

LOCAL PLANNING AND ENVIRONMENT ADVISORY COMMITTEE 25 March 2014 at 7.00 pm

Further to the despatch of agenda and papers for the above meeting, please find the following background document(s):

6. Gypsies and Traveller Plan - Site Options consultation

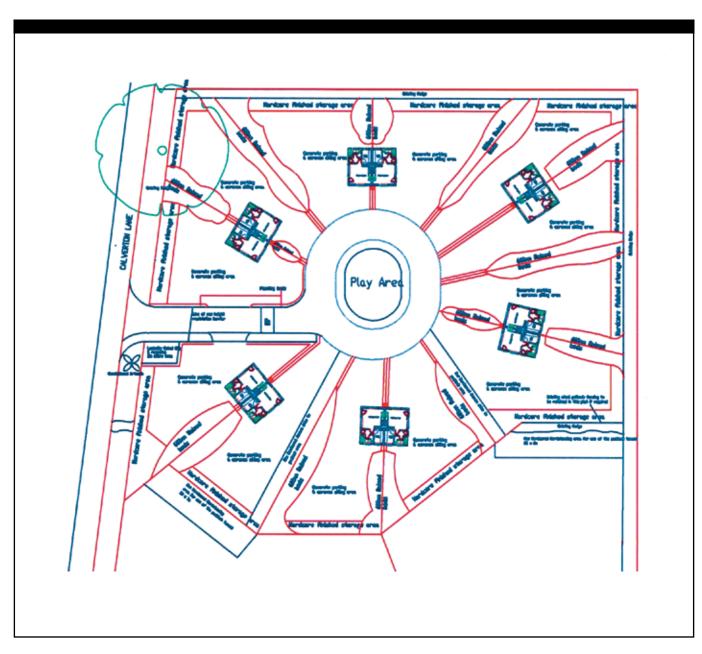
(Pages 1 - 246)

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Designing Gypsy and Traveller Sites **Good Practice Guide**







Designing Gypsy and Traveller Sites **Good Practice Guide**

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Chapter 1

Introduction

- 1.1 The Government believes that everyone should have the opportunity of a decent home. Decent homes are a key element of any thriving, sustainable community. This is true for the settled and Gypsy and Traveller communities alike.
- 1.2 Planning Policy Statement 3: Housing (PPS3) sets out the Government's national planning policy framework for delivering its housing objectives. It applies equally to site accommodation provided for the Gypsy and Traveller communities.
- 1.3 Paragraphs 12-19 of PPS3 stress the importance of good design in developing high quality new housing and identify the key issues which must be considered to achieve this. Paragraphs 20 to 24 identify the key characteristics of a mixed community and make it clear that this can only be secured by achieving a good mix of housing, including accommodation for Gypsies and Travellers.
- 1.4 The guidance contained in this document is intended to concentrate more closely on these issues, in the context of Gypsy and Traveller site provision, to familiarise developers with the key elements necessary to design a successful site and to identify good practice using case study examples to illustrate different approaches.
- 1.5 In particular, this guidance is intended to help:
 - Local authorities who wish to develop a new site, or refurbish the whole or part of a site
 - Registered social landlords who wish to develop or refurbish a site
 - Private developers or architects working with site developers
 - People who will be living on a site and are participating in its design.
- 1.6 It will be particularly relevant to local authorities and registered social landlords wishing to bid for Gypsy and Traveller Site Grant. In assessing applications for grant in future bidding rounds, we will consider whether the elements identified in this guidance as essential are met, and how the remainder of the guidance is addressed.

- 1.7 This guidance makes clear that there is no single, appropriate design for sites, any more than there is for general housing development. Early and regular consultation with prospective residents is a crucial element in getting the design right for any new site, taking into account the needs of residents and the physical characteristics of the site itself.
- 1.8 This guidance has been developed in consultation with members and representatives of the Gypsy and Traveller communities, together with those managing public sites. It draws attention to those elements which have been found to work best in developing sites which will be sustainable in the long term, and which meet residents' traditional and cultural needs.
- 1.9 Good practice in site design will evolve in the light of experience as it does for housing generally. As authorised site provision increases, new ideas, modern methods and innovations should arise. This document will be revised from time to time to reflect these. Updates will be provided on the Communities and Local Government website.

Context

- 1.10 There are currently around 300 socially rented Gypsy and Traveller sites in England. However, there is a national shortage of authorised sites, with around one in four Gypsy and Traveller households having nowhere to call home. The Government has established a new framework of housing and planning systems designed to increase site provision to meet the accommodation needs of Gypsies and Travellers, reducing the number of unauthorised sites and promoting good relations with the settled community.
- 1.11 In addressing this challenge it is important to ensure that these sites:
 - Are sustainable, safe and easy to manage and maintain
 - Are of a decent standard, equitable to that which would be expected for social housing in the settled community
 - Support harmonious relations between Gypsies and Travellers and the settled community.
- 1.12 It is recognised that it will not be possible to meet all aspects of this guidance in every respect on every site. Local authorities and registered social landlords will need to take decisions on design on a case by case basis, taking into account local circumstances such as the size, geographical and other characteristics of the site or prospective site and the particular needs of the prospective residents and their families.

1.13 In the case of small private site development there will be similarities but it should be recognised that those sites are designed to meet the individual and personal preferences of the owner and may contain elements which are not appropriate or popular for wider application in respect of social provision. It would not therefore be appropriate to use this good practice guidance in isolation to decide whether a private application for site development should or should not be given planning permission.

Scope

- 1.14 The guidance is primarily intended to cover social site provision for Gypsies and Irish Travellers and covers a range of sites including:
 - Permanent sites providing residents with a permanent home. The bidding guidance for Communities and Local Government's Gypsy and Traveller Site Grant explains that for permanent sites ownership should remain with the local authority or registered social landlord and continue in use as a Gypsy and Traveller site for at least ten years, although consideration will be given to sites of a shorter term nature where there is a sound business case that demonstrates value for money.
 - Transit sites permanent sites used to provide only temporary accommodation for their residents. Lengths of stay can vary but are usually set at between 28 days and three months, although practice on private transit sites tends to be more relaxed in respect of the amount of time people are permitted to stay. The requirements for transit sites reflect the fact that they are not intended for use as a permanent base for an individual household.
 - **Temporary stopping places** pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.
- 1.15 This guidance may not be appropriate for all New Traveller sites and early and regular consultation should be conducted with members of this community where they are prospective residents of a site, to ensure it contains the key elements which meet their particular needs.
- 1.16 Further material on the development of sites designed specifically for travelling showpeople will be produced at a later date.

How this guidance was developed

- 1.17 This guidance is based on work undertaken initially by consultants which considered:
 - Existing research on the design features that work effectively on Gypsy and Traveller sites
 - Views of residents drawn from visits to a range of sites
 - Consultation with organisations representing the views of Gypsies and Travellers
 - Interviews with site managers and developers from the social housing and private sectors
 - Interviews with professionals and organisations working with Gypsies and Travellers, including traveller education services, health advocates, planners, the police, fire and other emergency services.

and a consultation exercise on the outcome of that work with stakeholders.

- 1.18 It is intended to incorporate standards that are comparable to those required of publicly funded developments of housing for the rest of our society. The main source of guidance on this has been the Scheme Development Standards required of new social housing developments funded by the Housing Corporation. In translating the standards for social housing to Gypsy and Traveller sites we have had regard to:
 - The different demographic profile of Gypsy and Travellers
 - The cultural needs of Gypsies and Travellers
 - The intended use and longevity of the site (normally a minimum of ten years unless the land is only available for a shorter period
 - The need to make best use of land and other resources available to develop sites
 - The need for site design to facilitate economic and effective management of the site
 - The Model Standards for Park Homes, and in particular the standards to apply to sites accommodating dwellings made from combustible materials.
- 1.19 The case study below shows that an old site can be successfully refurbished to meet the types of modern day design standards included within this guidance.

Case Study 1

Star Hill, Hampshire

The Star Hill site in Hampshire is a long established county council run permanent site which was recently refurbished to bring it up to modern day standards.

Existing residents were extensively consulted about the refurbishment plans before commencement. Now, each of the 20 pitches can accommodate two trailers/caravans and has ample parking space. Every pitch has a brick built amenity building containing high standard facilities and incorporating good insulation and heating. Each one has a bath, shower, toilet, kitchen and airing cupboard. There is space and connections for washing machines and freezers.

Each pitch is demarcated by a 4ft wooden fence and has gated access. The fence height is increased to 6ft between amenity buildings to ensure privacy.

Chapter 2

Context

Addressing the shortage of sites

- 2.1 It is widely accepted that there is a national shortage of authorised sites for Gypsies and Travellers. This has led to an increasing incidence of both unauthorised encampments and unauthorised developments and has sometimes created tensions between Gypsies and Travellers and the settled community.
- 2.2 The Government has introduced a number of measures to address this.
- 2.3 The Housing Act 2004 introduced a new obligation on local housing authorities to assess the accommodation needs of Gypsies and Travellers in their areas, and to develop a strategy to address these needs.
- 2.4 Office of the Deputy Prime Minister Circular 01/2006¹ explains that Regional Planning Bodies must determine how many pitches are needed and, through the Regional Spatial Strategy, how many are needed in each local authority area. Local planning authorities must identify sites in Development Plan Documents and if they fail to do so they can be directed by the Secretary of State.
- 2.5 Communities and Local Government provides Gypsy and Traveller Site Grant for the provision of new sites, and the refurbishment of existing sites. The grant is available to local authorities and registered social landlords. Where potential developers have little experience in the provision of Gypsy and Traveller sites, they may wish to work with neighbouring local authorities or other RSLs that have greater experience in this area.

¹ Local authorities and Gypsies and Travellers – Guide to responsibilities and powers, ODPM

The need for site design guidance

2.6 The Select Committee for the Office of the Deputy Prime Minister: Housing, Planning, Local Government and the Regions Thirteenth Report² (October 2004) concluded that:

"The current guidelines relating to site design and standards urgently need updating in the light of modern space standards and services, health and safety provisions and requirements for catering for disability."

The Committee recommended that the guidance should cover residential ie permanent sites, transit sites and stopping places.

- 2.7 In October 2004, research showed that many existing local authority sites were of a poor standard. The estimate for maintenance and improvement of these sites to bring them up to standard and to maintain them was £16.7m over the next five years. Research has also showed that skimping on initial site design and construction often means more investment is needed later to rectify problems arising from this³.
- 2.8 The guidance issued by Government recognises the specific cultural and accommodation needs of Gypsies and Travellers, as well as the increasingly settled lifestyle of some Gypsy and Traveller households that facilitates, for example, access to education for families with children. This creates challenges for site design because of the need to incorporate features that not only facilitate continued periods of travelling but are also consistent with settled living. Many older sites were developed on an assumption that households would not live on them for long periods, and the facilities on those sites are increasingly out of keeping with accepted standards for family living.

² Paragraph 163

³ Niner, P (July 2003) The provision and condition of Local Authority Gypsy/Traveller sites in England, ODPM – summary of full report Local Authority Gypsy/Traveller sites in England

Chapter 3

Site location/selection – permanent sites

Location

- 3.1 Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any other form of housing, poorly located sites, with no easy access to major roads or public transport services, will have a detrimental effect on the ability of residents to:
 - Seek or retain employment
 - Attend school, further education or training
 - Obtain access to health services and shopping facilities.
- 3.2 Easy access to local services, and to social contact with other residents in the community, should help deal with the myths and stereotypes which can cause community tension and instead encourage a greater sense of community with shared interests.
- 3.3 It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places, as this will obviously have a detrimental effect on the general health and well-being of the residents and pose particular safety risks for young children. All prospective site locations should be considered carefully before any decision is taken to proceed, to ensure that the health and safety of prospective residents are not at risk.
- 3.4 Office of the Deputy Prime Minister (now Communities and Local Government) Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites provides advice on site location and selection. It identifies factors which are important for the sustainability of a site, for instance:
 - Means of access, availability of transport modes and distances from services
 - Promotion of integrated co-existence between the site and local community
 - Easy access to General Practitioner and other health services

- Near to a bus route, shops and schools
- Ground conditions and levels of land
- Not locating sites in areas of high flooding risk (for medium and low risk areas see paras 3.21–3.23).
- 3.5 It should also provide visual and acoustic privacy, and have characteristics which are sympathetic to the local environment. When selecting locations for permanent sites, consideration needs to be given to the relatively high density of children likely to be on the site.
- 3.6 Sites should not be identified for Gypsy and Traveller use in locations that are inappropriate for ordinary residential dwellings, unless exceptional circumstances apply. These circumstances would be where the location is unsuitable for housing, for practical or technical reasons which would not adversely affect the health and safety of Gypsy and Traveller residents or the sustainability of the site, and where the location has prospective residents' support. This could relate for example to a situation where:
 - Prospective residents are happy to live in a location which is not attractive to housing developers
 - Existing land is available to meet immediate need on a short term interim basis, pending a longer term solution, but not be available for a long enough period to justify housing development
 - Land is suitable for low level single storey development but not for multi storey construction requiring deeper foundations.

In such rare cases prospective residents should be made aware of these exceptional circumstances at the outset.

3.7 Where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments. As one way of helping to address shortages of site provision local authorities and registered social landlords can consider the feasibility and scope for providing a site for Gypsies and Travellers within their negotiations to provide affordable housing as part of significant new build developments. Even where smaller scale developments are planned they could consider including a small scale site of three to four pitches which are known to work well for single extended families.

Evidence provided to Select Committee on the importance of site location:

"What is working [in Ireland] are small sites. And they are not placed under flyovers or pylons, or beside sewers, canals or tips; they are placed on proper positioned land, bang within the middle of a settled community, and they are working." 204]

"We would make a strong plea for safeguards to be put in place to ensure that future site development is not located in polluted or hazardous locations, as... many sites are. Not only does this have a negative impact on Gypsies and Travellers health and access to services but it has a profound impact on how they feel they are perceived and treated by the wider community, likewise such locations reinforce the prejudiced perceptions that many in the settled community have of Gypsies and Travellers, such locations are therefore a major impediment to the social inclusion of Gypsies and Travellers." [205]

Relationship to surrounding land use

- 3.8 Consideration must be given to the relationship of sites to the surrounding community. For this purpose it is important to ensure that proposals to develop a site link in with other broader strategies in place for improving community cohesion and be regarded as a key issue within them.
- 3.9 The site must be sustainable, offering scope to manage an integrated coexistence with the local community. This will include consideration of noise and possible disturbance to Gypsy and Travellers living on the site, and possible noise and disturbance to the wider community, in particular from movement of Gypsy and Traveller vehicles.
- 3.10 Many Gypsies and Travellers express a preference for a rural location which is on the edge of or closely located to a large town or city consistent with traditional lifestyles and means of employment. However, characteristics that make a location unpopular for the settled community are likely to hold similar fears for Gypsies and Travellers. Sites adjacent to light industrial areas therefore tend not to be popular because of their isolation, distance from local facilities and because of safety fears (when walking home at night for instance).
- 3.11 Similarly, where joint commercial/residential use is envisaged for a site (as in the case of showpeople's sites because of the need for residents to store and maintain fairground equipment), it is important that the compatibility of both of these uses with the surrounding land uses is given careful consideration.

3.12 The case study below is a good example of a site integrated into the heart of an urban community.

Case Study 2

Wallman Place, London

The Wallman Place site is in Haringey, North London, and was refurbished in 1996 to provide a six pitch site for an extended family.

It is behind the civic centre, next door to a school, opposite a health centre, and close to a wide range of shops.

The site has a single access road through the middle, with three pitches on each side. There is space for a trailer, touring caravan and amenity building on each pitch. The brick built amenity buildings include central heating, bathroom and toilet facilities.

Whilst being close to all facilities the site also provides privacy for its residents and is well integrated into the surrounding community.

Scope to provide essential services

- 3.13 It is essential that sites are provided with access to mains water, electricity supply, drainage, and sanitation. Chapter 5 considers this in detail in respect of individual pitches.
- 3.14 Sewerage for permanent sites should normally be through mains systems.

 However in some locations this may not always be possible and in that case suitable alternative arrangements can be made, for example a biodisc sewage plant system.
- 3.15 All sanitation provision must be in accordance with current legislation, regulations and British Standards.

Health and safety considerations

3.16 Sites must not be located on contaminated land. Only where land has been properly decontaminated should development be considered on that land. Remedial work should only be undertaken by approved contractors in accordance with relevant standards, to ensure the contamination has been remedied to the standard on which housing development would take place. These processes can be prohibitively expensive and should be considered only where it is financially viable from the outset.

- 3.17 Brownfield sites may be suitable; however the same considerations should apply when appraising such sites as for conventional residential housing. For instance, sites adjacent to a rubbish tip, on landfill sites, close to electricity pylons or any heavy industry are unlikely to be suitable.
- 3.18 When considering sites adjacent to main roads, flyovers and railway lines, careful regard must be given to:
 - The health and safety of children and others who will live on the site; and
 - The greater noise transference through the walls of trailers and caravans than through the walls of conventional housing, and the need for design measures (for instance noise barriers) to abate the impact on quality of life and health.
- 3.19 The proposed site must be relatively flat and suitable for purpose. Sites should not be developed on exposed sloping sites where there is risk of caravans being overturned or where there is a high probability of flooding risk.
- 3.20 Where there is a risk from flooding the degree of risk must be determined prior to considering allocation or development of a site by reference to *Planning Policy Statement 25: Development and Flood Risk* (PPS25), the Environment Agency's Flood Map and the local planning authority's Strategic Flood Risk Assessment.
- 3.21 Annex D of PPS25 sets out a risk based sequential approach to be applied at all stages of the planning process. A Sequential Test is to steer new development to areas at the lowest probability of flooding. Table D.1 of that annex specifies three flood zones of low, medium and high probability. PPS25 table D.2 makes it clear that caravan sites for permanent residence are considered "highly vulnerable" and should not be permitted in areas where there is a high probability that flooding will occur (Zone 3 areas). Caravan sites which are occupied on a short term occupancy basis are classified as "more vulnerable" and proposals for their development in Zone 3 areas would need to pass the Exception Test outlined in PPS25, Annex D, if there are no other sites at a lower flood risk.
- 3.22 It is recognised that in some areas a high proportion of land is at risk from flooding (Flood Zones 2 and 3) but the requirements of PPS 25 should still be taken fully into account before taking any development proposal forward. Where a flood risk exists, advice from the Environment Agency should be sought at the earliest possible stage on the likelihood of flooding, depths and velocities that might be expected and the availability of warning services, to see whether the proposals might be acceptable.

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3.23 Where the Exception Test needs to be applied there may be opportunities to consider design issues, such as raising the level of a site so that accommodation will be above the expected flood level, taking climate change into account. This would protect amenity buildings, service provision etc that cannot be removed from the site when a flood warning is issued. However, a key consideration is that residents can safely evacuate the site in response to flood warnings and that emergency services would be able to reach the site to ensure residents' safety. This is an essential requirement to pass the Exception Test.

