities should “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period” (NPPF para 84). The NPPF also considers development for Gypsy, Traveller and Travelling Showpeople use in the Green Belt as inappropriate development, which would inhibit sites coming forward by the appeal process. The Council should therefore consider the allocation of sites and provision within strategic sites within the Green Belt in the Local Plan to meet the needs over the whole plan period 2011-2031. This would ensure that:
- All the defined needs are addressed in the Local Plan;
 - The travelling and settled communities would have certainty on the location of future sites;
 - The Council would be in a stronger position to deal with unauthorised sites and encampments;
 - Provision would have a better fit with the needs and current provision, which is generally located within the Green Belt; and
 - Provision would have a better fit with the Council’s spatial strategy which seeks to direct development towards sustainable sites with good access to main towns and key services.
- 5.10.5 PBA have amended the Draft Policy LP20 to reflect the findings of this report, to include:
- Targets;
 - Safeguarding of existing sites for Gypsy and Traveller and Travelling Showpeople uses;
 - Allocate potential sites for Gypsy and Traveller use; and
 - Criteria for assessing all Gypsy and Traveller and Travelling Showpeople planning applications.
- 5.10.6 The suggested policy criteria can be amended to reflect the sites chosen by the Council.

5.10.7 PBA would also recommend that the Council include a requirement for Gypsy and Traveller transit provision within a strategic site. This could be included within the specific policy for a strategic allocated site.

Revised Policy LP20 'Gypsies, Travellers and Travelling Showpeople Sites'

The existing Gypsy and Traveller site at St Thomas's Road, and Traveller Showpeople sites at 14 Wigmore Lane and 77 Wigmore Lane, are safeguarded for those purposes (as identified on the policies map).

Site name	Settlement	Existing Provision	Use (Gypsy and Traveller or Travelling Showpeople)
St Thomas's Road	Luton	20 pitches	Gypsy and Traveller
14 Wigmore Lane	Luton	6 caravans	Traveller Showpeople
77 Wigmore Lane	Luton	Whole site	Traveller Showpeople

To meet the identified need, as identified in the GTAA (2015), of 14 pitches for residential Gypsies and Travellers use, the following sites will be allocated:

Outside of the Green Belt

Site name	Settlement	Provision (no. of pitches)	Use (Gypsy and Traveller or Travelling Showpeople)	Timescale
Plot 1, Chaul End Lane	Luton	3	Gypsy and Traveller	2021-2030

Within the Green Belt

Site name	Settlement	Provision (no. of pitches)	Use (Gypsy and Traveller or Travelling Showpeople)	Timescale
Extension to St Thomas's Road	Luton	12	Gypsy and Traveller	2015-2020

Planning permission will be granted for permanent or transit Gypsy/ Traveller provision and Travelling Showpeople yards where the following criteria can be met:

- i. The site has reasonable access to shops, schools and other facilities; and
- ii. The site has adequate road access and is well related to the primary road network; and
- iii. Hardstanding and basic facilities, including electricity, water supplies, sewage disposal and waste collection, are provided on site;
- iv. There would be no unacceptable effect on the environment; and
- v. The site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplain.
- vi. In the case of Travelling Showpeople sites, the site includes sufficient space for storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers.

Any development granted under this policy will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.

[The Council could insert policy criterion linking to the strategic sites policies to deliver a transit site for 10 pitches]