Chapter 4

Site layout, access and orientation – permanent sites

Introduction

- 4.1 Sites should be developed in accordance with existing planning policies and designations, with particular regard made to:
 - Convenience for residents
 - Safety for residents
 - Visual and acoustic privacy both for people living on the site and those living nearby
 - Aesthetic compatibility with the local environment
 - Scope for social integration with the local community.
- 4.2 This is an area where consultation with the local community of Gypsies and Travellers and with members of the settled community living in close proximity to a site can be particularly valuable and ensure best and most convenient use of available space.

Size and layout of site

- 4.3 For practical reasons, caravan sites require a greater degree of land usage per household than for smaller houses and Gypsy and Traveller sites are no exception. In making comparisons it needs to be recognised that there is for example no equivalent on a site to two or more storey accommodation in housing.
- 4.4 Gypsy and Traveller sites are designed to provide land per household which is suitable for a mobile home, touring caravan and a utility building, together with space for parking (see also Chapter 7 regarding individual pitches). Sites of various sizes, layouts and pitch numbers operate successfully today and work best when they take account of the size of the site and the needs and demographics of the families resident on them.

- 4.5 Consultation on this guidance has shown that many Gypsies and Travellers prefer a circular or horseshoe design rather than the more traditional linear layout of pitches. An example of a circular site, the result of close consultation between a local authority and representatives of the prospective residents for that site is featured at Annex B.1 of this document. This was originally intended to be a horseshoe site but was later extended to produce further pitches and the circular design resulted. An example of a more traditional site design is featured at Annex B.2 although these can differ considerably depending on the particular characteristics of the available land.
- 4.6 Consultation with the local Gypsy and Traveller community is crucial in deciding how best to proceed with the overall layout of the site and to get full value from the investment in it. It is a key element in obtaining the trust and full support of the prospective residents at the very outset of the project and can help deal swiftly with subsequent consultation on individual aspects of the design as and when they arise.
- 4.7 There is no one ideal size of site or number of pitches although 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 3-4 pitches can also be successful, particularly where designed for one extended family. These can be advantageous in making good use of small plots of land, whilst retaining the qualities described in this guidance and expected by families on modern sites. An example of a small scale site, in an urban environment, is featured at Annex B.3.
- 4.8 Sites should ideally consist of up to 15 pitches in capacity unless there is clear evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community. Nevertheless, where a larger site is unavoidable, or where one exists already, in a few cases smaller 'closes' have been created within the site for extended families, thereby retaining the sense of community and creating defensible space.
- 4.9 An example of this design approach is at Annex B.4. This arrangement could also open up possibilities for facilitating inter site transfers, where for example families may be offered the opportunity to move closer to other family members or elderly and dependant relatives where a pitch in a certain close may become available.

Site perimeter boundaries

4.10 The site boundary must provide clear demarcation of the perimeter of the site, so as to prevent nuisance for existing residents created by others seeking to move on to the site without permission. Boundaries should take into account adjoining land uses, and be designed with the safety and protection of children in mind.

- 4.11 Where an existing site may be located near an industrial area or process, or a main road, fencing and planting may be used to screen out unpleasant characteristics. A range of different boundaries may be used including fences, low walls, hedges and natural features. The aim should be to achieve a boundary that is sympathetic to, and in keeping with, the surrounding area. Boundaries can also be used to provide shelter for more exposed sites.
- 4.12 More open boundaries may be used in residential areas so as to promote integration and inclusion with the surrounding community, although the degree of integration which can be achieved will be in part governed by the degree of community cohesion already experienced in that location. A balance needs to be struck between providing privacy and security for the site residents and avoiding a sense of enclosure through for example, the use of high metal railings.
- 4.13 Measures to protect the safety of site residents from fire are of paramount importance, and it is essential that a clear gap of 3 metres⁴ is provided within the inside of all site perimeter boundaries as a fire prevention measure. Where owners of existing sites are experiencing difficulties in achieving this requirement because of current space constraints it is strongly advised that they consult their local fire authority as a matter of urgency to identify ways in which the residents safety can be properly safeguarded.

Orientation of pitches

- 4.14 As with housing for the settled community, site layout and design should ensure a degree of privacy for individual households (for instance by ensuring that neighbours cannot directly overlook each other's living quarters), but without inhibiting the important sense of community.
- 4.15 Consultation has identified that in general terms, particularly where site residents are members of an extended family, there is a preference for members of individual households to be able to have reasonable vision of the site in general to help improve security. This is an advantage of the circular or horseshoe site see example at Annex 1 which also allows clear views of the central play area to ensure children are safe (for more information on play areas see paras 4.38–4.41.).
- 4.16 On larger sites however, or those with a broader spectrum of residents, more seclusion and privacy may be preferred. In these cases, and irrespective of the general layout, preferences over the degree or privacy required can be addressed in part by the height of fencing provided between individual pitches, particularly to shield the amenity building, and by use of other soft landscaping approaches (see Chapter 7).

⁴ Model Standards for Park Homes

- 4.17 In designing the layout of a site enough space must be provided to permit the easy manoeuvrability of resident's own living accommodation both to the site and subsequently on to a pitch. Account needs to be taken of a more recent tendency for members of the Gypsy and Traveller communities to favour the use of a mobile home in place of the traditional caravan, and some mobile homes could be up to around 25 metres in length.
- 4.18 In order to overcome this, the site design should strike a balance between enabling a variety of accommodation to be catered for, and making best use of available space. Access roads and the site design itself should be capable of providing sufficient space for the manoeuvrability of average size trailers of up to 15 metres in length, with capacity for larger mobile homes on a limited number of pitches where accessibility can be properly addressed in the light of the land available. (For information on individual pitch sizes see Chapter 7).
- 4.19 In addition to movement of families on and off the site, site residents will sometimes wish to change the trailer accommodation they own and this movement can sometimes cause problems when boundary fences or gates do not allow for this. This is could be overcome by use of movable fencing and gates adjacent to the roadside which are capable of short term removal.

Health and Safety

- 4.20 When designing the layout of a site, careful consideration must be given to the health and safety of residents, and in particular children, given the likelihood of a high density of children on the site and relatively high levels of vehicle ownership amongst some groups of Gypsies and Travellers for towing caravans and employment purposes.
- 4.21 It is important to ensure that appropriate traffic calming measures are considered for all sites. Care should be taken when introducing speed humps and other measures, particularly to existing sites, to ensure that appropriate drainage is accommodated within the scheme to allow for the effective passage of surplus water.
- 4.22 Clear and effective signage should be introduced where a speed restriction or other traffic calming measure is to apply. Similarly, clear directions should be in place to indicate the location of hydrants and other access points for the fire service etc when attending an emergency on site.
- 4.23 The need for separate vehicular/pedestrian access should be considered.

Access for emergency vehicles

- 4.24 It is essential that consultation with local fire and rescue service officers take place at a very early stage of designing a site. Some authorities are reported to differ in advice as to a minimum turning and reversing requirements of emergency vehicles in confined spaces for example, which may impact on the number of pitches permitted. Subject to this, general good practice from recognised sources is outlined in the paragraphs below which can be used as a starting point prior to discussions with local emergency services.
- 4.25 In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles.
- 4.26 To enable this, suitable roads must be provided, with no caravan or park home more than 50 metres from a road⁵. Roads must have no overhead cable less than 4.5 metres above the ground. Vehicular access and gateways must be at least 3.1 metres wide and have a minimum clearance of 3.7 metres⁶.
- 4.27 Roads must not be less than 3.7 metres wide, or if they form part of a one way traffic system, 3 metres wide⁷.
- 4.28 One way systems should be clearly sign posted.
- 4.29 To increase potential access points for emergency vehicles, more than one access route into the site is recommended. Where possible, site roads should be designed to allow two vehicles to pass each other (minimum 5.5m8). Specific guidance should be sought from the local fire authority for each site.
- 4.30 Although roads on sites do not require adoption, it is recommended that all roads are constructed to adoptable standards to avoid future maintenance costs, and in anticipation of increased wear and tear due to frequent movement of heavy vehicles. Details of the relevant standards can be obtained from the local highways authority.
- 4.31 More guidance on aspects relating to aspects of street design and traffic flow can be found in the Department for Transport's *Manual for Streets*.

⁵ Source: Building Regulation B5 (2000) – 'Access And Facilities for the Fire Service'

⁶ Model standards for Park Homes

Model Standards for Park Homes, also Manual for Streets – Department for Transport, March (2007), and Statutory Instrument 2000 no.2531, The Building Regulations (2000). London TSO. Part 2, paragraph B5: Access and facilities for the fire service

⁸ Manual for Streets, Department for Transport (2007)

Security

- 4.32 Consultation has shown that site layout can play an important role in avoiding a sense of enclosure and isolation amongst Gypsies and Travellers. The aim should be to 'design out' crime and social exclusion and 'design in' community safety and social inclusion through openness of design, allowing ease in passing through, whether walking or driving. Care also needs to be taken to ensure that proper concern is shown for the safety of residents and children where car traffic passes through.
- 4.33 Before pursuing this approach however prospective residents should be consulted at the outset to ascertain the level of community cohesion already prevalent in the area, and to establish the degree to which those who are to live on the site are comfortable with this approach and if it meets the degree of privacy and security which is acceptable.
- 4.34 Site layout should maximise natural surveillance enabling residents to easily oversee all areas of the site. Scheme specific advice on security provision for the site should be obtained from the Police Architectural Liaison Officer for the area, and reference should be made to 'Secure by Design' standards to inform detailed planning of the site.
- 4.35 In cases where a site manager's office is provided on a site this should ideally be in a location which can be easily found by visitors and ideally situated at the front of the site ensuring that it has a view which increases security but is not intrusive to residents. An example of the facilities needed in a typical site manager's office include an office area, storage space and also washing facilities, which may be required where work on minor maintenance on site, possibly in bad weather will be needed. A plan of a typical site manager's office can be seen at Annex B.4.
- 4.36 To avoid disputes and provide defensible space, it is important to provide clear delineation of public communal areas eg play areas and private space, with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.
- 4.37 It is recommended that local needs and preferences are taken into account, as well as the requirements of the local highways authority and fire and rescue services, when designing the entrance to the site. Many Gypsies and Travellers are in favour of controlled access to sites, for example using a lockable gate. Their experience has been that such controls can prevent unauthorised parking and unauthorised caravans being pitched on the site. However, the presence of such gates can sometimes act as a psychological barrier to effective social inclusion.

⁹ ODPM and Home Office (2004) Safer Places: The Planning System and Crime Prevention. London: Thomas

Play areas

- 4.38 It is recommended that the inclusion of a communal recreation area for children of all ages is considered where suitable provision is not available within walking distance on a safe route or using easily accessible public transport, and for larger sites. Specially designated play areas should be designed where possible in consultation with children and parents, to ensure they provide equipment which will be best used, together with the site manager in view of ongoing maintenance issues.
- 4.39 Where recreation areas are provided, it is important to ensure they are designed and located with the safety of children in mind (taking account of the proximity of busy roads) and where they allow for natural supervision. Play areas should meet normal local authority standards.
- 4.40 Consultation has shown that locating play areas in secluded areas of the site and near boundary perimeters is not favoured as children could be subject to outside harassment and the play area and equipment open to vandalism. The location of the play area in the site design at Annex 1 avoids this and builds safety into account. Perimeter fencing is included to ensure that children are safe from passing site traffic.
- 4.41 For further guidance on play issues and related guidance please see *Better Places to Live by Design: A Companion Guide to PPG3*, DTLR, 2001 and Time for Play (dcms) 2006.

Landscape design

- 4.42 Many Gypsies and Travellers express a strong preference for soft landscaping (for example grassed areas, shrubs and trees) as opposed to hard landscaping such as paved or concreted areas although this can have an impact on the maintenance budget. Nevertheless provision of more attractive landscaping can enhance resident satisfaction and pride with the site on which they live and encourage participation with site management to help maintain the surroundings in which they live.
- 4.43 Soft landscaping can be used to ensure spatial separation which prevents movement of trailers to positions which would breach fire safety distances from the adjoining pitch. When designing a site to include soft landscaping, consideration needs to be given to preventing it from being used for unauthorised parking or unauthorised pitching of caravans.

Car parking

- 4.44 A key element for the site is the provision of adequate parking space for resident's use. Parking spaces must be a minimum of 2.4×4.8 metres¹⁰.
- 4.45 Resident parking should largely be provided for on individual pitches (see 7.3) but a site could also contain additional parking facilities for visitors, as parking on the roadside could otherwise impede access of fire and other emergency services. However separate parking areas may present security considerations for residents in some cases and should therefore be situated in an area in good sight of the warden's office and site residents generally.
- 4.46 More information on residential car parking and related issues can be found in section 8 of the Department for Transport's *Manual for Streets*.

Density and spacing of caravans and trailers

- 4.47 To ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately.
- 4.48 Other structures are allowed in the separation zone if they are made of non-combustible materials (such as a brick built amenity building), as long as they do not impede means of escape. For further guidance refer to the Model Standards for Park Homes.

Inclusion of space for work/animals

- 4.49 Gypsy and Traveller sites are essentially residential and those living there are entitled to a peaceful and enjoyable environment. Draft Communities and Local Government guidance on site management proposes that working from residential pitches should be discouraged and that residents should not normally be allowed to work elsewhere on site.
- 4.50 Where significant commercial or other work activity is still envisaged for a site it is very important to ensure that the site is delineated so that residential areas are separated from areas for commercial or work use.

¹⁰ Manual for Streets, Department for Transport (2007)

- 4.51 This also applies to the inclusion of space for keeping animals. Where there is demand for space for animals and where the site provider is satisfied that it may be reasonable and practicable to include this, a grazing area for horses and ponies could be provided, to reflect the cultural use of the horse as a traditional means of transport.
- 4.52 However grazing may be problematic and an adequate supply of grass difficult to sustain through over use when demand is high. Site managers may also enquire whether owners of land on the periphery of the site have surplus land for this purpose that could be provided at a reasonable rent.

Chapter 5

Site services and facilities – permanent sites

Introduction

5.1 As for any other kind of accommodation, consideration must be given to the infrastructure needed to support Gypsy and Traveller sites so that they meet the needs of residents and support good relations with people living nearby.

Water supply

- 5.2 It is essential for a mains water supply suitable for drinking to be provided for each pitch on the site, sufficient to meet the reasonable demands of residents. Water supplies must comply with current legislation, regulations and British Standards. Ideally water meters will be provided in amenity buildings by the relevant local authority for each pitch and must be for domestic usage.
- 5.3 Water pressure must be sufficient to enable the use of fire hydrants by the emergency services which should be at a convenient place near to the front of the site.
- 5.4 Provision of an outside tap on each pitch is strongly recommended.

Electricity supply

- The provision of mains electricity to each pitch is essential, sufficient to meet the reasonable requirements of the residents, and with separate meterage for each pitch. Ideally electricity meters will be provided in amenity buildings for each pitch by the relevant supplier directly and must be for domestic usage.
- 5.6 It is essential that underground cabling is adequately earthed and complies with current electrical installation regulations. Electrical installations must be inspected annually. All electrical work must be carried out by competent and appropriately qualified personnel.

Connection points

- 5.7 Consideration may be given to providing more than one electricity and water access point on each pitch to allow for trailers to be realigned either through resident's choice, family expansion or to cater for visitors.
- 5.8. Every effort should be taken to ensure that systems are in place to provide services to individual households, for payment purposes, and not sold from a central distribution point on site (see Chapter 5 with regard to metering).

Gas supply

- 5.9 It is essential that gas installations, supplies and storage meet statutory requirements, relevant standards and codes of practice. Storage facilities compliant with health and safety regulations for Liquid Propane Gas cylinders must be provided¹¹. Since the guidance on storage is complex, developers and managers of sites are advised to see advice from their local environmental health services.
- 5.10 It is essential that any mains gas installation is inspected and certified as safe on an annual basis.
- 5.11 Provision of a mains gas supply is recommended for amenity buildings on pitches and, if supplied, must be compliant with current gas installation regulations¹².

Oil fired central heating

5.12 Installations for oil fired central heating should meet Part L of the Building Regulations 2007 together with appropriate storage and safety arrangements in case of oil leaks.

Drainage

5.13 Surface water drainage and storm water drainage must be installed. All drainage provision must be in accordance with current legislation, regulations and British Standards¹³.

¹¹ LP Gas Association: Code of Practice 7: Storage of Full & Empty LPG Cylinders and Cartridges

¹² Safety in the installation and use of gas systems and appliances Approved Code of Practice and guidance L56 HSE Books (1998)

¹³ Planning Policy Statement 25: Development and Flood Risk (PPS25) and Manual for Streets Department for Transport (2007) Chapter 11.

- 5.14 This should be given early consideration in both site selection and scheme design.
- 5.15 Smaller drain covers could be considered as these can assist in preventing foreign objects becoming accidentally lodged in soakaways and gulleys.
- 5.16 Gypsy and Traveller sites may offer opportunities for implementing a Sustainable Drainage Systems (SUDS) approach for dealing with surface water drainage management whereby surface water runs off to either natural water courses or municipal systems.
- 5.17 More information on this and other surface water drainage issues can be found in section 11 of the Department for Transport's *Manual for Streets* (2006).
- 5.18 It is recommended that consideration be given to the inclusion of interceptors within the drainage system to ensure protection against petrol, oil and other absences within the surface of the water case system.

Sewerage

- 5.19 Wherever possible, each pitch should be connected to a public sewer when it is economic to do so. Where this is not possible provision must be made for discharge to a properly constructed sealed septic tank. All sanitation provision must be in accordance with current legislation, regulations and British Standards^{14.}
- 5.20 Consideration should also be given to additional waste disposal connection points as an outfall from resident trailers to avoid any problems over unauthorised connections.
- 5.21 The case study below illustrates the important influence that essential services have on quality of life.

¹⁴ Part H of the 'Building Regulations (2000), and Sewers for Adoption – Water UK (2006) Sewers for Adoption 6th edition Swindon WRc plc

Case Study 3

Abbey Close site, Hackney

The story of the Abbey Close site in Hackney, East London illustrates the importance of good services to the lives of Travelling communities.

In 1995 there were sixteen Irish Traveller families living on three tolerated sites in the Borough with no running water or toilets. When the area was due for regeneration, the families made representations and the council found a piece of land to be used as a temporary site until funding could be found to upgrade it and a second piece of land to adequately accommodate all the families. Sixteen families moved onto the temporary site. There was only a cold water standpipe provided for the families to share, and a portaloo for each family. The site was overcrowded, with no proper demarcation between pitches and poor drainage.

By 1999 the Travellers had secured strong support from the local community and the local councillor, who was also the Deputy Mayor. Despite this a shortage of funding delayed significant improvements. Some families moved off as they could no longer tolerate the lack of facilities, and others were given pitches on a nearby official site when they came vacant. The remaining families continued to campaign for better conditions with support from local community organisations and some improvements were made, for instance the provision of electricity, hardstanding and additional standpipes.

In 2002 funding was secured to refurbish the site and families were relocated during building works. The refurbished site provides each family with a clearly demarcated pitch with a private detached or semi-detached brick-built utility block, including a modern fitted kitchen and bathroom. The utility buildings, site boundaries and pitch boundaries are entirely in keeping with the architecture and features on surrounding estates and blend in well. The families were involved in all aspects of the site design and kept fully informed throughout, thereby able to ensure that design mistakes were kept to a minimum. In order to accommodate all the families left on the temporary site the pitches are small for growing young families, but the location and community support is ideal.

In September 2003 the remaining six families returned to the site, a 'Welcome Home' banner at the local school, and an opening ceremony that was attended by neighbours from the adjacent estates.

Lighting

- 5.22 Sufficient lighting must be provided on the site to enable safe access and movement through the site at night for both pedestrians and vehicles.
- 5.23 The street lighting arrangements should be planned to minimise the risk of damage through vandalism and avoid problems of light pollution to the homes on the site through light shining directly into caravans, amenity buildings or park homes. It should be planned to properly illuminate access roads and access to residential pitches.
- 5.24 Consideration should also be given to the introduction of three quarter length light pillars where there is a prospect that the site may create light pollution for the neighbouring community residing outside the site.
- 5.25 It is recommended that external lighting is provided on each amenity building to ensure safe access.
- 5.26 Solar powered street lights have been considered for inclusion on some sites to reduce energy use but have been found to be very expensive. It is recommended that a cost analysis case be undertaken to verify the financial viability of installation before proceeding.
- 5.27 More information on street lighting issues can be found in section 10 of the Department for Transport's *Manual for Streets*.

Waste disposal, scrap and storage

- 5.28 Residents of Gypsy and Traveller sites should receive the same waste disposal arrangements at their home as any other member of the community. Standard domestic waste disposal arrangements must be provided for each pitch in accordance with local authority requirements for the disposal of domestic waste¹⁵. A key element in designing the layout of the site is to ensure that sufficient space exists for local authority refuse collection vehicles to reach an appropriate point from which waste can be collected from individual pitches, as well as any communal refuse areas.
- 5.29 More information on this issues can be found in section 6 of the Department for Transport's *Manual for Streets*.

¹⁵ Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) and Schedule 1, Part H of the Building regulations (2000)

- 5.30 It is recommended that consideration be given to including a recycling collection point on the site where it is not in close proximity to one in the neighbouring vicinity.
- 5.31 Experience on some sites has shown that communal refuse areas can actually encourage fly-tipping and the accumulation of non-domestic waste. If a communal refuse area is deemed necessary (in addition to individual refuse collection for each pitch), this should be designed and located so as to be convenient, accessible, robust and inconspicuous. It should be located away from close proximity of individual pitches and from access points to the site, to ensure that fire service vehicles can enter the site and deal with any fire which might break out there.

Post

- 5.32 The site should be designed so that post can be delivered separately for each pitch. Experience has shown that postal deliveries to pitches can be disrupted by complaints about harassment by dangerous dogs so the provision of an individual box at the entry to a pitch would be advisable.
- 5.33 Consultation has shown that a simple but key element in helping to avoid discrimination against the residents of a Gypsy and Traveller site is to allocate site and pitch addresses which are of a similar nature to those for the settled community and which do not highlight that the accommodation is site based.

Communal facilities

- 5.34 Paragraphs 3.1–3.7 of this guidance outlined the key factors necessary for the right location for a sustainable site. Where these factors have been met it is likely that site residents will be in reasonable proximity of the facilities enjoyed by the community generally.
- 5.35 Where a site is isolated from local facilities however, either by distance or through lack of adequate public transport facilities and/or is large enough to contain a diverse community of residents rather than one extended family, provision of a communal building is recommended. This facility can be an important resource in sustaining a more remote site, offering an opportunity for visits by health visitors, youth workers and education services, as well as for use by site management and residents alike.

- 5.36 Any such building should include:
 - Community room
 - Toilets (male and female)
 - Kitchenette.
- 5.37 Ideally it should be situated in a location towards the front of the site, to be accessible to all the community, not just site residents, and if promoted and managed well can help encourage good relations between the Gypsy and Traveller and neighbouring communities.

Chapter 6

Health, safety and accessibility – permanent sites

Introduction

6.1 Everyone should be able to live in a home that is safe, whether that home is a house, a flat or a trailer. Health and safety considerations and requirements for sites are included throughout this guidance. Additional guidance is provided below.

Risk assessment

6.2 It is essential that site owners undertake a risk assessment of the site during the initial design stage, including the homes on the site.

Fire safety

- 6.3 Fire safety law changed in October 2006 with the introduction of the Regulatory Reform (Fire Safety) Order 2005 (the Order). The Order applies in England and Wales. It covers 'general fire precautions' and other fire safety duties, which are needed to protect 'relevant persons' in case of fire in and around most 'premises'. The Order requires fire precautions to be put in place 'where necessary' and to the extent that it is reasonable and practicable in the circumstances of the case.
- 6.4 Caravan sites come under the scope of the Order ("premises" includes 'any place') and is not excluded by article 6. (1). The only areas excluded by article 6. (1) are those covered by the interpretation of "domestic premises" ie premises occupied as a private dwelling (including any garden, yard, garage, outhouse, or other appurtenance of such premises which is not used in common by the occupants of more than one such dwelling). Caravans are considered private dwellings and as such fall under the category "domestic premises" and are therefore excluded from the Order. Any common areas on the site used by the occupants of more than one caravan come under the Order. The Order also applies to any amenity buildings on the site.

- 6.5 Responsibility for complying with the Order rests with the 'responsible person'. In the case of a caravan site, this could be an employer or any other person who may have control of any part of the site, eg occupier or owner, manager etc.
- 6.6 The 'responsible' person must carry out a fire risk assessment, which must focus on the safety in case of fire of all 'relevant persons'. It should pay particular attention to those at special risk, such as children, and must include consideration of any dangerous substance liable to be on the site. Fire risk assessment will help identify the risks that can be removed or reduced, and to decide the nature and extent of the general fire precautions that need to be taken.
- 6.7 The significant findings of the assessment should be recorded if the site is licensed or the site operator (eg the local authority) employs five or more staff, however, it is good practice to record the significant findings in any case.
- 6.8 The Order requires the 'responsible person' for the site to take such "general fire precautions" as will ensure, so far as is reasonably practicable, the safety of any of his employees and other relevant persons. General fire precautions include measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises (eg on the caravan site). Further guidance can be found in the Model Standards, for Park Homes. For example:
 - i. Pitches should be no more than 30 metres from a fire point. Fire points must be housed in a weatherproof structure, easily accessible and clearly and conspicuously marked 'Fire Point'. A clearly written and conspicuous notice should be provided and maintained at each 'Fire Point' to indicate the action to be taken in the case of fire, including details of the muster point. The Model Standards for Park Homes provide more detailed guidance.
 - ii. Water standpipes, hydrants, or fire extinguishers should be provided on each site as determined by the risk assessment and as informed by consultation with the local fire officer. All equipment should conform to relevant British/European standards. The Model Standards for Park Homes provide more detailed guidance.
 - iii. A means of raising the alarm in the case of fire should be provided at each fire point. This must be appropriate to the size and layout of the site and informed by consultation with the local fire officer. The Model Standards for Park Homes provide more detailed guidance.

- iv. All alarm and fire fighting equipment should be installed, tested and maintained in working order by a competent person. All equipment susceptible to frost should be suitably protected.
- 6.9 The level of necessary safety (or service) must be dictated by the findings of the risk assessment. The responsible person must be prepared to show that what has been done complies with any requirements or prohibitions of the Order irrespective of whether you have relied on a particular standard.
- 6.10 A series of guides and checklist have been developed which may assist the 'responsible person' to comply with the fire safety law and provide help to carry out a fire risk assessment. These guides and checklist are available from the Communities and Local Government website.

Accessibility

- 6.11 All private or communal buildings on the site must be provided to mobility standards as specified within Part M of the Building Regulations 2000. Developers must also have regard to the requirements of the Disability Discrimination Act 2005 both when designing the site and during refurbishment planning.
- 6.12 When considering the extent to which pitches, parking spaces and amenity buildings should be suitable for wheelchair users, reference should be made to local Gypsy and Traveller Accommodation Needs Assessments. Where no need has been identified it is recommended that at least one pitch in 20 on a site of such size, or one pitch per site where smaller, be constructed to meet the needs of a disabled resident as a contingency for future demand. Where provided, these should be consistent with the standards for housing for wheelchair users as set out in the Housing Corporation's Design and Quality Standards and other related guidance¹⁶.

Meeting Part M and Designing Lifetime Homes The Joseph Rowntree Foundation (1999), Wheelchair Housing Design Guide, Construction Research Communications Limited (1997), Inclusive Mobility, Department of Transport, (2005)

Chapter 7

Individual pitches – permanent sites

Layout of pitches

- 7.1 The layout of pitches will be dependent on the layout of the overall site. There will be different views about whether to have grassed areas and amenities at the front, back or side of the pitch. Discussion with the local Gypsy and Traveller community will be useful, however developers need to consider future as well as current or prospective residents.
- 7.2 Each pitch should be clearly demarcated to make it entirely clear what each individual household may occupy in return for the fee paid and their responsibilities for the pitch they occupy. A range of different boundaries may be used including fences, low walls, hedges and natural features. The aim should be to achieve a boundary that is clear but which is sympathetic to, and in keeping with, the surrounding area.
- 7. 3 Pitch boundary fences should provide a balance between good neighbourliness and privacy. For example fencing between pitches could be up to 6 feet in height, particularly where amenity buildings would otherwise be overlooked, whereas 4 foot high fencing around the front of the pitch will offer good surveillance of the road and the site in general.
- 7. 4 More information on designing for privacy can be found in *Better Places to Live by Design* and section 6 of *Manual for Streets*, Department for Transport (2007).¹⁷

Hard standing

7.5 Each pitch must include a hard standing area constructed of concrete or a similar suitable hard wearing material which extends over the whole area to be occupied by a trailer, touring caravan or other vehicle. These standings must be constructed in accordance with the industry code of practice¹⁸ and project a sufficient distance outwards to enable occupants to enter and leave safely. The base must be sufficient to bear the load placed on it by the home or vehicle and its contents, and the anticipated level of vehicle movement.

¹⁷ Better Places to Live by Design: A Companion Guide to PPG3, DTLR, 2001

¹⁸ The 'Gold Shield' which specifies compliance with BS 3632:2005 Residential park homes

- 7.6 Hardstanding should be part of the landscape design. The pitch width need not be entirely paved but could be designed to break monotonous design with soft landscape. Where soft landscaping is adopted in the design consideration should be given to the inclusion of a storage facility on each pitch for residents to keep equipment to maintain it.
- 7.7 Local authorities and other developers should consider the environmental impact of the site and the measures that might be taken to improve sustainability. For example, the inclusion of separate identifiable containers for the collection of recyclable waste and provision of water butts is recommended.

Size of pitch

- 7.8 In common with some other ethnic minority communities, some Gypsies and Travellers often have larger than average families, for instance where members of an extended family live together. For this reason there is likely to be much greater demand amongst these communities for large family units, and small pitches may become quickly overcrowded. Larger than average family sizes, alongside the need for vehicles for towing trailers and for employment also creates particular requirements for parking.
- 7.9 There is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. In designing a new site, account should be taken of the likely characteristics of families on the waiting list and identified as a result of the Gypsy and Traveller Accommodation Needs Assessment, as there may be a larger element of families with children approaching teenage years, who are likely to need to supplement their accommodation with one or two additional small touring caravans on the pitch as separate sleeping accommodation, until their children are old enough to move on to a separate pitch.
- 7.10 Some families may also be in possession of larger mobile homes and one or two pitches should be designed where possible to cater for that possibility (see also paragraphs 4.17–4.19 re manoeuvrability).
- 7.11 Alternatively, potential residents may be single or elderly members of the community, who would not need a pitch of the same size.
- 7.12 Nevertheless, as a general guide, it is possible to specify that an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed (for bicycles, wheelchair storage etc), parking space for two vehicles and a small garden area.

- 7.13 Smaller pitches must be able to accommodate at least an amenity building, a large trailer, drying space for clothes and parking for at least one vehicle).
- 7.14 Individual parking spaces should be a minimum of 2.4×4.8 metres¹⁹.
- 7.15 Where space permits the inclusion of a garden or playspace on each pitch is recommended.
- 7.16 Drainage falls must comply with Part H of the Building Regulations 2000. Ideally the pitch should be level apart from drainage falls.

Amenity buildings

- 7.17 It is essential for an amenity building to be provided on each pitch, although this can be provided across two pitches as two separate and entirely self contained semi-detached units. The amenity building must include, as a minimum: hot and cold water supply; electricity supply; a separate toilet and hand wash basin; a bath/shower room; a kitchen and dining area. The access to the toilet should be through a lobbied area or by separate access direct from the pitch.
- 7.18 The amenity building must include: secure storage space for harmful substances/ medicines; enclosed storage for food, brooms, washing, cleaning items etc; and space for connection of cooker, fridge/freezer and washing machine. The provision of a gas hob could be considered.
- 7.19 The inclusion of a day/living room in the amenity building for family meals is recommended. The day/living room could be combined with the kitchen area to provide a kitchen/dining/lounge area. It is desirable that the day/living room should not be part of essential circulation space, nor contain essential storage. Many existing amenity buildings do not of course contain this facility but inclusion in new sites would replicate the provision of a living room as enjoyed as standard by other sectors of the community. A plan of a typical modern amenity building is featured at Annex B.6.
- 7.20 The design and construction of amenity buildings must meet the requirements of the current Building Regulations, the Institution of Electrical Engineers regulations²⁰, and the Local Water Authority and should also meet the Housing Corporation Design and Quality Standards. Materials used must comply with the relevant British Standard Specifications and Codes of Practice and must provide for durable and low maintenance buildings. Its construction should be sympathetic to local architecture, attractive and of a domestic nature and meet the requirements of PPS3.

¹⁹ Manual for Streets, Department for Transport, (2007)

²⁰ IEE Wiring Regulations (16th Edition) available at www.iee.org

- 7.21 It is recommended that amenity buildings incorporate cost effective energy efficiency measures. The building layout and construction should be designed to maximise energy conservation and the use of passive solar gain. All mechanical and electrical systems should be as energy efficient as possible. Consideration should be given to the insulation of plumbing systems, the use of low energy light fittings and appropriate heating and ventilation systems. Any opportunities for using energy from renewable sources should be considered. It is desirable to produce an assessment of materials and construction techniques proposed for the site against standards set out in *The Green Guide to Housing Specification*²¹.
- 7.22 Adequate and sensibly situated electrical outlets, switching and controls should be installed throughout the amenity building.
- 7.23 Means of heating should be installed throughout the amenity building which provides temperatures suitable for room use, which is economical and capable of individual control for each room.
- 7.24 The width of main entrances, doorways and passageways must comply with building regulations to ensure mobility standards.
- 7.25 Fixtures and fittings in the amenity building should be of a domestic nature, but robust.
- 7.26 In line for standards for social housing other recommended features²² include:
 - Glazing lines in living/dining areas that are no higher than 810mm above floor level
 - Hot water taps to baths with a thermostatically controlled supply
 - Adequate screening and wall tiling provided where showers are provided over baths
 - A worktop-cooker-sink-worktop sequence that is not broken by doors, passages or tall units
 - A 1.2 metre run between the cooker and sink
 - A 500 millimetre minimum clear work top each side of the cooker, and wall units set back minimum 100 millimetres
 - A space for additional equipment such as a microwave
 - Walls in bathrooms and WCs must be designed to take support aids
 - Smoke/fire detectors.

²¹ The Green Guide to Housing Specification available from the Building Research Establishment at www.bre.co.uk

²² Design and Quality Standards, Housing Corporation

Case Study 4

Severalls Lane Site, Colchester

Work on the proposed new site at Severalls Lane, Colchester began in 1999 with planning consent given in November 2006. The aim was to provide a site to accommodate Gypsies and Travellers living in or regularly travelling to the Colchester area. The Gypsy and Traveller community was involved in the design from the very start. They worked with the surveyors on the drawings and visited sites of different designs to highlight what did and didn't work on these existing sites. The site plans were finalised with the agreement of the Gypsy and Traveller community – both those working closely with the surveyors and other people living on existing sites.

The site is within easy access of a major trunk road, whilst still offering both privacy and good access to local services. The access road will be a bituminous macadam road surface. The internal oval road block will be paved and have strategically placed speed restricting ramps. The road layout allows for manoeuvring static units on and off all pitches. There will be a site manager's office with good storage space and a secure refuse/recycling area.

The new design provides a 12 pitch site around an oval shaped road, with a central fenced play area, creating a safe environment for children to play where they can be seen from all 12 pitches. Close boarded fencing will be provided between each pitch to give privacy and avoid loose debris, such as leaves, being blown across the site and into pitches. The delineation of individual pitches was regarded as a 'must', and Gypsies and Travellers were keen to avoid a 'no mans' land' which could encourage fly tipping.

Pitch sizes allow for the accommodation of up to three caravans, or one large static trailer plus a touring caravan to allow for travelling during the year. There will be different surfaces within the pitches. Apart from the necessary concrete hard standing there will be tarmac areas and a red brick paved patio and footpath around the amenity buildings. Each pitch will have a small garden area to the rear of the pitch where there will be a footpath access and hard standing for a shed or kennel and a position to stand a rotary line for washing. The Gypsies and Travellers requested this to allow for a place to hang the washing that would not impact on the look of the site from the access road.

Each pitch will have a semi-detached single story amenity building. These will be larger than those on the majority of existing sites, with a kitchen and separate lounge/dining area, plus a bathroom and storage space. The living area will look out to the front of the site to allow for views across it. To avoid the 'institutional' look of the amenity buildings on the existing site, a variety of building materials will be used.

Some will be brick built, others will be half-brick, half-weather boarding. The material for the roof will be either plain tiled or slate. There will be hardwood domestic front doors to each amenity building. There will be a post box at the front of the pitch to allow for individual delivery of mail without a need to access the pitch.

Chapter 8

Transit sites

Introduction

- 8.1 Although transit sites may be in use all year round, they are not intended or designed to be used as permanent accommodation by individual households. The guidance below therefore reflects that expectation. However developers should note that, in the past and due to the shortage of permanent sites, some transit sites have become permanent sites by default, even though the standard of facilities provided are not conducive to long term stays.
- 8.2 Views are mixed on the extent to which transit pitches can be successfully provided on permanent sites. Where this has been successful the transit pitches are usually provided adjacent to the main site, or at one end of it.