5.11 Funding

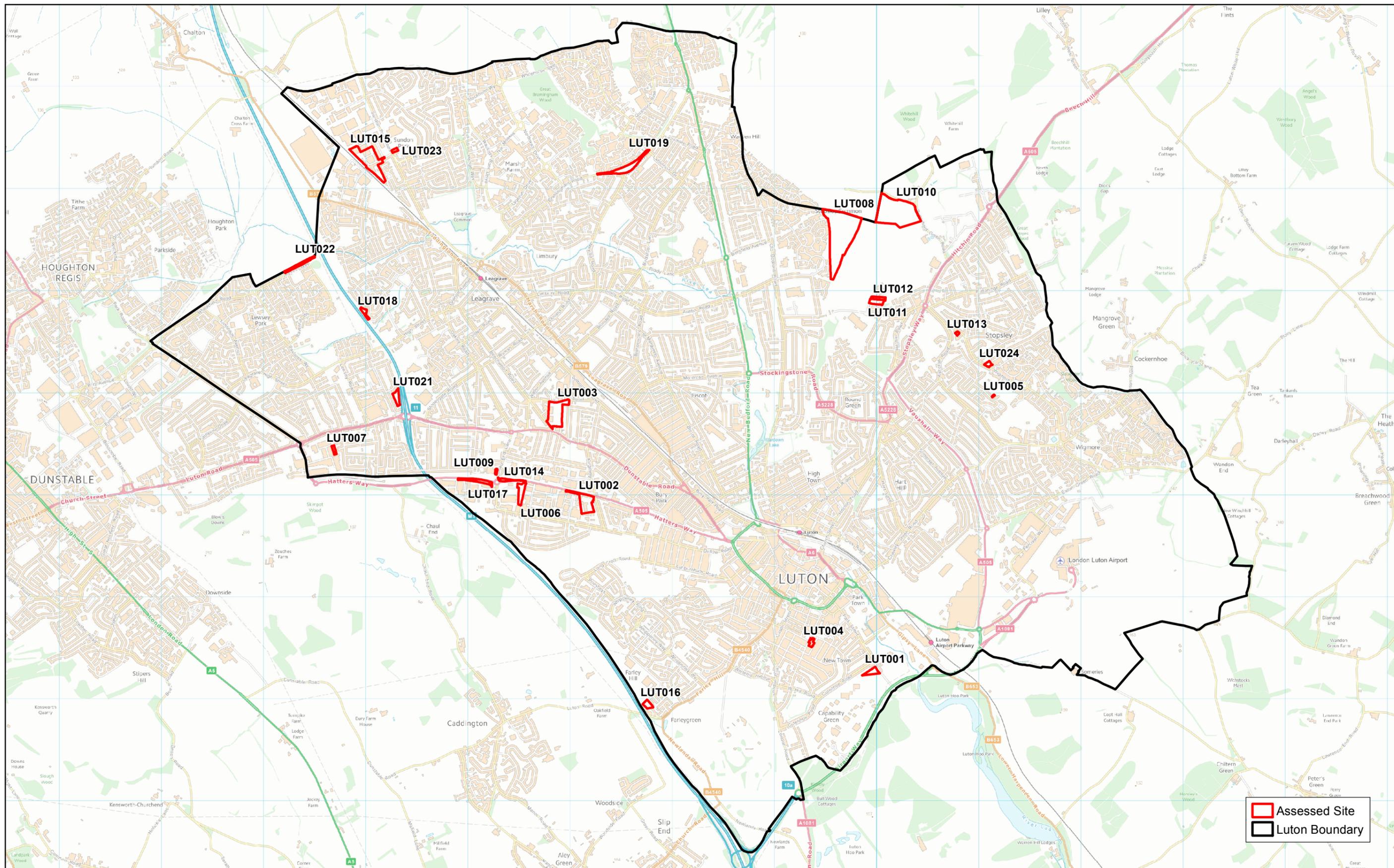
- 5.11.1 The Government has identified that it is focusing on incentivising councils to deliver new housing, including traveller sites. There are two potential sources of funding for local authorities:
- 5.11.2 Firstly, the New Homes Bonus scheme which operates in the same way for traveller sites as for other forms of housing. Namely, for every new pitch, a local planning authority will get six years of matched Council Tax funding, with an extra supplement for affordable pitches (such as sites owned or managed by local authorities and Registered Providers).
- 5.11.3 Secondly, the Homes and Communities Agency (HCA) has allocated £1.7bn, as part of its National Affordable Housing Programme for 2015-18, to fund the provision of affordable housing, including traveller sites. The Homes and Communities Agency has launched its prospectus inviting housing associations, councils, developers and others to bid for a share of grant funding for delivery of new affordable housing outside London. Bids will only be accepted for the provision of new traveller pitches and as with other types of accommodation, the Government does not expect to receive bids for schemes on Green Belt land or other land with special environmental protections.
- 5.11.4 A proportion of the £1.7bn funding will be retained for future bids through ongoing Market Engagement. This will allow organisations to take the longer timeframes they need to submit funding bids where schemes had not been fully worked up by 30 April 2014 when the formal bid round closed. The HCA website confirms that bidding for further allocations will reopen for continuous market engagement in due course. The HCA approach will encourage bidders to bring forward a higher proportion of firm and realistically deliverable schemes at the outset as it will allow them the flexibility to respond to development opportunities as these arise.

5.12 Delivery and Management

- 5.12.1 There is one affordable public Gypsy and Traveller site in Luton and it is currently full. There is an immediate and future need for affordable pitches within the Borough.
- 5.12.2 The existing site could be extended and managed by the same organisation. However, Registered Providers could be best placed to help deliver and manage public sites, working in partnership with the local authority. PBA are unaware of any Registered Providers managing any sites in the local area. It is recommended that the Council discuss the potential delivery and/or management of Gypsy, Traveller and Travelling Showpeople Sites with Registered Providers, to determine if this is an option, if required.
- 5.12.3 There are also emerging examples within the country of local planning authorities planning for the future provision of sites for travelling communities by allocating urban extension sites for housing and traveller pitches, requiring developers to provide serviced pitches/plots for private sale to Gypsies, Travellers or Travelling Showpeople. Where there is a demonstrable need for provision, some local planning authorities are identifying a need for developers to provide pitches/plots or commuted sums as part of the overall benefits package required for new development sites. PBA would recommend that sites are provided within strategic sites, rather than as a commuted sum, to ensure that sites are delivered within the local authority area. PBA have worked with Mid Sussex Council, who have specifically set out this requirement in adopted policy for a future urban extension.

- 5.12.4 There are also innovative delivery models being developed in other parts of the country, such as by Elim Housing in the West of England, which could provide for the funding of initial sites to be recycled to provide for further sites, in the same way as affordable housing has been delivered by housing bodies for some years. For example, the Council could consider using New Homes Bonus or other monies to buy a site or identify their own public assets and then make them available to organised Gypsy and Traveller groups on a non-profit making basis for them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to be recycled to provide further sites.
- 5.12.5 The Council should investigate these sources of funding and delivery options further, in partnership with the Registered Providers and other delivery partners.