Site selection/location

- 8.3 The guidance for permanent sites largely also applies to transit sites except that the importance of proximity to community facilities is primarily in respect of the need for access to schools.
- 8.4 The presence of children on the site, and potential health and safety risks for them and other residents should receive equal consideration for transit sites.

Site layout, access and orientation

- 8.5 **Number of pitches** For a transit site to be easily managed it has been shown that the number of pitches should not normally exceed 15.
- 8.6 **Site boundaries** The guidance for permanent sites applies.
- 8.7 **Orientation of pitches** The guidance for permanent sites applies.

- 8.8 **Health and safety** The guidance for permanent sites applies.
- 8.9 **Access for emergency vehicles** The guidance for permanent sites applies.
- 8.10 **Security** The guidance for permanent sites applies.
- 8.11 **Balance between soft and hard landscaping** The guidance for permanent sites applies although soft landscaping on transit sites can be more difficult to maintain. As transit sites are only intended for short stays there is less need for soft landscaping but this does not rule out maintaining the general ambience of the site to a limited and cost effective degree.
- 8.12 **Parking** In the light of experience it is recommended that parking space for at least two vehicles is provided on each individual pitch at a minimum size of 2.4m x 4.8 metres each.
- 8.13 **Density and spacing between vehicles** The guidance for permanent sites applies, except where the local Fire Officer has agreed alternative arrangements that provide the same degree of fire safety.
- 8.14 **Inclusion of work/animal space** The guidance for permanent sites applies.

Site services and facilities

- 8.15 **Accommodation for a Resident Manager** Transit sites may present particular management challenges and depending on local circumstances and sufficient usage, it is recommended that provision is generally made for a resident manager. As the resident manager will be living on the transit site on a semi-permanent basis, facilities for the manager should comply with the guidance for permanent sites, including the provision of an amenity building. A plan of a typical resident manager's accommodation, with office area, is at Annex B.7.
- 8.16 **Water supply** The guidance for permanent sites applies.
- 8.17 **Electricity supply** Where possible, the guidance for permanent sites applies, although in practice a central electricity supply administered by the site management may be provided, which would entail residents paying by meter or being charged cash retrospectively.
- 8.18 **Gas supply** Mains gas supplies are not applicable to transit sites.
- 8.19 **Drainage** The guidance for permanent sites applies.
- 8.20 **Sewerage** The guidance for permanent sites applies.

- 8.21 **Lighting** The guidance for permanent sites applies.
- 8.22 **Waste disposal** Waste disposal for individual pitches on transit sites is recommended. Communal refuse disposal should be provided which is convenient (but away from pitches and associated dwellings on site), fenced off, robust and inconspicuous.
- 8.23 **Sluice** A sluice should be provided on each site.

Health and safety

- 8.24 **Risk Assessment** The guidance for permanent sites applies.
- 8.25 **Fire Safety** The guidance for permanent sites applies.
- 8.26 **Accessibility** The guidance for permanent sites is optional.

Individual pitches

- 8.27 **Hard standing** The guidance for permanent sites applies.
- 8.28 **Size of pitch** It is important to ensure that wherever possible each pitch is of a size sufficient to accommodate two touring caravans, two parking spaces and private amenities.
- 8.29 **Private amenities** It has been found that the majority of Gypsies and Travellers prefer private amenities on each pitch including a toilet, wash basin and shower with hot and cold water supply. An illustration of a simple fixed utility building for a transit site is at Annex B.8).
- 8.30 Depending on the degree of usage, consideration could be given to providing portable facilities on a transit site to meet these needs. Where transit sites are empty for lengthy periods there is a risk of vandalism to facilities and it may be preferable for these to be removed until the site is reoccupied. In adopting this approach, it is sensible to ensure that permanent waste and water pipework is in place for facilities to be easily reinstalled.

Case Study 5

Clearwater Site, Chichester

The Clearwater site, near Chichester, is an example of a privately owned and run site which incorporates both permanent and transit pitches. It is a very attractive, green site on the edge of a village in a rural location, and with good access to the road network. The owner has planned the site specifically to enable future growth in both the number and size of households, without members of the extended family having to be overcrowded, displaced to another site or left homeless.

The owner recently received planning permission to add six transit pitches to the existing permanent site. It will not operate as an openly available transit site but will be available to family and other visitors of existing residents. Each transit pitch will have its own amenity building with toilet, shower and kitchen. Pitches will have space for two trailers, and planting is used to mark the boundary between each.

There are four permanent pitches on the site, with space for a further four to accommodate future needs. The pitches are spacious, and each incorporates an amenity building which is 10' wide by 20' long, with kitchen/laundry and bathroom.

There is a children's play area on the site. Residents are able to graze animals on the adjoining field.

Chapter 9

Temporary Stopping Places

Introduction

- 9.1 Temporary stopping places accommodate intermittent needs for site accommodation for which a charge may be levied as determined by the local authority concerned. They are not occupied all year around but may be made available at times of increased demand, such as fairs or cultural celebrations that are attended by Gypsies and Travellers.
- 9. 2 The guidance below sets out the important features of temporary stopping places.

Site selection/location

- 9.3 Temporary stopping places should provide safe and convenient access to road networks and be located so as to cause minimum disruption to surrounding communities.
- 9.4 When considering the suitability of different sites, the potential presence of young children and any risks that may arise due to adjoining land uses must be considered.

Site layout, access and orientation

- 9.5 It is important to provide markings or barriers to encourage residents to park safely, allow access for emergency vehicles, and enable maximum use of the site in accordance with its intended capacity and fire safety standards. Particular regard must be given to the need to ensure a safe distance between trailers/caravans and other structures made of combustible materials. The advice of the Local Fire Officer must be sought during the planning of temporary topping places.
- 9.6 The road to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers.
- 9.7 There must be a clear barrier around the emergency stopping place to discourage unauthorised expansion of the site.

Site services and facilities

- 9.8 It is essential for a cold water supply to be provided for the use of site residents which may be by use of water standpipe or bowser.
- 9.9 Portaloos must be provided for the use of residents, with separate provision for men and women. There must be at least one portaloo for every four households on the site.
- 9.10 It is essential for a sewerage disposal point to be provided.
- 9.11 Refuse disposal facilities should be provided.

Health and safety

9.12 The guidance for permanent sites applies.

Chapter 10

Consultation

Introduction

- 10.1 This guidance is not intended to replace local consultation with Gypsies and Travellers and other key agencies. Local consultation should include:
 - Gypsies and Travellers from the communities whose needs will be met on the site, including if possible, the families who will move onto the site at first let
 - Planners from the very first stages of site identification
 - The Fire Officer
 - The Police, for advice on site security
 - The Local Highway Authority
 - Site managers and maintenance officers who can advise on the design features that can promote good management and keep costs to a minimum.
- 10.2 The same principles apply to consultation on Gypsy and Traveller sites as with other refurbishment projects and new developments. Very few architects and developers will have first hand experience of living on a site as part of a Gypsy or Traveller community, and consultation with Gypsies and Travellers will be crucial to ensuring the site works successfully.
- 10.3 The needs and preferences of those who will live on the site should be given full consideration and should be met as far as is possible within available resources. People who have lived on sites for most or all of their lives are in the best position to advise on what works well and what doesn't for a particular community. However, the needs of those people who will move onto the site at first let, will need to be balanced with the needs of those who may live on the site at a later stage.

When to consult?

10.4 Gypsies and Travellers should be consulted throughout all stages of the design process, including site identification through the local authority's Local Development Framework. Local communities can be aware of factors which, despite site shortages, could prevent take up of site places in particular areas.

Consultation

Evidence provided to Select Committee

"Gypsy and Traveller families often wish to have small compact and well-managed sites located in areas where they have historically resided and have a network of local family support. Local authorities have in the past tended to provide accommodation in inappropriate areas and the sites have therefore not always been used to their full potential. As with the settled community, Gypsy families prefer clean well-managed sites where there is no fear of retribution from problem families and they can enjoy a peaceful coexistence. [...]. Caution should be used when seeking locations for sites to ensure that they are based on need in a particular area and not the availability of inappropriate land for alternative uses. Traditionally, Gypsy sites have been located on land which is inappropriate for alternative uses and this, in itself, has caused problems both for the Gypsy community and for Site Managers." [210]

10.5 There is no reason why Gypsies and Travellers cannot be included in all design meetings with architects, so that expensive design mistakes are not made and so that professional perceptions of what will work well can be challenged if necessary at an early stage.

Methods of consultation

- 10.6 Local authorities should now have an established record of joint working with the Gypsy and Traveller community following the conduct of Gypsy and Traveller Accommodation Needs Assessments. It is recommended that an RSL wishing to work with these communities for the first time consult with the appropriate local authority at the outset to secure its own introductions.
- 10.7 Where difficulties remain introductions can usually be secured through other organisations which already have a good working relationship with members of these communities. This is often the case for the Traveller Education Service and health advocates, but may not necessarily be the case for existing site managers/ liaison officers, some of whom may have an enforcement role that has brought them into conflict with the communities in the past.
- 10.8 Participation will be greatly improved by holding the consultation in familiar and informal surroundings that are easy to get to, comfortable and warm. The office of a local organisation working with Gypsies and Travellers, or a local community building might be appropriate for instance.

- 10.9 There are low levels of literacy in some sections of the community. It is important therefore that consultation does not rely on written methods such as leaflets, surveys or feedback forms. Face to face consultation which enables Gypsies and Travellers to influence rather than just respond to the consultation agenda is important. Provision of models and computer generated images of proposed site development will also help prospective residents visualise the outcome and help identify useful refinements which may not otherwise be immediately apparent.
- 10.10 In some cases it may be appropriate to use a small number of people from the communities to represent their interests, however there is a danger with this type of approach that the perspective of some parts of the community will be missed for instance children, women or men, or older people.
- 10.11 It would be beneficial to ensure as far as possible that sympathetic and knowledgeable architects and contractors are employed in the site design process. Local authorities could offer an "awareness raising" session on Gypsy and Traveller culture at an early stage with representatives of the local Gypsy and Traveller community, as a means of opening the dialogue and ongoing consultation needed with prospective residents to best ensure the successful design and construction of the site and best value for the money invested in it. Project managers could use suitably qualified and trained tenant liaison officers as used in social housing development.
- 10.12 The timing of the consultation will be important. For instance women are more likely to be able to take part in consultation that takes place on sites during the day (and outside school pick up hours) whereas men may be more likely to be able to make evening meetings.
- 10.13 One to one interviews are one method of consulting, but they can be time-consuming and do not provide an opportunity to attempt to resolve differing opinions. Focus groups can be a good way to encourage discussions around matters where there are differing perspectives and where there is a need to achieve a consensus position. If some tensions between different members of the community are anticipated then small meetings or group discussions will work better than large meetings.
- 10.14 Where prospective site residents or those already living on a site which is to be refurbished have appropriate skills, consideration could be given to proposing their involvement in the work required, provided they are included on the appropriate register of preferred contractors.
- 10.15 Gypsy and Traveller Accommodation Needs Assessments may gather views on site design and ask about satisfaction with existing sites. This information should be drawn upon where available.

Case Study 6

South Liberty Lane site, Bristol

Bristol County Council used 'Planning for Real' methods to consult with Gypsies and Travellers on the design for a new permanent site. This method of consultation involves making a three dimensional model of the area to be developed/improved. This encourages consultees to consider the area as a whole and how the different elements of their environment impact upon one another. They started by getting Gypsy and Traveller children to make models of the site, and made this into a fun event. The parents then became curious and got involved too. Consultation was carried out on a range of existing sites and at Stowe Fair.

The result of this consultation has been a 'state of the art' 12 pitch site. Many of the features were directly influenced by the consultation, including:

- Semi-detached utility buildings that incorporate a day room, kitchen, bathroom/toilet and separate toilet
- Boiler and central heating in utility buildings
- A variety of power points on each pitch to enable flexible positioning of trailers and caravans and avoid trailing wires
- The use of built-up flower beds to prevent trailers being positioned too close to each other
- Low walls and gates separating each pitch and creating 'defensible' space
- Parking on individual pitches
- Communal playspace for children.

Feeding back on the results of consultation

- 10.16 It will not always be possible to meet the needs and preferences of everyone and, if the reasons for this are explained clearly, this will normally be understood by participants. As a common courtesy the results of any consultation should always be fed back to the individuals and/or communities concerned. Where it has not been possible to meet the expressed preferences of the community the reasons for this should be clearly explained.
- 10.17 Once the site has been developed, this consultation process offers the basis of a permanent resident's forum, which can help sustain a good co-operative spirit of consultation between site managers and residents, a key element in managing a site successfully.

Consulting with the settled community

- 10.18 As for other kinds of development, it is important that members of the local community, whether Gypsies and Travellers or settled residents, are able to feed in views on plans for new sites.
- 10.19 Misinformation and limited contact between Gypsies and Travellers and the settled community can feed distrust and misconceptions, and these must be challenged and addressed proactively. Opposition from the settled community can delay, and in some cases prevent, the issue of planning permission for new sites. Councils and other developers need to plan for the possibility of such opposition at an early stage in the development and provide accurate information to help overturn negative stereotypes and allay concerns.
- 10.20 It will be important to demonstrate the need for new site provision in any consultation with the settled community, and the steps that the council or private developer will take to address concerns and deal with problems should they arise.

Case Study 7

Transit Site Development, Southampton

Southampton City Council has recently granted cabinet approval to allow a planning application to be made for a six pitch transit site on the outskirts of the city.

Local residents were sent a letter and information sheet setting out the proposed nature of the development and inviting them to attend public meetings. A phone hot line, email address and postal address were set up to receive comments.

The proposal was processed through both a full cabinet meeting and cabinet consultation meeting – all of which were open to the public. Local community representatives and individuals spoke at each meeting, as did a member of the Romani Rights Association.

Cabinet decided to defer the final decision for three weeks until after a public information day had been held.

The information day consisted of two drop-in events which were held in different locations both close to the proposed site and a public meeting in the larger of these two venues.

All events were held on the same day, a Saturday between 9 am and 4pm, and were attended by out of area speakers, including the Head of Kent Gypsy and Traveller Unit and the South East Regional Advisor on Gypsies and Travellers, as well local police and council officers from planning, community safety, inclusion, education and other teams.

A series of question and answer sheets were prepared for an Information Day that was attended by 450 local people. These covered: site selection and costs (which included evidence of need for the site); design and environmental matters; security, crime and community safety and having Gypsies and Travellers as neighbours. As well as providing information about the proposed development the sheets also tackled common prejudices head on. Objections from the local settled community focused on fears of increased anti-social behaviour and 'hawking', impact on local traffic conditions, potential overspill onto surrounding land; safety issues linked to the adjoining railway line, and potential negative impacts for local small businesses.

The consultation process demonstrated that the council was prepared to listen to the views of local people and devote resources to addressing concerns raised. As a result of the consultation, the council has set up a management group that includes representatives from local businesses and residents as well as agencies such as the police and schools, which will respond to any issues as they arise. It has also increased security proposals for the site, including the installation of closed circuit television and escalating charges for pitches on the site to discourage overstaying.

Annex A

Key References

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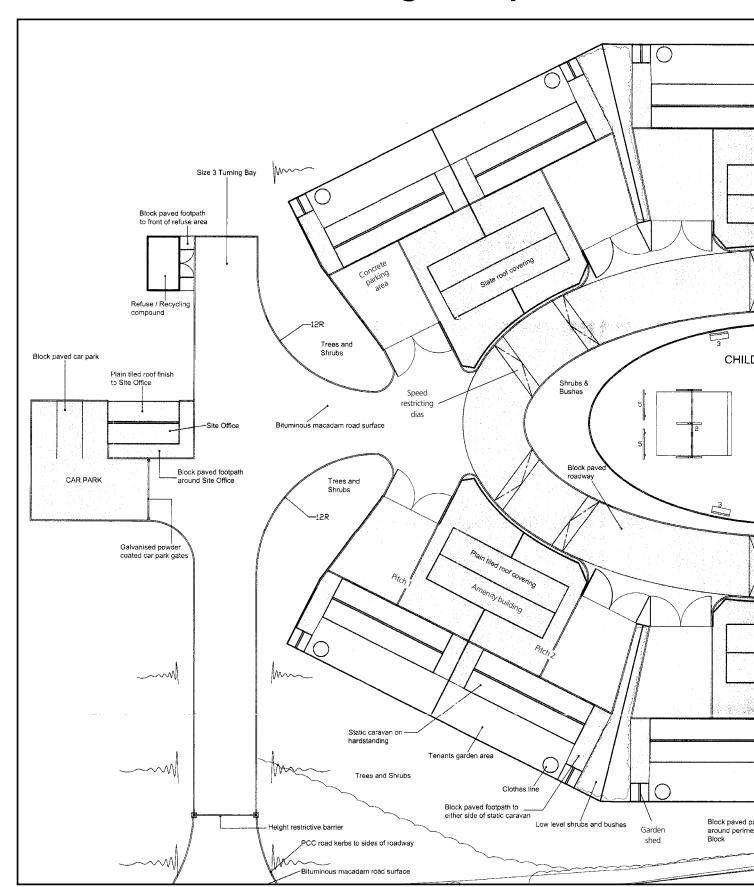
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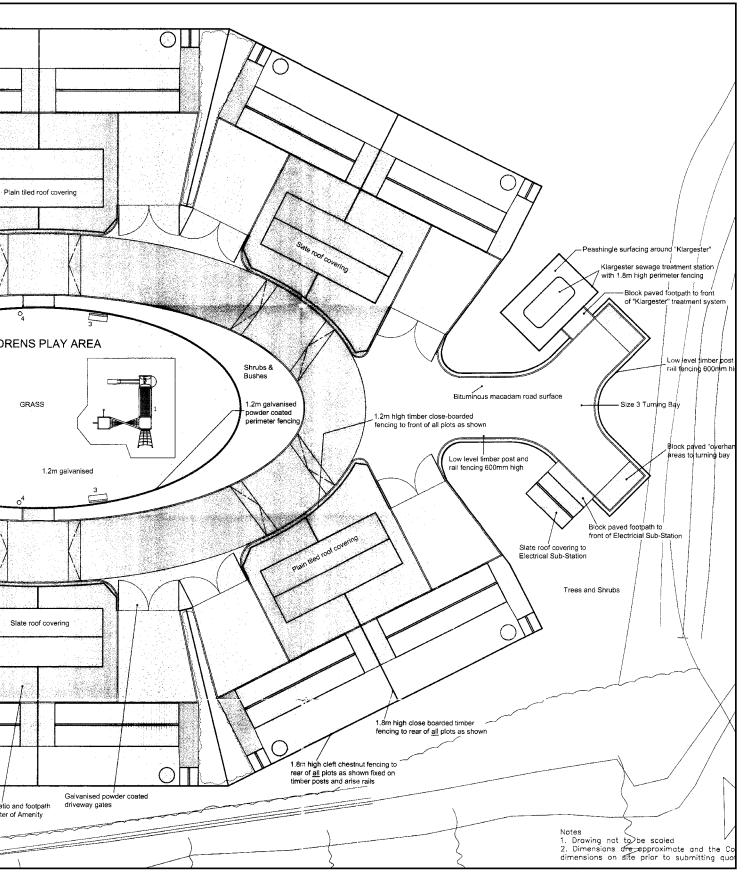
DTLR – Better Places to Live by Design: A Companion Guide to PPG3, 2001