Appendix A Sites Location Map



Date	29/07/2015
Scale	1:34,312 @ A3
Drawn By	CM
Checked By	SJ
Revision Number	01

Client
Luton Borough Council

Appendix B Desktop Assessment Matrix - Stage 1

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.
Green Belt and Landscape	Green Belt	n/a	The site is within the Green Belt or sensitive landscape and could therefore have a negative impact requiring further investigation.	The site is not located in the Green Belt or 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.
Historic Environment	Sites of Archaeological Importance Historic Park and Garden Conservation Area Listed building	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.	The site could result in harm to elements which contribute to the significance of a designated heritage asset, which require further investigation.	The site is unlikely to harm the significance of any designated heritage asset or its setting.

Availability	Promoted sites, public land ownership, etc.	The owner has confirmed that the site is not available, nor is it likely to be available in the future.	Site availability is unknown and requires further investigation. Public owned sites deemed potentially available for Gypsy and Traveller use unless informed otherwise.	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.
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Appendix C Sites with No Potential at Stage 2

Site ref	Site name	Reason for rejection
LUT001	Cutenhoe Community Learning Park	The Council have confirmed that the land will be required in association with a potential secondary school close by, for use as playing fields. This land is therefore not available for Gypsy and Traveller development.
LUT002	Former Jewson site	The Council confirm that the landowners are not making the site available for Gypsy and Traveller and/or Travelling Showpeople uses. The site is a builders merchants yard and premises surrounded by employment and residential properties, accessed off Hatters Way. Policy EM1, in the Local Plan (2001-2011), allocates the site as a key employment site, which restricts development on this site to employment uses only. Therefore the site can not be developed for Gypsy and Traveller uses. Draft Local Plan (2014) allocates the site as a Key Employment Area A.
LUT003	Land at Caleb Close	The site is a housing allocation in the Local Plan and currently being promoted to the Council for this use. The site has value for a more profitable use and likely to be developed for housing, therefore the site is not available for Gypsy and Traveller or Travelling Showpeople development.
LUT004	Land at Telmere Industrial Estate	The Council have confirmed that the site is not available for Gypsy and Traveller use, due to its current employment use.
LUT005	Mangrove Road garages	The site is not suitable for Gypsy and Traveller or Travelling Showpeople development, as the site is too small and would impact on the residential amenity of adjacent residential properties.
LUT007	Land off Hayhurst Road	The site is not suitable for Gypsy and Traveller or Travelling Showpeople uses, as the site is currently in use as open space and play area, and it has no suitable highway access. The Council have also confirmed that the site is not available for Gypsy and Traveller use.
LUT008	Land east of Bushmead	<p>The site is not suitable for Gypsy and Traveller and Travelling Showpeople uses, due to unacceptable impacts on landscape character and Green Belt purposes.</p> <p>The site comprises two distinct areas.</p> <p>Landscape assessment: Much of the area is considered to be suitable for designation as an Area of Local Landscape Value or Area of Great Landscape Value (Proposed Local Landscape Designations for Luton; June 2014). Both parts of the site are considered to be unsuitable locations for Gypsy and Traveller development. Any development would be likely to have an unacceptable direct or indirect effect on the immediate setting of the adjoining Chilterns AONB and the distinctive escarpment feature; it would also be overlooked from the top of the escarpment within the AONB and incongruous within the context of the suburban development which forms a defined and homogenous character on this edge of the town – an area considered to have particular landscape value.</p> <p>Green Belt assessment: All but a western corridor of land lies within Green Belt, within an area defined as Site 2 in the Luton Green Belt Study (Draft; May 2014) and assessed as making a High/Medium level of contribution to Green Belt purposes. The non-designated land reflects the protected route of the Luton East Circular Road. The Study recommends that the Green Belt boundary is amended to follow the built up edge, even if the road remains a future ambition. Any development in this area would conflict with aim of the designation by reducing physical and perceived openness of the Green Belt, in an area where the existing urban edge is reasonably well defined. As such development would appear and be perceived as a clear encroachment into undeveloped countryside (conflicting with Green Belt purpose 3) that possesses a distinct character, and would adversely affect its openness.</p>

Site ref	Site name	Reason for rejection
LUT010	Land at Manor Farm	<p>The Council confirm that the landowners are not making the site available for Gypsy and Traveller and/or Travelling Showpeople uses. The site is not suitable for Gypsy and Traveller and Travelling Showpeople uses, due to unacceptable impacts on landscape character and Green Belt purposes.</p> <p>Landscape assessment: It would lead to an isolated form of development in countryside that has been identified as having local landscape value, and is vulnerable to erosion, particularly given its close proximity to the edge of the town (the nearby Sports Village is visible across the eastern field), and the potential for significant effects on visual amenity (views from the public footpath). Development in the western field, which would have to be accessed through the eastern field, would be particularly visible and out of place; it would also adversely affect the immediate setting of the AONB. The site is therefore considered to be an unsuitable location for development.</p> <p>Green Belt assessment: The site is located in Green Belt which extends across the 'wedge' of undeveloped land on the northern side of the town, falling within Site 2 defined in the Luton Green Belt Study (Draft; May 2014) which is assessed as making a High/Medium level of contribution to Green Belt purposes. Development would reduce openness in an area that has a defined countryside character leading to encroachment (contrary to purpose 3); it is also likely to lead to a reduction in separation between the edge of the built up area and the defined cluster of houses at Butterfield Green, the sense of which is all the more apparent because of the intervisibility between the two making it an area that is particularly vulnerable to incremental change.</p>
LUT011	Existing G&T site	<p>This is an existing public Gypsy and Traveller site which is authorised for 20 pitches and needs to be safeguarded within the Local Plan. There is no room to intensify the site for more pitches. Extensions to the site have been considered by the Council previously, and this has been considered further within this study (see site assessment LUT012).</p>
LUT013	14 Wigmore Lane	<p>This is an existing Travelling Showpeople site which needs to be safeguarded within the Local Plan. There is no room to intensify or expand the existing site for further plots. The site had temporary planning permission (00/01276/REN) for 6 residential caravans, on the 11 Jan 2001 for 5 years, which expired in Jan 2006. The site could be classified as a tolerated site from January 2016, (since the last temporary permission expired) and it is recommended that the site be subject to a certificate of lawful use.</p>
LUT014	Land at Hatters Way	<p>This is a steep strip of land between two roads comprising a tree belt. The site is not suitable for Gypsy and Traveller or Travelling Showpeople development due to the topography of the land and unacceptable highway access off Hatters Way. The Council also confirm that development in this location may affect the scope for any highway improvement at the Hatters Way junction.</p>
LUT015	Land off Park Avenue	<p>The site is an employment area which has a couple of unused areas, but the majority of the site is in active employment use. Policy EM1, in the Local Plan (2001-2011), allocates the site as a key employment site, which restricts development on this site to employment uses only. Therefore the site can not be developed for Gypsy and Traveller uses. Draft Local Plan (2014) allocates the site as a Key Employment Area B. Even if the unused parts of the site were to be released for non-employment uses, this site would not be considered suitable for Gypsy and Traveller or residential Travelling Showpeople development, due to impacts on residential amenity from the existing adjacent employment uses and railway. The site could be suitable for Travelling Showpeople equipment only, if there was an identified need in the future.</p>
LUT016	Land off Tinsley Close	<p>The site comprises a broadly rectangular area of Amenity Greenspace located in a slightly elevated position in front of houses facing on to Tinsley Close which forms the eastern boundary; a row of semi mature trees define this edge. To the south and west lies a large new development of apartments which separate the site from the M1 to the west and Luton Road to the south. Any Gypsy and Traveller or Travelling Showpeople development in this location would be out of keeping with the established character of the adjoining residential area. Some trees would need to be removed to provide access. Any development is likely to remove the amenity value of the space. The site is not considered to be a suitable location for development.</p>

Site ref	Site name	Reason for rejection
LUT017	Land off Hatters Way/Cosgrove Wa	This is a tree belt within amenity land, situated between a main road and employment area, and therefore not suitable for Gypsy and Traveller or Travelling Showpeople development. The Council also confirm that development in this location may affect the scope for any highway improvement at the Hatters Way junction.
LUT018	Land off Bank Close	The site lies between the rear of houses facing Hockwell Ring and Bank Close, with the noise barrier and wooded cutting slopes of the M1 forming the western boundary. It appears to form an area of unmanaged land with access off a gated track from Bank Close at the southern end. The site is unsuitable for Gypsy and Traveller or Travelling Showpeople uses as it is immediately adjacent existing residential properties and would potentially impact on existing residential amenity; it has unsuitable highway access off Bank Close which is a narrow residential road; and it is located adjacent the motorway which would present noise pollution.
LUT019	Land off Bramingham Way	This is an area of amenity land within a residential area and overlooked by existing residential properties. The site is therefore not suitable for Gypsy and Traveller or Travelling Showpeople development.
LUT021	Land off Faringdon Road	This is an area of Amenity Greenspace, as identified in the plan in Appendix 2 of the Luton Local Landscape Designations Report. The site is unsuitable for Gypsy and Traveller or Travelling Showpeople development, as it does not have appropriate vehicle access; the site is amenity space; it is immediately adjacent existing residential properties and would potentially impact on existing residential amenity; and it is located adjacent the motorway which would present noise pollution.
LUT022	Land off Kestral Way	The site comprises a long narrow linear strip of land located to the rear of the northern verge and footpath on the northern side of Kestrel Way which is occupied by a belt of semi mature woodland. The land within the Green Belt beyond is featureless and open with views of many pylons and beyond the M1 to slightly higher land in the medium distance. The developing woodland forms a locally distinctive feature and provides visual containment along the urban edge in views from the countryside within Green Belt beyond; it also helps to provide a robust feature on the edge of the Green Belt. Any development within this site, even if practical, would remove woodland and would be highly visible from the countryside to the north. The site is not considered to be a suitable location for development.
LUT023	210 Sundon Park Road	The site is potentially suitable for Gypsy and Traveller or Travelling Showpeople (residential only) development for up to 10 pitches. The site is not suitable for transit or Travelling Showpeople (equipment) uses. However, the Council have confirmed that the site is not available, and are currently midway through on selling the site. If the sale of the site was not to go forward, then the Council could consider the site for residential Travelling Showpeople or Gypsy and Traveller uses.
LUT024	77 Wigmore Lane	This is an existing Travelling Showpeople site which needs to be safeguarded within the Local Plan. There is no room to intensify or expand the existing site for further plots.