Travelling Showpeople's Sites – A planning focus. Model Standard Package'. Available from the Showmen's Guild of Great Britain, Guild House, 41 Clarence Street, Staines, Middlesex TW18 4SPY. Tel: 0784 461805

Annex B.1 Circular site design (see para 4.5)



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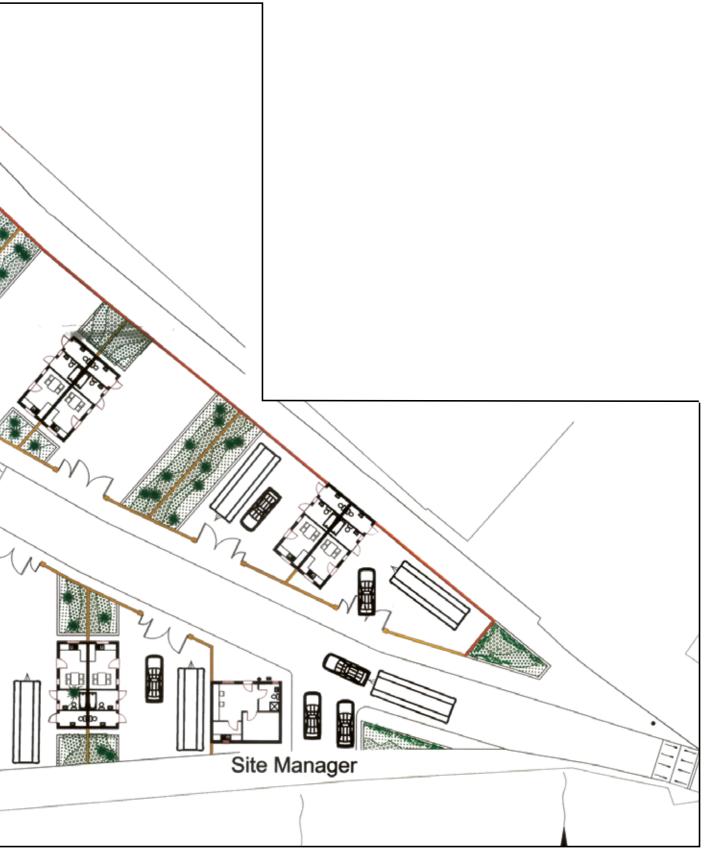


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Annex B.2 Traditional site design (see para 4.5)

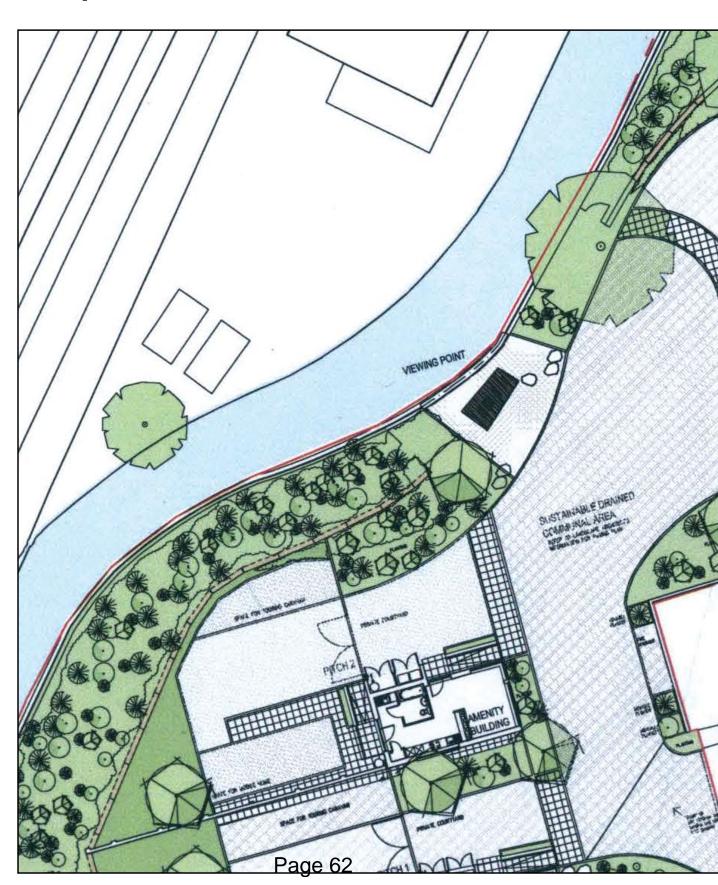


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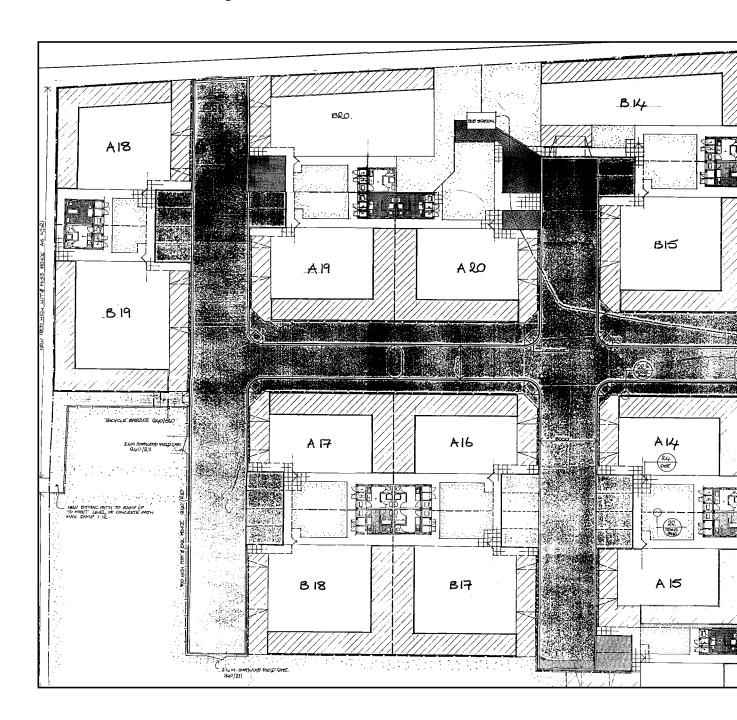
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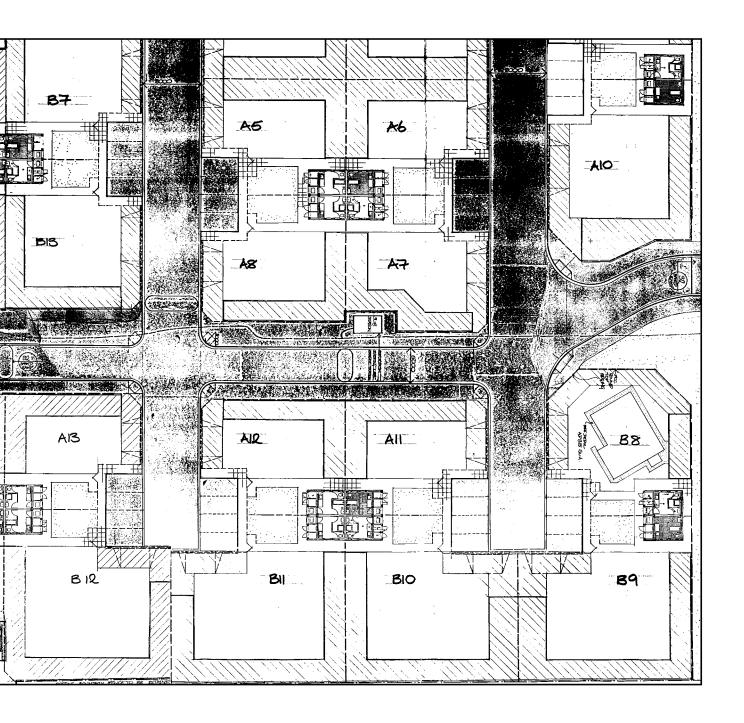
Annex B.3 Small scale site – urban location (see para 4.7)





Annex B.4 Large site with small individual "closes" (see para 4.9)

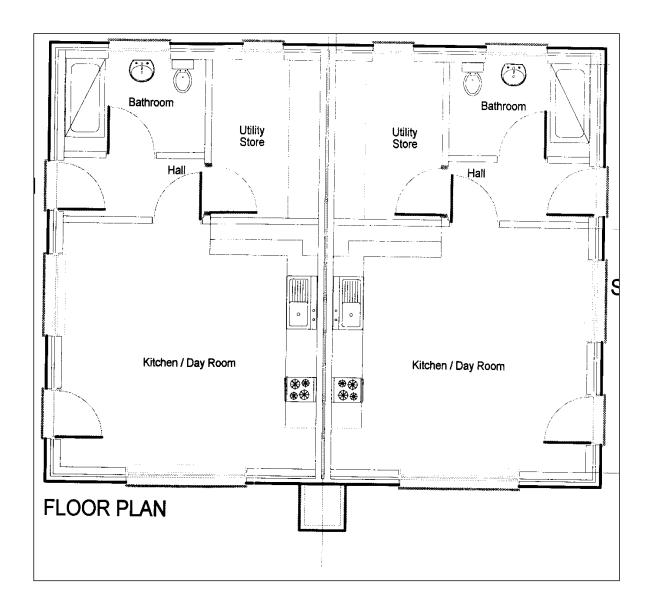




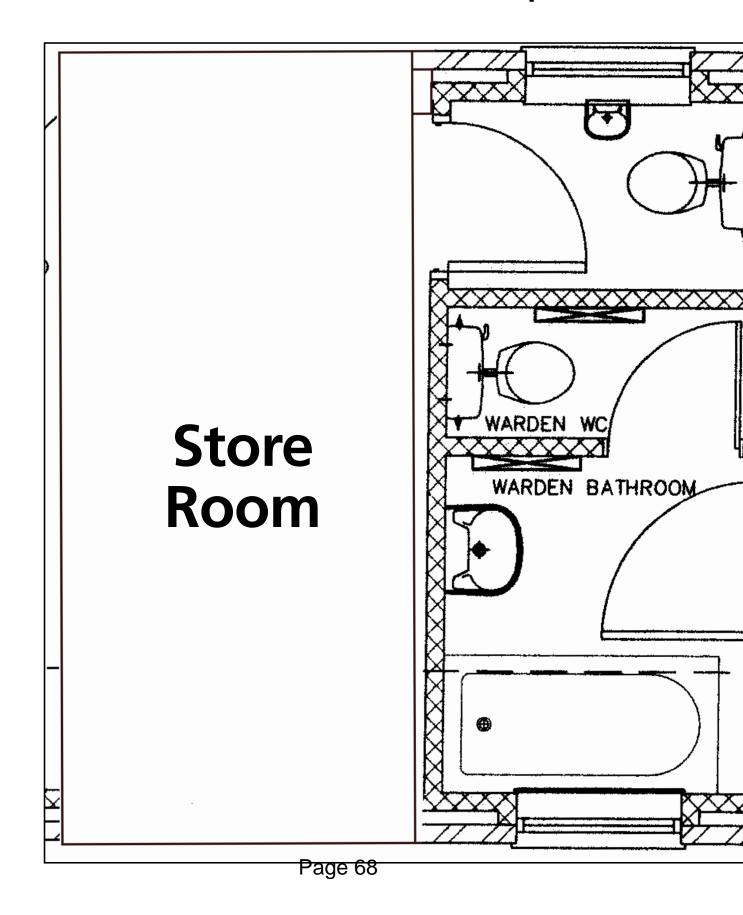
Annex B.5 Site manager's office – permanent site (see para 4.35)

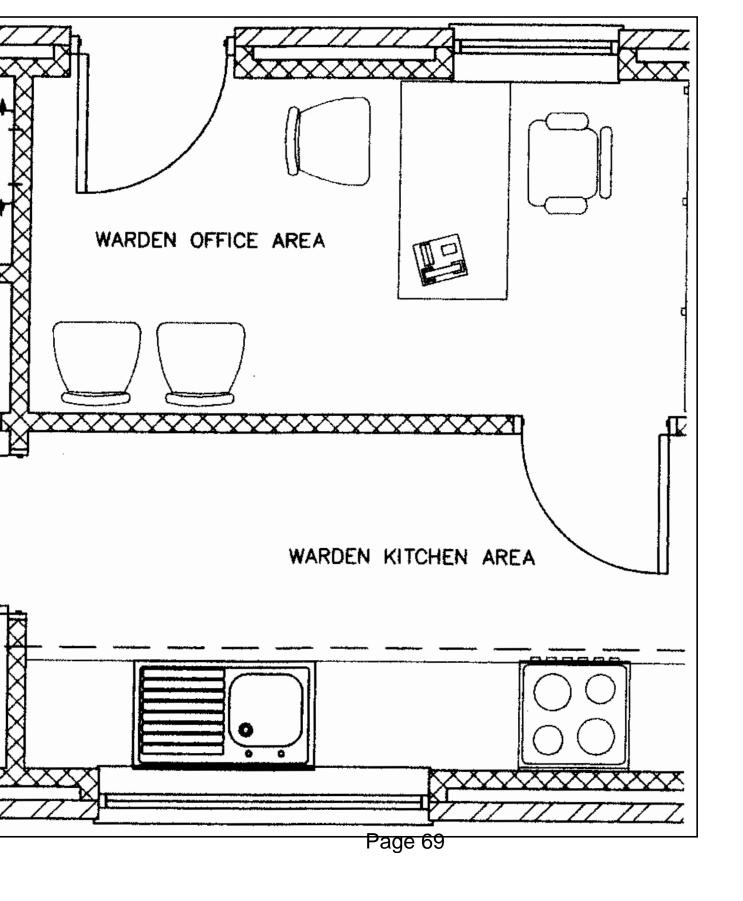


Annex B.6 Pair of amenity buildings – permanent site (see para 7.19)

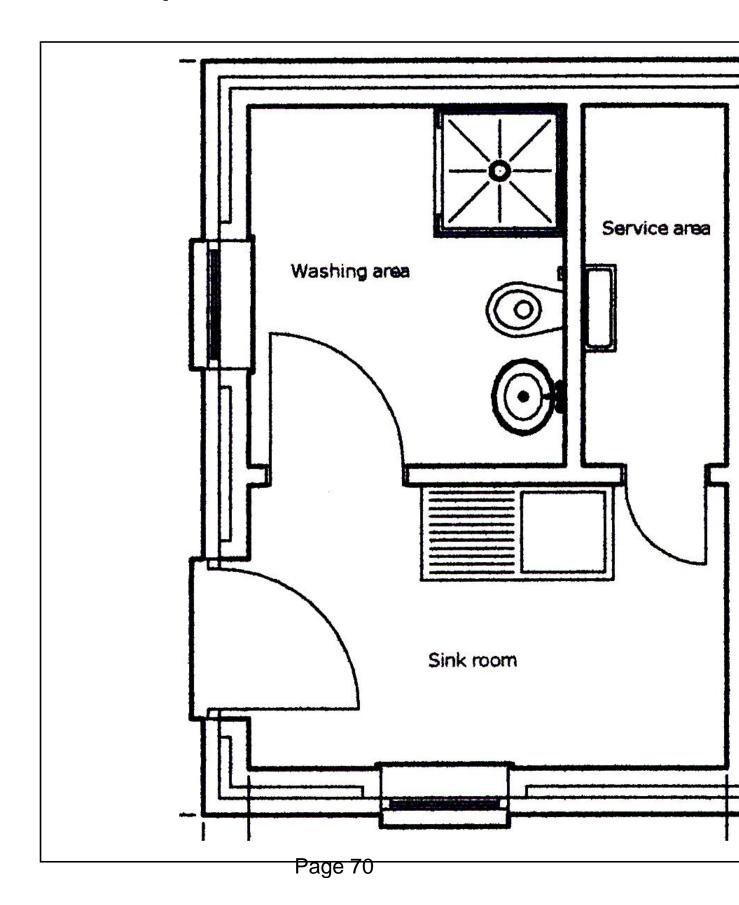


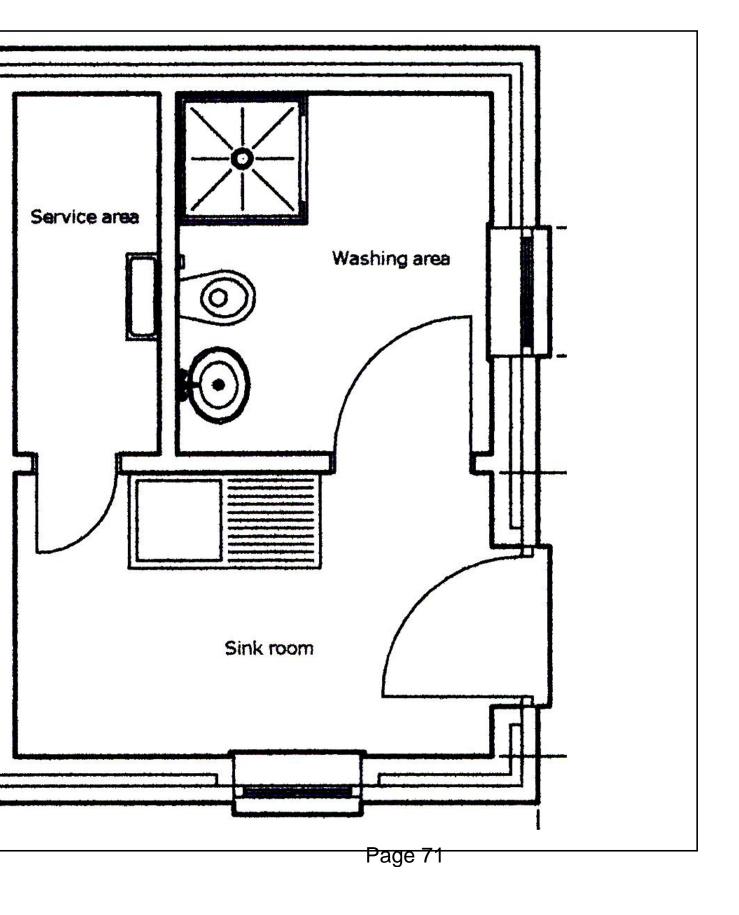
Annex B.7 Resident warden's office and accommodation – transit site (see para 8.15)





Annex B.8 Pair of amenity buildings – transit site (see para 8.29)







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INTERIM SUSTAINABILITY APPRAISAL REPORT

MARCH 2014

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GYPSY AND TRAVELLER PLAN SITE OPTIONS CONSULTATION

INTERIM SUSTAINABILITY APPRAISAL REPORT

MARCH 2014

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1 INTRODUCTION

Local Development Framework Background

- 1.1 Sevenoaks District Council is currently preparing its Local Development Framework (LDF), which will replace the Sevenoaks District Local Plan. The LDF will comprise of three Development Plan Documents (DPDs), the adopted Core Strategy, the emerging Allocations and Development Management Plan and the Gypsy and Traveller Plan.
- 1.2 The objective of the Gypsy and Traveller Plan is to identify new site allocations for Gypsy and Traveller pitches.