Appendix D Sites with Potential at Stage 2

LUT009	Plot 1 Chaul End Lane	Luton	Source:
		0.09 ha	Call for sites <input type="checkbox"/>
Description of site			Current unauthorised <input type="checkbox"/>
<p>The site is surplus highway land, just off Chaul End Lane, which is slightly elevated from the site. It comprises a small area of flat hardstanding, located adjacent a redundant employment site to the west and residential properties to the north. The main road into Luton, Hatters Way, is to the south of the site.</p>			Current authorised <input type="checkbox"/>
			Privately promoted <input type="checkbox"/>
			Public owned land <input checked="" type="checkbox"/>
			Strategic site <input type="checkbox"/>
			Site survey <input type="checkbox"/>
			SHLAA <input type="checkbox"/>
Planning history			Accessibility to services:
<p>There is no known relevant planning history.</p>			GP surgery: km
			Primary school: km
			Secondary school: km
			Bus stop: km
			Train station: km
			Employment: km
Availability			Shop: km
<p>This is land acquired by the Council during the construction of the Luton Dunstable Busway. The site is owned by Luton Borough Council and therefore deemed potentially available for Gypsy and Traveller use.</p> <p>Highway officers have stated that the site could be required for potential highway improvements at the Hatters Way junction, and this requires further investigation.</p>			
Suitability:			
Policy constraints			
<p>The site is within the development boundary of Luton.</p>			
Physical constraints			
<p>Highway comments - Access off Chaul End Lane of concern given the existing traffic pressures. Also may affect the scope for any highway improvement at the Hatters Way junction.</p> <p>The site would be too small for a public transit site, which ideally would have a minimum of 10 pitches, to justify the management and viability of a transit site.</p>			
Landscape impacts			
<p>Not applicable, as the site is within the urban area.</p>			

Green belt review

The site is not within the Green Belt.

Other potential impacts

There are potential contamination issues from the previous highway use; and potential impacts from air/noise pollution from adjacent roads which may restrict the site being used for Gypsy and Traveller use. This requires further investigation.

Achievability:

The site is potentially required for highway improvements at the Hatters Way junction, therefore the site is potentially not deliverable. However, the site is developable for Gypsy and Traveller use. Otherwise, there appear to be no reasons why the site could not be sold by the Council and developed by a Gypsy and Traveller family. The land is potentially available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion:

The site is just off Chaul End Lane which is slightly elevated from the site. Although further investigation would be required relating to potential contamination issues from the previous use and highway access. Potential impacts from air/noise pollution from adjacent roads may restrict the site being used for Gypsy and Traveller use, but this requires further investigation. Further investigation would also be required to whether the site is required for any potential highway improvements at the Hatters Way junction. The site would be too small for a public transit site, which ideally would have a minimum of 10 pitches, to justify the management and viability of a transit site. Subject to

Delivery:

Potential yield:

2015 - 2019:	0
2020 - 2024:	3
2025 - 2029:	0
2030 - 2032:	0

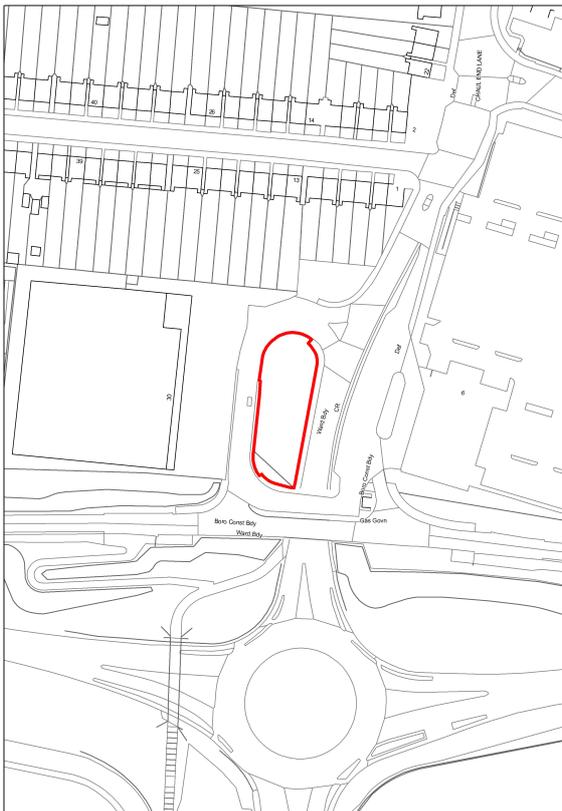
Potential occupants:

Type of use:

Residential

Delivery model:

- Model 1 - New public site for development
- Model 2 - Potential for new private site for development
- Model 3 - New site to be developed as part of an urban extension



LUT012	Luton Regional Sports Centre	Luton	Source:
St Thomas's Road		0.35 ha	Call for sites <input type="checkbox"/>
Description of site			Current unauthorised <input type="checkbox"/>
The site lies within open space directly north of an existing public Gypsy and Traveller site. A former Regional Sports Centre (mostly demolished with one remaining building boarded up) and associated car park, lies to the north; the access to the car park to the east passes around the southern side of this area. The sports centre has been replaced by Luton Sports Village to the east and we understand that this area is to be reinstated to open space use (although the future of the remaining building is not known).			Current authorised <input type="checkbox"/>
			Privately promoted <input type="checkbox"/>
			Public owned land <input checked="" type="checkbox"/>
			Strategic site <input type="checkbox"/>
			Site survey <input type="checkbox"/>
SHLAA <input type="checkbox"/>			
Planning history			Accessibility to services:
There is no relevant planning history. The site was previously considered by Luton Borough Council for an extension to the existing adjacent Gypsy and Traveller site (LUT011). SHLAA identifies the site (462) unsuitable for residential development. Green Belt (ENV3) QEII playing field/parkland.			GP surgery: km
			Primary school: km
			Secondary school: km
			Bus stop: km
			Train station: km
			Employment: km
Availability			Shop: km
The site is owned by Luton Borough Council and is being promoted for Gypsy and Traveller development.			
Suitability:			
Policy constraints			
The site is within the Green Belt. Local Plan (2001-2011) policies ENV3 Green Belt; LC1 Protection and Preservation of Green Spaces. Draft Local Plan policies Green Belt, District park and QEII playing field.			
Physical constraints			
Highway comments - Access off St Thomas's Road probably ok but may need some mitigation (e.g. waiting restrictions) in view of the pressures from the new school.			
Landscape impacts			
The area between the existing urban boundary and the former sports centre was not identified as being suitable for designation as part of the Stopsley Common Area of Local Landscape Value or Area of Great Landscape Value (Proposed Local Landscape Designations for Luton; June 2014). The potential Gypsy and Traveller site, is adjacent an existing Gypsy and Traveller site, and occupies land containing an informal mounded area, supporting a number of maturing trees, and more level grassland between the mound and the car park access road. The mound is offset a short distance north of the boundary of the existing site and provides a high level of visual containment of the existing site from the open space beyond. There is potential to accommodate a northward extension of the existing site but this would entail recreating the mound further north and replanting to create a similar or improved level of containment. The landscape/visual effects of so doing would be limited although it would involve a small loss of open space.			

Green belt review

The site is located in Green Belt which extends across the 'wedge' of undeveloped land on the northern side of the town, falling within Site 2 defined in the Luton Green Belt Study (Draft; May 2014) which is assessed as making a High/Medium level of contribution to Green Belt purposes. Extension of the site into the designated area would be contrary to the overall aim of maintaining the openness of the Green Belt, although development of the site would not lead or contribute to the merger of towns (Green Belt purpose 2) or adversely affect the setting/special character of historic towns (purpose 4). Due to its modest nature and the potential for successful mitigation it is unlikely to be perceived as 'unrestricted sprawl' (to which purpose 1 refers). Development would constitute an encroachment into countryside (purpose 3), although the site does not have the character of countryside per se being managed as open space. It would be possible to redefine the Green Belt boundary in a similar form to provide a well-defined and enduring boundary to the Green Belt.

Other potential impacts

The site is part of open space and protected by existing policy LC1 Protection and Preservation of Green Spaces, in the Local Plan (2001-2011). Policy LC1 criteria (c) sets out when development can be permitted in these green spaces. Development in this location could be permitted as a Gypsy and Traveller development in this location would meet the requirements set out in criterion c.

The existing site is over the number of pitches normally recommended as appropriate for a Gypsy and Traveller site, however, this is an established and well managed site, and therefore could be extended for further pitches. This should be subject to continued good management of the site.

Achievability:

There appear to be no reasons why the site could not be developed by public bodies, to extend the adjacent public Gypsy and Traveller site. The land is available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the public body to finance the development, either through grant monies or utilising existing assets.

Conclusion:

The site is owned by the Council and available for Gypsy and Traveller use. It is suitable for an extension to the existing public Gypsy and Traveller site. The site meets policy LC1 criterion c and would not have a significant impact on Green Belt purposes and landscape character. Therefore the site is suitable for Gypsy and Traveller development. Any proposal would need to be subject to mitigations measures put in place relating to landscaping, highway access and suitable management measures.