Sustainability Appraisal

- 1.3 Under the Planning and Compulsory Purchase Act 2004, DPDs must undergo a Sustainability Appraisal (SA). Sustainability Appraisal involves the identification and evaluation of the DPDs impacts on the three elements of sustainable development those being the economic, social and environmental impacts. The SA process incorporates the requirements of European Law on the environmental assessment of plans (referred to as the 'Strategic Environmental Assessment Directive').
- 1.4 In 2005 Consultants Scott Wilson (who have since become part of URS) carried out a Sustainability Appraisal Scoping Report (SA Scoping Report) on the LDF that covered the key DPDs proposed at the time, including the issues surrounding the Core Strategy. The report was updated in 2007 as the Core Strategy progressed through the production process.
- 1.5 Upon completion of the Core Strategy the Council undertook a further update of the Scoping Report in May 2011 in order to ensure that the Allocations and Development Management Plan and Gypsy and Traveller Plan were built upon credible baseline data. At the end of the process there were no consequential changes to the 2005 SA objectives, which remain a relevant set of criteria for judging sustainability impacts.
- 1.6 Through the scoping process a series of key sustainability objectives were produced for the District which highlighted some of the particular sustainability priorities that the LDF should seek to address and the monitors and targets by which they would be assessed.

This Document

1.7 The purpose of this document is to provide an interim assessment of the sustainability issues with regard to the potential Gypsy and Traveller pitch site allocations. The document tests the

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potential sites against the sustainability objectives identified through the scoping stage, with the

goal of ensuring that the environmental quality and local distinctiveness of the Sevenoaks

District is maintained.

1.8 A detailed appraisal of the potential sites has been undertaken in order to inform the site

selection process.

1.9 A public consultation will take place between xxx and xxx on the Gypsy and Traveller site options

and the SA Report.

1.10 Following these consultations a publication version of the Gypsy and Traveller Plan will be

prepared drawing on representations received.

1.11 The publication version of the Plan will be accompanied by a full SA Report, which will be

supported by documentation to demonstrate how the proposed sites options were selected and

mitigation measures identified from the SA.

Should you wish to comment on this SA Report, please do so in writing no later than xxx.

Write to:

The Planning Policy Team

Sevenoaks District Council

Council Offices

Argyle Road

Sevenoaks

Kent

TN13 1HG

E-mail: Idf.consultation@sevenoaks.gov.uk

2 SUSTAINABILITY APPRAISAL / SEA DIRECTIVE

- 2.1 By law, DPDs are subject to Strategic Environmental Assessment (SEA) and SA. SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive entered into force in the UK on 21 July 2004 and applies to a range of plans and programmes including LDFs.
- 2.2 SA extends the concept of SEA fully to encompass economic and social concerns. Under the Planning and Compulsory Purchase Act 2004 (PCPA), SA should be undertaken for the constituent DPDs of the LDF. SA is therefore a statutory requirement for LDFs along with SEA. The Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects. To this end, the Department for Communities and Local Government (CLG) Plan Making Manuel provides detailed guidance as to the approach to be taken to SA and SEA. The combined SEA/SA process is referred to in this document as SA.
- 2.3 The Guidance advocates a five-stage approach to undertaking SA (see below).

Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which each DPD can be assessed – together with the evidence base that will help to inform the appraisal.

The subsequent stages of the SA process involve the main body of appraisal work including developing and refining options and assessing the effects.

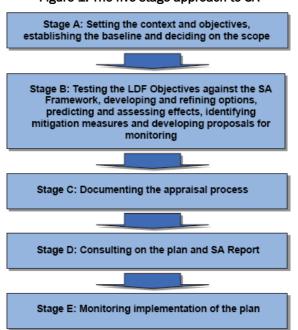


Figure 1: The five stage approach to SA

Sevenoaks Sustainability Objectives

- 2.4 The purpose of the SA, according to the SEA Directive, is to undertake an appraisal of the 'social, environmental and economic effects of plans, strategies and policies' from the outset of the LDF process, so that decisions can be made which accord with the objectives of sustainable development.
- 2.5 The Government's objectives for sustainable development are set out in the revised strategy document entitled 'Securing the Future UK Government Sustainable Development Strategy' (Defra, 2005).
- 2.6 The five guiding principles of the strategy are identified as:-
 - Living Within Environmental Limits;
 - Ensuring a Strong, Healthy and Just Society;
 - Achieving a Sustainable Economy;
 - Promoting Good Governance; and
 - Using Sound Science Responsibly.
- 2.7 In 2005 Consultants Scott Wilson carried out a SA Scoping Report on the LDF that covered the key DPDs proposed at the time, including the issues surrounding the Core Strategy. A set of 13 key sustainability objectives were derived as a result of this scoping exercise. Following production of the SA Scoping Report Update the Council considers them to remain relevant.

Sustai	nability Objectives of the LDF derived from the Scoping Stage
1	To halp analyze that averyone has the appartunity to live in a decent, sustainably constructed
1	To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
2	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3	To improve the health and well-being of the population and reduce inequalities in health
4	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest
5	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6	To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve
7	To conserve and enhance biodiversity and geodiversity
8	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10	To create a high quality built environment
11	To promote sustainable forms of development and sustainable use of natural resources
12	To encourage high and stable levels of employment and sustain economic competitiveness
13	To improve the development and retention of skills

2.8 This SA Assessment Report therefore follows the same approach to that which was adopted with the Core Strategy and Allocations and Development Management Plan and assesses the potential gypsy and traveller sites for their compatibility with these 13 sustainability objectives, in order to evaluate whether the sites proposed are suitable.

3 METHODOLOGY

- 3.1 Scoping is the first stage of SA that is completed before production of the plan document starts. As detailed in Chapter 1, three SA Scoping Reports have been produced as part of the LDF process, which have helped develop the approach to considering the potential gypsy and traveller site allocations and fulfils a number of important roles that set the basis of SA for the process.
- 3.2 This Interim SA Report of the Gypsy and Traveller Plan Site Options assessed the extent to which the potential allocations help to achieve the relevant sustainability objectives of the wider Sevenoaks LDF as derived from scoping stage. The appraisal is based on an assessment of each site against the thirteen themes set out in the LDF Scoping Report.
- 3.3 More detailed assessment will be carried out as the Plan progresses through the stages of production.

Traffic Light Assessment

- 3.4 The Interim SA uses the process of appraising individual sites against the LDF sustainability objectives and utilised a traffic light assessment method to measure the impacts of policy proposals. The purpose of the traffic light assessment was to establish the positive and negative aspects of sustainability against the objectives of the LDF.
- 3.5 The traffic light system was preferred for assessing sites rather than risk false precision by giving a numerical sustainability rating. For example if the sites were assessed on a numerical basis rather than the traffic light system, the comparison between a score of 10 and 5 would imply that the former is twice as good as the latter, which is unlikely to be the case.
- 3.6 A guide to the traffic light approach is included overleaf.

Guide to Traffic Light Policy Assessment

++	A very positive assessment is judged to be where the allocation of the site will have a very positive impact on the sustainability objective.
+	A positive assessment is where the site allocation will have a generally positive impact on that sustainability objective but is not the most sustainable option.
0	A neutral assessment is can be where the site allocation is irrelevant to the sustainability objective or where no material impact is likely to occur. A neutral assessment may also be given where the allocation can potentially have an equal positive and negative impact resulting in an overall neutral score.
-	A negative assessment is where the allocation of the site is likely to have a negative impact on that sustainability objective. This negative impact could potentially be offset through mitigation measures.
	A very negative assessment applies where the site allocation conflicts with the sustainability objective and is unlikely to be totally offset by mitigation measures.

Assessment

- 3.7 Policies are considered against the sustainability objectives, which are supported through an extensive evidence base including documents such as the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2012 and the Strategic Housing Land Availability Assessment (SHLAA). A full list of the supporting evidence base is available on the Council's website www.sevenoaks.gov.uk.
- 3.8 All sites have been given an initial rating for each objective using the traffic light methodology as detailed above. The appraisal of each site will inform the future site selection process. Where sites are judged to receive a negative impact the SA will assist in identifying mitigation measures.

4 SITE ASSESSMENT OVERVIEW

4.1 Taking into consideration the methodology described, the following matrix sets out the initial assessment and impact of the sites against there contribution and impact upon the key sustainability objectives of the LDF (as derived through the original scoping report of the SA). The detailed assessments are included at **Appendix 1**.

		Sustainability Objective											
Site	1	2	3	4	5	6	7	8	9	10	11	12	13
Eagles Farm, Crowhurst Lane, West Kingsdown (tempo permission)	orary +	0	-	+	+	-	+	+	+	0	+	0	+
Eagles Farm, Crowhurst Lane, West Kingsdown (Addition pitches)	onal +	0	-	+	+	-	0	+	+	0	0	0	+
Hollywood Gardens, School Lane, West Kingsdown	+	0	0	+	0	0	-	-		0	+	0	+
Seven Acres Farm, Hever Road, Edenbridge	+		0	+	+	0	+	-	0	0	+	0	+
Malt House Farm, Lower Road, Hextable	+	0	0	+	+	0	+	-	+	0	+	0	+
Land east of Knockholt Station, Halstead	+	-	0	+	+	0	+	+	+	0	+	0	+
Holly Mobile Home Park, Hockenden Lane, Swanley	+	0	0	+	+	0	+	0	+	0	+	0	+
Hilltop Farm, London Road, Farningham	+	0	-	+		-	-	0		0	+	0	+
Robertsons Nursery, Goldsel Road, Swanley	+	0	-	+	+	-	+	+	+	0	+	0	+
Fordwood Farm, New Street Road, Hodsoll Street	+	0	0	+		0	0	+		0	0	0	+
Land adj to Valley Park south, Lower Road, Hextable	+	-	0	+	+	-	-		+	0	0	0	+
Barnfield Park, Ash	+	-	0	+	0	-	-	-	-	0	-	0	+
Early Autumn, East Hill Road, Knatts Valley	+	-	0	+		-	-	-		0	0	0	+
Land West of Enterprise Way, Edenbridge	+ +	-	0	+	++	-	-	0	++	0	+	0	+
Land south of Mesne Way, part of Timberden Farm, Shoreham	+	-	0	+	+	-	0	-	+	0	О	О	+
Land at Fort Halstead, Halstead	+	0	0	+	-	0	-	-	-	0	+	0	+

Site	1	2	3	4	5	6	7	8	9	10	11	12	13
Hever Road Caravan Site, Edenbridge	+		0	+	+	-	0	0	+	0	0	0	+
Fort Halstead, Halstead	+	0	0	+	-	0	-	-	-	0	+	0	+
Valley Farm North, Carter's Hill, Underriver	+	-	0	+	-	-	-			0		0	+
Valley Farm South, Carter's Hill, Underriver	+	-	0	+	-	-	-			0		0	+
Land adj to Cricket Pavilion, Underriver	+	-	0	+		-	_			0		0	+
Deers Leap Farm, Four Elms Road, Edenbridge	+	-	0	+		-	-	-		0		0	+
Land South West Broom Hill, Button Street, Swanley	+	0		+	-		0	-		0	-	0	+
Polhill Park, Halstead	+	0		+			0	-		0	+	0	+
Land adj. Valley Park north, Lower Road, Hextable.	+	-	-	+	+	-	-		+	0	-	0	+

5 ASSESSMENT SUMMARY

- 5.1 All of the potential Gypsy and Traveller site allocations have been initially considered against the 13 LDF sustainability objectives, as detailed in the methodology above, and are included for reference at Appendix 1. However at this stage the appraisal process only looks at the suitability of the site for additional gypsy and traveller pitches. The exact quantity or site layout has not been considered. As the Gypsy and Traveller Plan progresses to a more advanced stage and prior to publication a more detailed appraisal will be carried out.
- 5.2 Below is a summary of how each objective was used to assess the potential allocation.
 - Objective 1 To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.
- 5.3 The NPPF requires Local Authorities to plan for Gypsy and Traveller development and allocate sites for potential pitches. The appraisal therefore considers that the allocation of sites specifically for gypsy and traveller pitches will have a positive impact on this sustainability objective.
- 5.4 All site allocations assessed have therefore scored a double positive where the site lies within the built confines of a settlement or a single positive if the site lies within the Green Belt.
 - Objective 2 To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment.
- 5.6 The site allocations consist of existing temporary pitches, additional pitches on existing gypsy and traveller sites and new sites.
- 5.7 Where sites currently have temporary pitches and where no flooding issues have been identified the site has been considered to have a neutral impact on this sustainability objective.
- 5.8 Where additional pitches are proposed on existing gypsy and traveller sites or new sites are proposed, and no flooding issues have been identified, the site has been considered to have a single negative impact on this sustainability objective. This takes into account the increased risk of surface water flooding on the site due to the loss of natural drainage.
- 5.9 Mitigation measures have been proposed where necessary.

Objective 3 - To improve the health and well-being of the population and reduce inequalities in health.

- 5.10 Sites which lie within an AQMA or AQMA buffer zone have scored negatively against this objective.
- 5.11 Sites which have potential noise issues have also scored negatively.

Objective 4 - To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest

5.12 It is considered that the allocation of permanent Gypsy and Traveller pitches will have a positive impact on reducing social exclusion within the district. All the potential allocations have scored a single positive against this objective.

Objective 5 - To improve accessibility for everyone to all services, facilities, recreational opportunities and employment.

- 5.13 This impact on the sustainability objective varies according to the location of the site.
- 5.16 Sites which lie within the built confines of a settlement have scored a double positive and those on the edge of settlements have scored a single positive.
- 5.17 Sites which are remote and can only access services and facilities by private transport have scored negatively.

Objective 6 - To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve.

- 5.18 Sites which lie within an AQMA or AQMA buffer zone have scored negatively against this objective.
- 5.19 Sites which have a temporary permission or where the site is already developed have been considered to have a neutral impact on this objective as the situation on site will remain unchanged.
- 5.20 Sites which have proposed new pitches have scored negatively as the new pitches will have associated greenhouse gas emissions.

Objective 7 - To conserve and enhance biodiversity and geodiversity.

- 5.21 Sites with temporary planning permission where the pitches are already in place and no additional pitches are proposed have been considered to have a positive impact on the conservation of biodiversity and geodiversity.
- 5.22 Sites where additional pitches are proposed on existing sites are considered to have a neutral impact and new greenfield sites to have a negative impact.
- 5.23 Sites which impact on a biodiversity designation such as a local wildlife site have scored a negative impact.
- 5.24 Mitigation measures to enhance the biodiversity and geodiversity of the site have been included.

Objective 8 - To protect, enhance and make accessible for enjoyment, the countryside and the historic environment

- 5.25 Due to the predominantly rural nature of Sevenoaks District this sustainability objective is of significant importance. Sites have been appraised against the objective by taking into account the openness of the site, the level of screening, the impact on heritage assests and whether the site lies within the Green Belt and/or AONB.
- 5.26 Sites which are well screened with no impact on heritage assets have scored positively against this objective. Sites which are very open have scored negatively.
- 5.27 Sites which will impact a heritage assets or lie within the AONB have scored negatively.
- 5.28 Mitigation measures to enhance the screening and reduce the impact on the heritage assets and the wider countryside have been included.

Objective 9 - To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure.

- 5.29 The Core Strategy encourages development in the existing built up areas to reduce the need to travel. Sites which lie within the built confines of settlements have therefore scored very positively against this objective.
- 5.30 Sites within the Green Belt, but which lie close to settlements with good public transport links have scored positively whereas sites in remote areas where private transport is required to access services have scored negatively.

Objective 10 - To create a high quality built environment

5.31 Government policy requires Local Planning Authorities to allocate land to meet the need for Gypsy and Traveller pitches within their District. Therefore site allocations for Gypsy and Traveller pitches are considered not to have an impact on this objective.

Objective 11 - To promote sustainable forms of development and sustainable use of natural resources

- 5.32 Allocations on previously developed land including sites with temporary and permanent permission for pitches score positively against this objective.
- 5.33 Greenfield sites, especially those in remote locations, score negatively.

Objective 12- To encourage high and stable levels of employment and sustain economic competitiveness

5.34 The allocation of Gypsy and Traveller pitches has no impact on the objective.

Objective 13 - To improve the development and retention of skills

5.35 Retention of gypsy and traveller pitches within the district will lead to the retention of associated skills and therefore all sites score positively.

6 APPRAISAL CONCLUSIONS & KEY RECOMMENDATIONS

- 6.1 The principal findings of the Interim SA for the Gypsy and Traveller Plan Site Options suggest that some sites are more sustainable than others.
- 6.2 Sites which are in remote rural areas have scored poorly against many objectives and therefore the appraisal considers these sites to be generally unsuitable for allocation.
- 6.3 Due to the rural nature of the District and the vast extent of Green Belt land (93% of the District) the majority of the potential allocations lie within the Green Belt and have an impact on the countryside and the natural environment. The appraisal has highlighted the importance of mitigating any negative impacts and this will be reflected in the design guidance to accompany any allocations. The consultation with external bodies will also help identify more detailed mitigation measures which could be included.
- 6.5 Taking the above into account the assessment plays an important role in identifying which sites are suitable for gypsy and traveller pitch allocation.

Recommendations

6.6 The appraisal has revealed a number of recommendations for the emerging Gypsy and Traveller Plan.

The design guidance which will accompany the site allocations must include mitigation measures to offset the negative impact that the allocation will have on the sustainability objectives. If this impact cannot be offset, the sites should only be allocated where other material considerations deem it suitable. This is only expected to be the case for a minority of sites.

Sites which lie within or close to built confines, outside of an AQMA or buffer and which do not lie within a floodplain are considered the most sustainable and should be allocated in favour of other sites.

6.9 All of the above will be considered along with consultation responses received and will inform the development of the plan.

APPENDIX 1

DETAILED POLICY APPRAISALS

Eagles Farm, Crowhurst Lane, West Kingsdown (Temporary Permission)

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	Does not lie in a floodplain, temporary permission with existing hardstanding.	
3. To improve the health and well-being of the population and reduce inequalities in health	-	Lies within an AQMA buffer zone	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Lies outside of the built confines but within walking distance to West Kingsdown Village Centre.	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	Lies within an AQMA buffer zone	
7. To conserve and enhance biodiversity and geodiversity	+	No national or local nature conservation designations, existing temporary permission so situation on site remains unchanged.	Opportunities for biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	No impact on heritage assets. Lies within the Green Belt, Pitches are not readily visible from public vantage points.	Opportunities for soft landscaping to increase screening and reduce impact.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Lies outside of the built confines but within walking distance to West Kingsdown village centre and good public transport routes.	Opportunities for improved transport links
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources	+	Re-use of existing site	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Eagles Farm, Crowhurst Lane, West Kingsdown (Additional Pitches)

SA Objective	Score	Predicted effect and justification	Mitigation
To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	Does not lie in a floodplain, existing site with hardstanding	
3. To improve the health and well-being of the population and reduce inequalities in health	-	Lies within an AQMA buffer zone	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Lies outside of the built confines but within walking distance to West Kingsdown Village Centre.	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	Lies within an AQMA buffer zone	
7. To conserve and enhance biodiversity and geodiversity	0	No national or local nature conservation designations. Additional pitches on existing site.	Opportunities for biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	No impact on heritage assets. Lies within the Green Belt, Pitches are not readily visible from public vantage points.	Opportunities for improved soft landscaping to increase screening and reduce impact
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Lies outside of the built confines but within walking distance to West Kingsdown village centre and good public transport routes.	Opportunities for improved transport links
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources	0	Additional pitches on existing site	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Hollywood Gardens, School Lane, West Kingsdown

	SA Objective	Score	Predicted effect and justification	Mitigation
	o help ensure that everyone has the opportunity to	+	Lies within the Green Belt	
	in a decent, sustainably constructed and ordable home			
	o reduce and manage the risk of flooding and any	0	Does not lie in a floodplain, temporary permission with	
	ulting detriment to public well-being, the economy		existing hardstanding.	
	the environment			
	o improve the health and well-being of the	0	No significant noise or air quality issues	
	ulation and reduce inequalities in health		The all sections of a second section and the section is	
	o reduce poverty and social exclusion and close the	+	The allocation of permanent gypsy and traveller pitches is	
gap	between the most deprived areas and the rest		considered to have a positive impact on reducing social exclusion.	
5. T	o improve accessibility for everyone to all services,	-	Lies within a rural location but close to existing residential	
	lities, recreational opportunities and employment		development	
Q 6.To	reduce air pollution (including greenhouse gas	0	Does not lie within an AQMA or buffer zone and is an existing	
,	ssions) and ensure air quality continues to improve		temporary site.	
	o conserve and enhance biodiversity and	-	Adjacent to a Local Wildlife Site and within the Kent Downs	Opportunities for
	diversity		AONB. Temporary pitches already exist	biodiversity enhancement
.	o protect, enhance and make accessible for	-	Approx. 50m from a listed building, opposite ancient	Opportunities for
	byment, the countryside and the historic ironment		woodland. Existing screening.	improved screening to reduce impact on
CITVI	nonnent			countryside and listed
				building
9. T	o reduce the need to travel, encourage alternatives		Lies in a rural lane with no public transport links. Rural lane	Opportunities for
	ne car, and make the best use of existing transport		is not suitable for pedestrians.	improved transport links
	astructure			
	To create a high quality built environment	0	No impact	
	To promote sustainable forms of development and	+	Re-use of existing site	
	tainable use of natural resources To encourage high and stable levels of employment	0	No impact	
	sustain economic competitiveness	0	NO IMPAGE 	
	To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with	
			associated skills.	

Seven Acres Farm, Hever Road, Edenbridge

SA Objective	Score	Predicted effect and justification	Mitigation
To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment		The site lies within Flood Zone 3b (functional floodplain). Temporary permission with existing hardstanding.	Opportunities exist to mitigate drainage issues through sustainable measures
3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Lies outside of the built confines but close to Edenbridge Town Centre.	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0	Does not lie within an AQMA or buffer zone and is an existing temporary site.	
7. To conserve and enhance biodiversity and geodiversity	+	No national or local nature conservation designations, existing temporary permission so situation on site remains unchanged.	Opportunities for biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-	No impact on heritage assets. Lies within the Green Belt. Site is relatively prominent in landscape with	Opportunities for improved soft landscaping to increase screening and reduce impact.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	0	Lies outside of the built confines but close to Edenbridge Town Centre but only accessible by road. No footpath.	Opportunities for improved transport links
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources	+	Re-use of existing site	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

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Malt House Farm, Lower Road, Hextable

	SA Objective	Score	Predicted effect and justification	Mitigation
	1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and	+	Lies within the Green Belt	
	affordable home			
	2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	Does not lie in a floodplain, temporary permission with existing hardstanding.	
	To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
	4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
	5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Lies outside of the built confines but facilities at Hextable within walking distance.	
P	6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0	Does not lie within an AQMA or buffer zone and is an existing temporary site.	
age	7. To conserve and enhance biodiversity and geodiversity	+	No national or local nature conservation designations, existing temporary permission	Opportunities for biodiversity enhancement.
95	8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-	No impact on heritage assets. Lies within the Green Belt. Mobile Home is set back and well integrated into existing farm, but can be seen from public footpath	Opportunities for improved soft landscaping to increase screening and reduce impact.
	9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Lies outside of the built confines but facilities at Hextable within walking distance.	Opportunities for improved transport links
	10. To create a high quality built environment	0	No impact	
	11 To promote sustainable forms of development and sustainable use of natural resources	+	Re-use of existing site	
	12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
	13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Land East of Knockholt Station, Halstead

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	-	Partly in a floodplain, but EA have advised that site is at low risk of flooding.	Sustainable drainage systems
3. To improve the health and well-being of the population and reduce inequalities in health	0	Although close to railway line no significant noise or air quality issues	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Lies outside of the built confines but close to facilities at Badgers Mount which has excellent bus links.	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	0	Does not lie within an AQMA or buffer zone and is an existing temporary site.	
7. To conserve and enhance biodiversity and geodiversity	+	No national or local nature conservation designations, existing temporary permission so situation on site remains unchanged.	Opportunities for biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	+	No impact on heritage assets. Lies within the Green Belt. Site not prominent from the street.	Opportunities for improved soft landscaping to increase screening.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Lies outside of the built confines but close to facilities at Badgers Mount which has excellent bus links.	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources	+	Re-use of existing site	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Holly Mobile Home Park, Hockenden Lane, Swanley

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to	+	Lies within the Green Belt	
live in a decent, sustainably constructed and			
	0	i i i i i i i i i i i i i i i i i i i	
		existing hardstanding.	
	0	No significant noise or air quality issues	
• •			
	+		
gap between the most deprived areas and the rest		· · · · · · · · · · · · · · · · · · ·	
	+		
		·	
. , ,	0	,	
		·	
•	+		Opportunities for
geodiversity			biodiversity enhancement.
·	0	, ·	Opportunities for
		Soft landscaping acting as screening.	improved soft landscaping
			to increase screening.
	+		
		services and public transport routes	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and	+	Re-use of existing site	
sustainable use of natural resources		-	
12. To encourage high and stable levels of employment	0	No impact	
and sustain economic competitiveness			
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with	
•		associated skills.	
	 To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment To improve the health and well-being of the population and reduce inequalities in health To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest To improve accessibility for everyone to all services, facilities, recreational opportunities and employment To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve To conserve and enhance biodiversity and geodiversity To protect, enhance and make accessible for enjoyment, the countryside and the historic environment To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure To create a high quality built environment To promote sustainable forms of development and sustainable use of natural resources To encourage high and stable levels of employment and sustain economic competitiveness 	1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home 2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment 3. To improve the health and well-being of the population and reduce inequalities in health 4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest 5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment 6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve 7. To conserve and enhance biodiversity and geodiversity 8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment 9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure 10. To create a high quality built environment 0 11 To promote sustainable forms of development and sustainable use of natural resources 12. To encourage high and stable levels of employment and sustain economic competitiveness	1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home 2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment 3. To improve the health and well-being of the population and reduce inequalities in health 4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest 5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment 6. To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve to generate and make accessible for enjoyment, the countryside and the historic environment 8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment to public variety and sustain economic competitiveness 12. To encourage high and stable levels of employment and sustain acconomic competitiveness 13. To improve the development and results of the public variety and sustain economic competitiveness + Lies outside of built confines but well connected to local services and public transport routes - Lies outside of built confines but well connected to local services and public transport routes - No impact on heritage assets. Lies within the Green Belt. - Soft landscaping acting as screening. - No impact - No impact - No impact - Re-use of existing site - Re-use of existing site - Result in a floodplain, temporary permission with existing hardstanding. - No significant noise or air quality issues - No signif

Hilltop Farm, Lower Road, Hextable

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	-
2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	0	Does not lie in a floodplain, temporary permission with existing hardstanding.	
3. To improve the health and well-being of the population and reduce inequalities in health	-	Lies within an AQMA buffer zone	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment		Lies in a remote location away from local services and facilities.	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	Lies within an AQMA buffer zone	
7. To conserve and enhance biodiversity and geodiversity	-	Lies within the Kent Downs AONB.	Opportunities for biodiversity enhancement and conservation of AONB landscape character
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	0	No impact on heritage assets. Lies within the Green Belt. Some existing screening.	Opportunities for improved soft landscaping to increase screening.
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure		Lies in a remote location away from local services and facilities with no public transport facilities.	Opportunities for improved public transport provision.
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources	+	Re-use of existing site	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Robertsons Nursery, Goldsel Road, Swanley

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to	+	Lies within the Green Belt	
live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any	0	Does not lie in a floodplain, temporary permission with	
resulting detriment to public well-being, the economy		existing hardstanding.	
and the environment		Live This are AOMA I. (for each	
3. To improve the health and well-being of the	-	Lies within an AQMA buffer zone	
population and reduce inequalities in health		The ellegation of norman and dynau and travaller nitches is	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social	
gap between the most deprived areas and the rest		exclusion.	
5. To improve accessibility for everyone to all services,	+	Lies outside of the built confines but close to facilities at	
facilities, recreational opportunities and employment	·	Crockenhill.	
6.To reduce air pollution (including greenhouse gas	_	Lies within an AQMA buffer zone	
emissions) and ensure air quality continues to improve			
7. To conserve and enhance biodiversity and	+	No national or local nature conservation designations,	Opportunities for
geodiversity		existing temporary permission so situation on site remains	biodiversity enhancement.
8 To protect, enhance and make accessible for		unchanged.	
C. To proceed, ermanes and make accession for	+	No impact on heritage assets. Lies within the Green Belt. Site	Opportunities for
enjoyment, the countryside and the historic		is well screened and located on lower lying land than the	improved soft landscaping
environment		adjacent main road.	to increase screening.
9. To reduce the need to travel, encourage alternatives	+	Close to facilities at Crockenhill which is served by a bus.	
to the car, and make the best use of existing transport		Close to Swanley with additional bus and train links. Good	
infrastructure	_	pedestrian access.	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and	+	Re-use of existing site	
sustainable use of natural resources			
12. To encourage high and stable levels of employment	0	No impact	
and sustain economic competitiveness		·	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with	
		associated skills.	

Fordwood Farm, New Street Road, Hodsoll Street

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and	+	Lies within the Green Belt	
affordable home			
2. To reduce and manage the risk of flooding and any	0	Does not lie in a floodplain, had previous temporary	
resulting detriment to public well-being, the economy and the environment		permission with existing hardstanding.	
3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
4. To reduce poverty and social exclusion and close the	+	The allocation of permanent gypsy and traveller pitches is	
gap between the most deprived areas and the rest		considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services,		Remote location approx. 1.8miles from New Ash Green which	
facilities, recreational opportunities and employment		has limited facilities.	
6.To reduce air pollution (including greenhouse gas	0	Does not lie within an AQMA or buffer zone and is an existing	
emissions) and ensure air quality continues to improve		temporary site.	
7. To conserve and enhance biodiversity and	0	No national or local nature conservation designations. Site	Opportunities for
geodiversity		has had temporary permission previously.	biodiversity enhancement.
8. To protect, enhance and make accessible for	+	No impact on heritage assets. Lies within the Green Belt. Site	Opportunities for
enjoyment, the countryside and the historic environment		is well screened.	improved soft landscaping to increase screening.
9. To reduce the need to travel, encourage alternatives		Remote location, no pavements or PROW. No public	
to the car, and make the best use of existing transport		transport.	
infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and	0	Site with previous temporary permission but in remote	
sustainable use of natural resources		location	
12. To encourage high and stable levels of employment	0	No impact	
and sustain economic competitiveness			
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with	
		associated skills.	

Land adj. Valley Park South, Lower Road, Hextable

	SA Objective	Score	Predicted effect and justification	Mitigation
_	1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Lies within the Green Belt	
	2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	-	Does not lie in a floodplain. Greenfield site, any development would increase surface water runoff	Sustainable Drainage Systems and good layout design
	3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
	4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
	5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	+	Site is considered to be well connected to Hextable within walking distance of local services.	
Dar	6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	1	Does not lie within an AQMA but is a new site which will have associated greenhouse gas emissions.	
ΩD 1	7. To conserve and enhance biodiversity and geodiversity	-	No national or local nature conservation designations but currently greenfield.	Opportunities for biodiversity enhancement.
01	8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	-	No impact on heritage assets. Lies within the Green Belt. Site is currently empty and very open, additional pitches will have a negative impact on the countryside.	Opportunities for improved soft landscaping to increase screening.
	9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	+	Site is considered to be well connected to Hextable within walking distance of local services and public transport	
	10. To create a high quality built environment	0	No impact	
	11 To promote sustainable forms of development and sustainable use of natural resources	0	New pitches on greenfield site, however close to existing pitches and local facilities. Hextable is a "Service Village".	
	12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
	13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Barnfield Park, Ash

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and	+	Lies within the Green Belt	
affordable home			
2. To reduce and manage the risk of flooding and any	-	Does not lie in a floodplain. Greenfield site, any development	Sustainable Drainage
resulting detriment to public well-being, the economy and the environment		would increase surface water runoff	Systems and good layout design
3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
4. To reduce poverty and social exclusion and close the	+	The allocation of permanent gypsy and traveller pitches is	
gap between the most deprived areas and the rest		considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services,	0	Site is considered to be reasonably connected to local	
facilities, recreational opportunities and employment		services in Ash.	
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but is a new site which will have	
emissions) and ensure air quality continues to improve		associated greenhouse gas emissions.	
7. To conserve and enhance biodiversity and	-	No national or local nature conservation designations but	Opportunities for
geodiversity		currently greenfield.	biodiversity enhancement.
8. To protect, enhance and make accessible for	-	No impact on heritage assets. Lies within the Green Belt. Site	Opportunities for
enjoyment, the countryside and the historic		has some screening, additional pitches may have a negative	improved soft landscaping
environment		impact on the countryside.	to increase screening.
9. To reduce the need to travel, encourage alternatives	-	Site is considered to be reasonably connected to Ash but	
to the car, and make the best use of existing transport infrastructure		would rely on private transport.	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and	-	New pitches on greenfield site, however close to existing	
sustainable use of natural resources		pitches and limited local facilities. Ash is a "Hamlet"	
12. To encourage high and stable levels of employment	0	No impact	
and sustain economic competitiveness			
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Early Autumn, East Hill Road, Knatts Valley

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to	+	Lies within the Green Belt	
live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any	-	Does not lie in a floodplain. Greenfield site, any development	Sustainable Drainage
resulting detriment to public well-being, the economy		would increase surface water runoff	Systems and good layout
and the environment			design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and close the	+	The allocation of permanent gypsy and traveller pitches is	
gap between the most deprived areas and the rest		considered to have a positive impact on reducing social	
		exclusion.	
5. To improve accessibility for everyone to all services,		Remote location, not close to any local facilities.	
facilities, recreational opportunities and employment			
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but new pitches will have	
emissions) and ensure air quality continues to improve		associated greenhouse gas emissions.	
7. To conserve and enhance biodiversity and	-	No national or local nature conservation designations but	Opportunities for
geodiversity		currently greenfield.	biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic	-	Lies within the Green Belt. Existing site. Adjacent to ancient	Opportunities for
enjoyment, the countryside and the historic		woodland	improved soft landscaping
environment			to increase screening.
			Mitigate impact on ancient
			woodland through careful
			design and site layout.
9. To reduce the need to travel, encourage alternatives		Site is remote and is only accessible by private transport.	
to the car, and make the best use of existing transport			
infrastructure			
10. To create a high quality built environment	0	No impact	
		N. S. I. S. I. S. S.	
11 To promote sustainable forms of development and	0	New pitches on existing site.	
sustainable use of natural resources			
12. To encourage high and stable levels of employment	0	No impact	
and sustain economic competitiveness			
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with	
		associated skills.	

Land west of Enterprise Way, Edenbridge

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to	++	Lies within the built confines of Edenbridge	
live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any	-	Small section of the site lies within a floodplain. Greenfield	Sustainable Drainage
resulting detriment to public well-being, the economy		site, any development would increase surface water runoff	Systems and good layout
and the environment			design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all services,	++	Within the built confines of Edenbridge which is the third	
facilities, recreational opportunities and employment		largest town in the District.	
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but new pitches will have	
emissions) and ensure air quality continues to		associated greenhouse gas emissions.	
improve			
7. To conserve and enhance biodiversity and	-	No national or local nature conservation designations but	Opportunities for
geodiversity		currently greenfield.	biodiversity enhancement.
8. To protect, enhance and make accessible for	0	No impact on heritage assets. New site adjacent to the Green	Opportunities for
enjoyment, the countryside and the historic		Belt. Site adjacent to existing industrial buildings.	improved soft landscaping
environment			to increase screening.
9. To reduce the need to travel, encourage	++	Within the built confines of Edenbridge which is the third	
alternatives to the car, and make the best use of		largest town in the District.	
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and	+	Although the site is greenfield it lies within the built confines of	
sustainable use of natural resources		Edenbridge.	
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Land at Fort Halstead, Halstead

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the	+	Site lies within the Green Belt	
opportunity to live in a decent, sustainably			
constructed and affordable home			
2. To reduce and manage the risk of flooding and	0	Site does not lie within a floodplain. Site partly	Sustainable Drainage Systems and
any resulting detriment to public well-being, the		developed.	good layout design
economy and the environment			
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and	+	The allocation of permanent gypsy and traveller	
close the gap between the most deprived areas		pitches is considered to have a positive impact on	
and the rest		reducing social exclusion.	
5. To improve accessibility for everyone to all	-	Remote location with limited facilities	
services, facilities, recreational opportunities and			
employment			
6.To reduce air pollution (including greenhouse	0	Does not lie within an AQMA. Site partly developed.	
gas emissions) and ensure air quality continues			
to improve			
7. To conserve and enhance biodiversity and	-	Site lies within the Kent Downs AONB, adjacent to	Opportunities for biodiversity
geodiversity.		ancient woodland, and includes some TPOs.	enhancement.
8. To protect, enhance and make accessible for	-	Site lies within the Kent Downs AONB, adjacent to	Opportunities for improvements to
enjoyment, the countryside and the historic		ancient woodland and adjacent to an ancient	increase screening and reduce impact
environment		monument. Some screening.	on heritage assets.
9. To reduce the need to travel, encourage	-	Remote location with poor public transport links	
alternatives to the car, and make the best use of			
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of	+	Re-use of existing site.	
development and sustainable use of natural			
resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic			
competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within	
skills		district with associated skills.	