Delivery:

Potential yield:

2015 - 2019:	12
2020 - 2024:	0
2025 - 2029:	0
2030 - 2032:	0

Potential occupants:

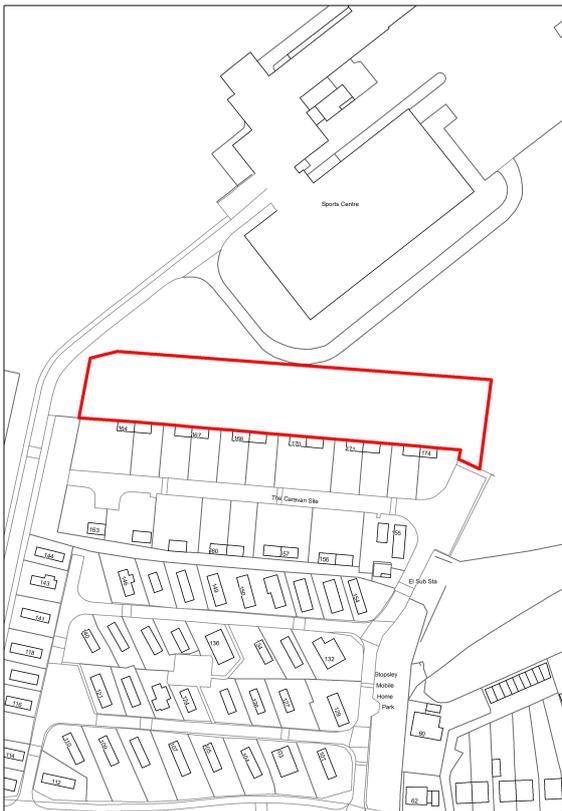
Gypsies and travellers

Type of use:

Residential

Delivery model:

Model 1 - New public site for development	<input checked="" type="checkbox"/>
Model 2 - Potential for new private site for development	<input type="checkbox"/>
Model 3 - New site to be developed as part of an urban extension	<input type="checkbox"/>



Appendix E Design Templates

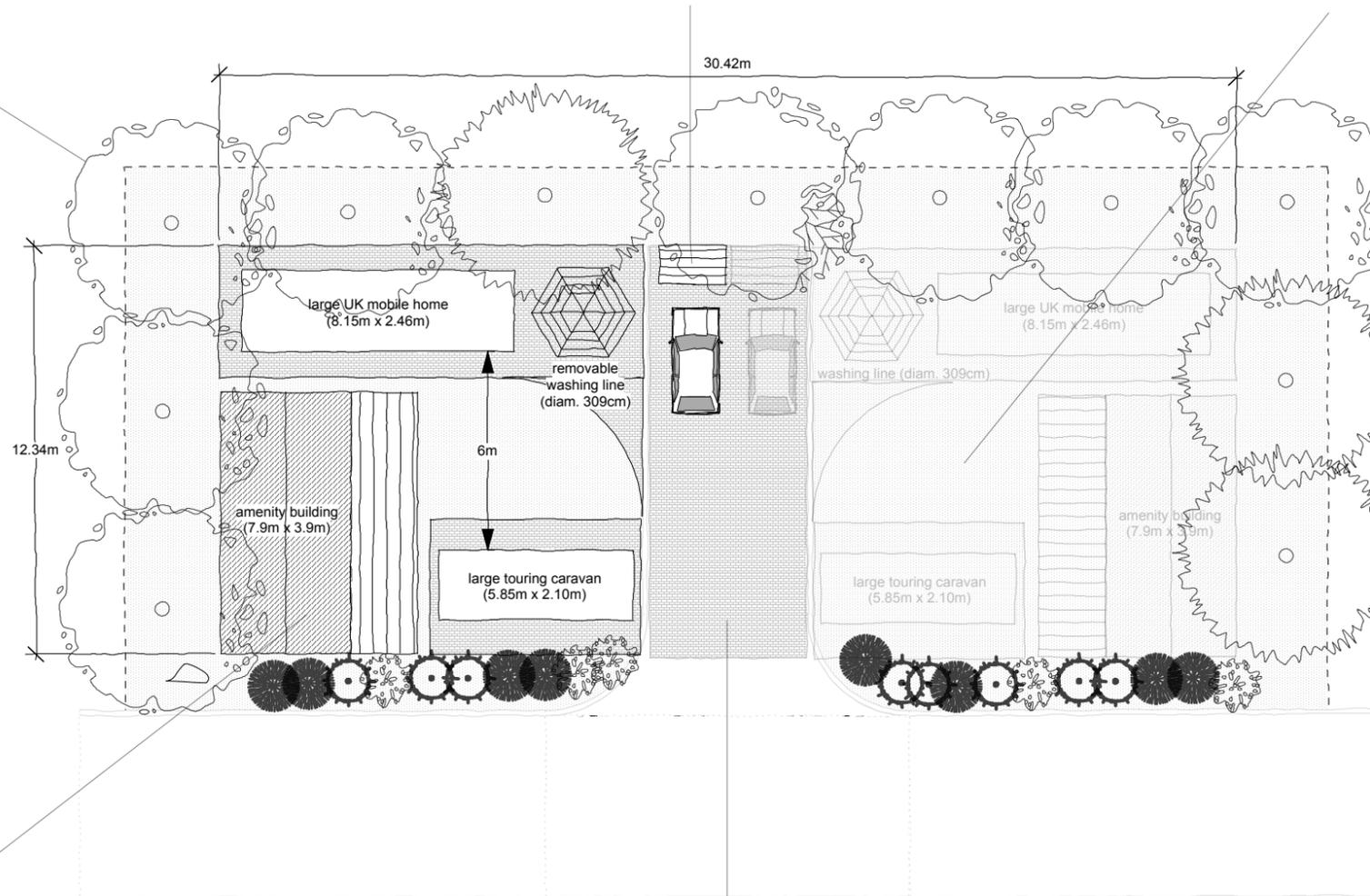
EXAMPLE OF 1-2 PITCH PRIVATE SITE (0.14 acres)

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.

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.

Ideally sites would provide space play and/or food growing. In this instance this area of land could also accommodate a further pitch if necessary, though that would of course restrict the play and food growing to the small open space on each pitch.

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.



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

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 (on hard standing if regularly moved) 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.

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		1-2 Pitch Site	
Project Manager Mark Russell		Project ID a483	
Drawn By Daniel Black		Scale 1:200 @ A3	
Reviewed By N/A		Sheet No.	
Date		_____ of _____ 1 of 1	
CAD File Name a483/001/Rev1			

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.

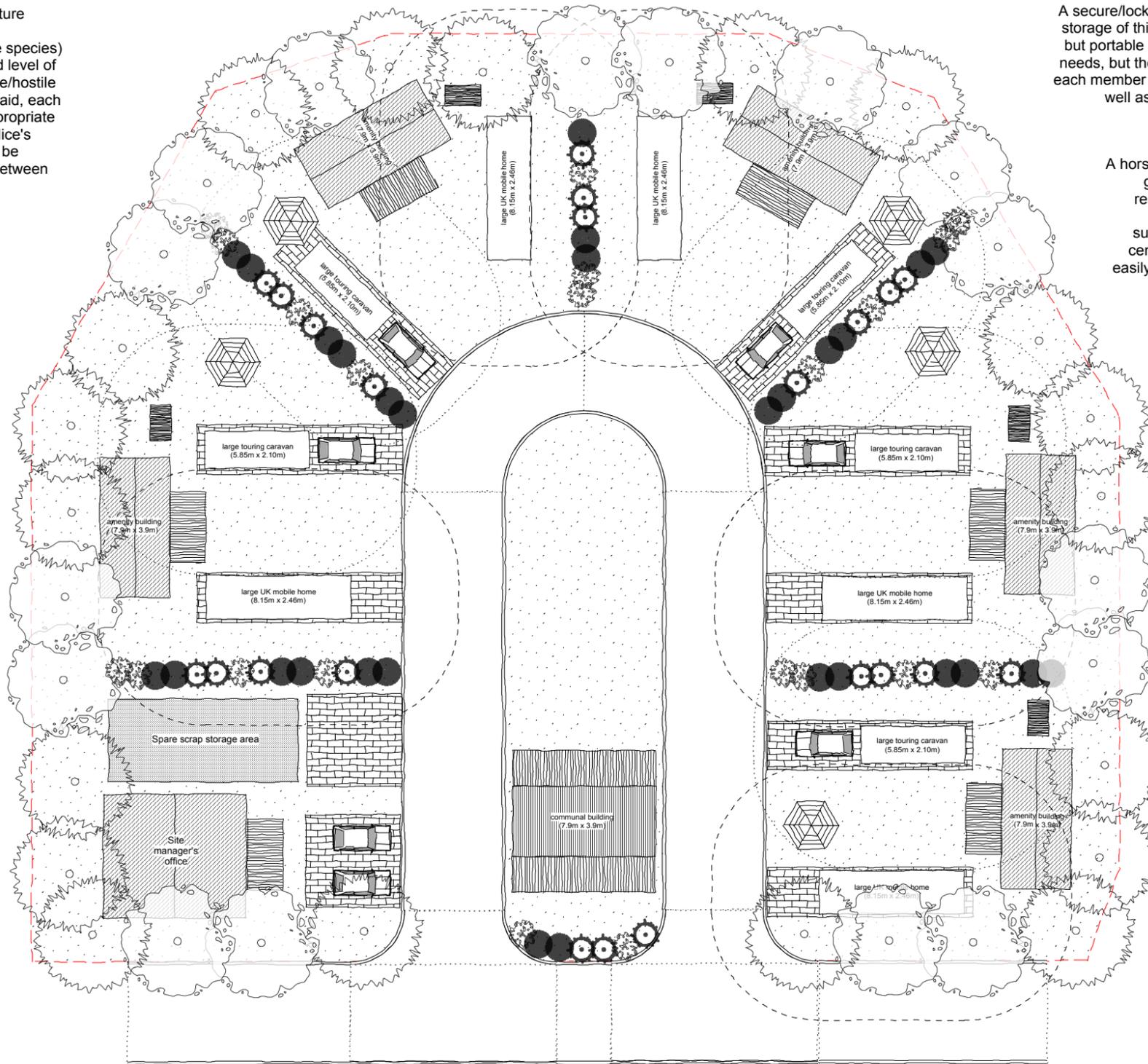
A secure/lockable shed should be provided for storage of things like bicycles and other large, but portable equipment. Size is dependent on needs, but there should be sufficient space for each member of the family to have a bicycle as well as any other gardening equipment.

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 _____	
CAD File Name		6	
a483/002/Rev1			