Hever Road Caravan Site, Edenbridge

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Site lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any		The site lies within Flood Zone 3b (functional floodplain).	Sustainable Drainage
resulting detriment to public well-being, the economy		Existing permanent site with hardstanding.	Systems and good layout
and the environment			design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all	+	Close to local facilities in Edenbridge.	
services, facilities, recreational opportunities and			
employment			
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but new pitches will have	
emissions) and ensure air quality continues to		associated greenhouse gas emissions.	
improve			
7. To conserve and enhance biodiversity and	0	No national or local nature conservation designations.	Opportunities for
geodiversity		Additional pitches on existing site.	biodiversity enhancement.
8. To protect, enhance and make accessible for	0	No impact on heritage assets. New site adjacent to the	Opportunities for
enjoyment, the countryside and the historic		Green Belt. Site adjacent to existing industrial buildings.	improved soft landscaping
environment			to increase screening.
9. To reduce the need to travel, encourage	+	Close to local facilities in Edenbridge.	
alternatives to the car, and make the best use of			
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development	0	New pitches on existing green belt site.	
and sustainable use of natural resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Fort Halstead, Halstead

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the	+	Site lies within the Green Belt	
opportunity to live in a decent, sustainably			
constructed and affordable home			
2. To reduce and manage the risk of flooding and	0	Site does not lie within a floodplain. Existing site	Sustainable Drainage Systems and
any resulting detriment to public well-being, the		with hardstanding.	good layout design
economy and the environment			
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and	+	The allocation of permanent gypsy and traveller	
close the gap between the most deprived areas		pitches is considered to have a positive impact on	
and the rest		reducing social exclusion.	
5. To improve accessibility for everyone to all	-	Remote location with limited facilities	
services, facilities, recreational opportunities and			
employment			
6.To reduce air pollution (including greenhouse	0	Does not lie within an AQMA. Existing site.	
gas emissions) and ensure air quality continues			
to improve			
7. To conserve and enhance biodiversity and	-	Site lies within the Kent Downs AONB, adjacent to	Opportunities for biodiversity
geodiversity.		ancient woodland and includes some TPOs.	enhancement.
8. To protect, enhance and make accessible for	-	Site lies within the Kent Downs AONB, adjacent to	Opportunities for improvements to
enjoyment, the countryside and the historic		ancient woodland and surrounds an ancient	increase screening and reduce impact
environment		monument.	on heritage assets.
9. To reduce the need to travel, encourage	-	Remote location with poor public transport links	
alternatives to the car, and make the best use of			
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of	+	Re-use of existing site.	
development and sustainable use of natural			
resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic			
competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within	
skills		district with associated skills.	

Valley Farm North, Carter's Hill, Underriver

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Site lies within the Green Belt	
To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	-	Site does not lie within a floodplain. No existing buildings on site.	Sustainable Drainage Systems and good layout design
3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment 6. To reduce air pollution (including greenhouse gas	-	Remote location with limited facilities	
6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	Does not lie within an AQMA but new pitches will have associated greenhouse gas emissions.	
7. To conserve and enhance biodiversity and geodiversity.	-	Site lies within the Kent Downs AONB and is a new site with no existing development.	Opportunities for biodiversity enhancement.
8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment		Site lies within the Kent Downs AONB and within close proximity to a listed building. The site also lies within the Green Belt although it is among other buildings.	Opportunities for improvements to increase screening and reduce impact on heritage assets
9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure		Remote location with no public transport links	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development and sustainable use of natural resources		A new site in a remote location	
12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Valley Farm South, Carter's Hill, Underriver

	SA Objective	Score	Predicted effect and justification	Mitigation
	1. To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	+	Site lies within the Green Belt	
	2. To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	-	Site does not lie within a floodplain. No existing buildings on site.	Sustainable Drainage Systems and good layout design
	3. To improve the health and well-being of the population and reduce inequalities in health	0	No significant noise or air quality issues	
	4. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	+	The allocation of permanent gypsy and traveller pitches is considered to have a positive impact on reducing social exclusion.	
	5. To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	-	Remote location with limited facilities	
פ	6.To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	-	Does not lie within an AQMA but new pitches will have associated greenhouse gas emissions.	
_	7. To conserve and enhance biodiversity and geodiversity.	-	Site lies within the Kent Downs AONB and is a new site with no existing development.	Opportunities for biodiversity enhancement.
٥	8. To protect, enhance and make accessible for enjoyment, the countryside and the historic environment		Site lies within the Kent Downs AONB and within close proximity to listed buildings. The site also lies within the Green Belt and is very open in the landscape with no screening.	Opportunities for improvements to increase screening and reduce impact on heritage assets
	9. To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure		Remote location with no public transport links	
	10. To create a high quality built environment	0	No impact	
	11 To promote sustainable forms of development and sustainable use of natural resources		A new site in a remote location	
	12. To encourage high and stable levels of employment and sustain economic competitiveness	0	No impact	
	13. To improve the development and retention of skills	+	Retention of gypsy and traveller pitches within district with associated skills.	

Land adj. Cricket Pavilion, Underriver

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Site lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home		Oho daga wat lia within a flandalain. Ownerfield aits	Custoinalda Dusinaga
2. To reduce and manage the risk of flooding and any	-	Site does not lie within a floodplain. Greenfield site.	Sustainable Drainage
resulting detriment to public well-being, the economy and the environment			Systems and good layout design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	design
population and reduce inequalities in health	U	The significant floise of all quality issues	
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all		Very remote location	
services, facilities, recreational opportunities and			
employment			
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but new pitches will have	
emissions) and ensure air quality continues to		associated greenhouse gas emissions.	
improve			
7. To conserve and enhance biodiversity and		Site lies within the Kent Downs AONB and is a new site with	Opportunities for
geodiversity.		no existing development.	biodiversity enhancement.
8. To protect, enhance and make accessible for		Site lies within the Kent Downs AONB and within close	Opportunities for
enjoyment, the countryside and the historic		proximity to listed buildings. The site also lies within the	improvements to increase
environment		Green Belt and is very open in the landscape with no	screening and reduce impact on heritage assets
9. To reduce the need to travel, encourage		screening. Remote location with no public transport links	impact on heritage assets
alternatives to the car, and make the best use of		Remote location with no public transport links	
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development		A new site in a remote location. Underriver is a Hamlet	
and sustainable use of natural resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Deers Leap Farm, Four Elms Road, Edenbridge

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Site lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home		Other Land and Park Thirty of the Land and All Control of the Cont	
2. To reduce and manage the risk of flooding and any	-	Site does not lie within a floodplain. No existing buildings on	Sustainable Drainage
resulting detriment to public well-being, the economy and the environment		site.	Systems and good layout design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all		Very remote location with limited facilities	
services, facilities, recreational opportunities and			
employment		December 2012 and AOMA by Least 2014 and 2014 and	
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but new pitches will have	
emissions) and ensure air quality continues to improve		associated greenhouse gas emissions.	
improve 7. To conserve and enhance biodiversity and		Site does not have any designations however it is a site with	Opportunities for
geodiversity.		no existing development.	biodiversity enhancement.
8. To protect, enhance and make accessible for		Site does not have impact on any heritage assets. The site	Opportunities for
enjoyment, the countryside and the historic		lies within the Green Belt and is open in the landscape with	improvements to increase
environment		some screening.	screening and reduce
		come concoming.	impact on countryside.
9. To reduce the need to travel, encourage		Remote location with no public transport links	prise an estimate and
alternatives to the car, and make the best use of		' '	
existing transport infrastructure			
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development		A new site in a remote location	
and sustainable use of natural resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Land South West of Broom Hill, Swanley

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Site lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any	0	Site does not lie within a floodplain. Temporary permission in	Sustainable Drainage
resulting detriment to public well-being, the economy		place for some pitches and associated hardstanding.	Systems and good layout
and the environment			design
3. To improve the health and well-being of the		Site lies within the AQMA buffer zone alongside the M25 with	
population and reduce inequalities in health		associated noise and air quality issues.	
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all	-	Facilities in Swanley are fairly close but only accessible by	
services, facilities, recreational opportunities and		private transport.	
employment			
6.To reduce air pollution (including greenhouse gas		Lies within an AQMA buffer zone	
emissions) and ensure air quality continues to			
improve			
7. To conserve and enhance biodiversity and	0	Existing temporary permission.	Opportunities for
geodiversity.			biodiversity enhancement.
8. To protect, enhance and make accessible for	-	The site lies within the Green Belt and is very open in the	Opportunities for
enjoyment, the countryside and the historic		landscape with no screening.	improvements to increase
environment			screening and reduce
0.7			impact on the countryside
9. To reduce the need to travel, encourage		Remote location with no public transport links	
alternatives to the car, and make the best use of			
existing transport infrastructure		No increase	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development	-	Temporary site but in a rural location	
and sustainable use of natural resources			
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness			
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Polhill Park, Halstead

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Site lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and any	0	Site does not lie within a floodplain. Temporary permission in	Sustainable Drainage
resulting detriment to public well-being, the economy		place for some pitches and associated hardstanding.	Systems and good layout
and the environment			design
3. To improve the health and well-being of the		Site lies within the AQMA buffer zone alongside the motorway	
population and reduce inequalities in health		with noise and air quality issues.	
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all		Remote location not well connected to local facilities.	
services, facilities, recreational opportunities and			
employment			
6.To reduce air pollution (including greenhouse gas		Lies within an AQMA buffer zone and new pitches will have	
emissions) and ensure air quality continues to improve		associated greenhouse gas emissions.	
7. To conserve and enhance biodiversity and	0	The site lies within the Kent Downs AONB but is already	Opportunities for
geodiversity.		established.	biodiversity enhancement.
8. To protect, enhance and make accessible for	-	The site lies within the Green Belt and is screened from public	Opportunities for
enjoyment, the countryside and the historic		highway. The site lies within close proximity of ancient	improvements to increase
environment		woodland and within the Kent Downs AONB.	screening and reduce
O To made and the mond to travel an account		Demonts leasting with an explication and links	impact on heritage assets
9. To reduce the need to travel, encourage		Remote location with no public transport links	
alternatives to the car, and make the best use of			
existing transport infrastructure	0	No import	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development	+	New pitches on existing site	
and sustainable use of natural resources		No import	
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness		Detention of a year and travaller nitches within district with	
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Land South of Mesne Way, Shoreham

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and	-	Does not lie in a floodplain. Greenfield site, any development	Sustainable Drainage
any resulting detriment to public well-being, the		would increase surface water runoff	Systems and good layout
economy and the environment			design
3. To improve the health and well-being of the	0	No significant noise or air quality issues	
population and reduce inequalities in health			
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all	+	Site is considered to be well connected to Shoreham within	
services, facilities, recreational opportunities and		walking distance of local services.	
employment			
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but is a new site which will have	
emissions) and ensure air quality continues to		associated greenhouse gas emissions.	
improve			
7. To conserve and enhance biodiversity and	О	No national or local nature conservation designations.	Opportunities for
geodiversity		Greenfield but agricultural field with little biodiversity. New	biodiversity enhancement.
0.7		pitches could include measures to improve biodiversity.	
8. To protect, enhance and make accessible for	-	Lies within the Green Belt and the AONB. Site is well	Opportunities for
enjoyment, the countryside and the historic		screened from the road but can be viewed from adjoining	improved soft landscaping
environment		housing and the PROW. Site is considered to be well connected to Shoreham within	to increase screening.
9. To reduce the need to travel, encourage	+		
alternatives to the car, and make the best use of		walking distance of local services and public transport	
existing transport infrastructure 10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development	0	New pitches on greenfield site, however close to local	
and sustainable use of natural resources	0	facilities and existing development. Shoreham is a "Service	
and sustainable use of flatural resources			
12. To encourage high and stable levels of	0	Village" No impact	
employment and sustain economic competitiveness	U	ινο πηρασί	
13. To improve the development and retention of		Retention of gypsy and traveller pitches within district with	
skills	+	associated skills.	
SMIIS		מסטטנומנכע סאוווס.	

Land adj. Valley Park North, Lower Road, Hextable

SA Objective	Score	Predicted effect and justification	Mitigation
1. To help ensure that everyone has the opportunity	+	Lies within the Green Belt	
to live in a decent, sustainably constructed and			
affordable home			
2. To reduce and manage the risk of flooding and	-	Does not lie in a floodplain. Greenfield site, any	Sustainable Drainage
any resulting detriment to public well-being, the		development would increase surface water runoff	Systems and good layout
economy and the environment			design
3. To improve the health and well-being of the	-	Site lies adjacent to a busy highway with associated noise	
population and reduce inequalities in health		and air quality issues	
4. To reduce poverty and social exclusion and close	+	The allocation of permanent gypsy and traveller pitches is	
the gap between the most deprived areas and the		considered to have a positive impact on reducing social	
rest		exclusion.	
5. To improve accessibility for everyone to all	+	Site is considered to be well connected to Hextable within	
services, facilities, recreational opportunities and		walking distance of local services.	
employment		Dana wat lie within an AONAA hat in a waxaatta which will	
6.To reduce air pollution (including greenhouse gas	-	Does not lie within an AQMA but is a new site which will	
emissions) and ensure air quality continues to improve		have associated greenhouse gas emissions.	
		No national ar legal nature concernation decignations but	Opportunities for
7. To conserve and enhance biodiversity and	-	No national or local nature conservation designations but	Opportunities for biodiversity enhancement.
geodiversity 8. To protect, enhance and make accessible for		currently greenfield.	Opportunities for
enjoyment, the countryside and the historic		No impact on heritage assets. Lies within the Green Belt. Site is currently empty and very open, additional pitches will	improved soft landscaping
environment		have a negative impact on the countryside.	to increase screening.
9. To reduce the need to travel, encourage	+	Site is considered to be well connected to Hextable within	to increase screening.
alternatives to the car, and make the best use of	Т	walking distance of local services and public transport	
existing transport infrastructure		waiking distance of local services and public transport	
10. To create a high quality built environment	0	No impact	
11 To promote sustainable forms of development	-	New pitches on greenfield site, however close to existing	
and sustainable use of natural resources		pitches and local facilities.	
12. To encourage high and stable levels of	0	No impact	
employment and sustain economic competitiveness	Ü		
13. To improve the development and retention of	+	Retention of gypsy and traveller pitches within district with	
skills		associated skills.	

Details of the assessment		
Name of Function/Policy/ Service being assessed	Gypsy and Traveller Plan - Site Options Consultation	
Date of assessment	Commenced: October 2013	
	Completed: Active document – Status On-going	
Directorate & Service	Community and Planning Services, Planning Policy	
Policy Owner	Hannah Gooden	
Name of Officer(s) carrying out assessment:	Mikyla Smith	

Step 1	 Initial Screening for: New/revised policies/strategies policy decisions considering partnership working arrangements procurement/commissioning activities (For assessments identified within the Equality Impact Assessment Timetable please go straight to Step 2). 					
	Key Questions	Answers/Notes				
1	What are you looking to achieve in this activity?	To assess the Gypsy and Traveller Plan – Site Options Consultation document. Sevenoaks District Council (SDC) aim to produce a Development Plan Document (DPD) which will form part of the Local Plan and set out allocated sites for the provision of Gypsy and Traveller accommodation, to meet the District's need up until the end of the Plan period (2026). In order to produce the DPD, the Council will need to undertake various rounds of publiconsultation, the first of which will be on the Gypsy and Traveller Plan – Site Options Consultation.				
2	Who in the main will benefit?	Members of the community of the Sevenoaks District who make up the Gypsy and Traveller population, particularly those persons who wish to engage with the planning system and those who are seeking homes.				
3	Does the activity have the	Yes Please explain:				



Step 1	 Initial Screening for: New/revised policies/strategies policy decisions considering partnership working arrangements procurement/commissioning activities (For assessments identified within the Equality Impact Assessment Timetable please go straight to Step 2). 		
	Key Questions	Answers/N	Votes
	potential to cause adverse impact or discriminate against different groups in the community?	No 🔀	Please explain: The plan allocates land for future development of Gypsy and Traveller pitches to assist the Council in meeting the identified accommodation needs of the Gypsy and Traveller community up until the end of the plan period. The Local Plan currently identifies the provision for bricks and mortar housing, allocating sites across the District to meet that need. By ensuring that the needs of this minority group are fairly and equally considered by the Local Plan (in the same way as general housing and land allocations) the Council aims to prevent any discrimination against this group, via the planning process.
		Note: if the 2.	e answer is 'yes' then a full equality impact assessment is required – see step
4	Does the activity have potential to make a positive contribution to equalities?	Yes 🖂	Please explain: The plan allocates land for future development of Gypsy and Traveller pitches to assist the Council in meeting the identified accommodation needs of the Gypsy and Traveller community up until the end of the plan period. By ensuring that the needs of this minority group are fairly and equally considered by the Local Plan (in the same way as the general housing need and other land allocations) the Council aims to prevent any discrimination against this group, via the planning process. A strategy which considers provision for adequate future homes for Gypsies and Travellers will make a positive contribution to this minority group.
		No 🗌	Please explain:
		Note: if the 2.	e answer is 'yes' then a full equality impact assessment is required – see step



Where the screening has identified the need for a full impact assessment, this must:

- be commenced during the drafting stages of a new policy/strategy and fully completed following any consultation period before submitting for committee approval
- carried out before any policy decision is taken
- completed in the planning stages of any procurement exercise



	Key Questions	Answers/Notes
Step 2	Scoping the assessment	
1.	What is the overall aim, or purpose of the function/policy/service?	The Council aims to ensure that everyone, including Gypsies and Travellers, have the opportunity to access a safe and affordable home. Local authorities are required by law under the Housing Act 2004 and by national policy to assess the accommodation needs of the Gypsy and Traveller population in their area, and if need is identified, to develop a strategy to meet it.
		The Gypsy and Traveller Plan – Site Options Consultation document, is the first document to be considered as part of the on-going consultation process which will lead to the production of the Gypsy and Traveller Development Plan Document (DPD). This DPD will form part of the Local Plan and set out allocated sites for the provision of Gypsy and Traveller accommodation, to meet the District's need up until the end of the Plan period (2026).
		The DPD's preparation will be set in the context of the Core Strategy. This strategy is central to the delivery of sustainable development and the creation of sustainable communities throughout the District. The document will work alongside the rest of the Local Plan and national policy to assist in the delivery of certain strategic objectives for the future development of the area.
2.	What outcomes do you want to achieve with this function/policy/service and for whom?	Once prepared, the DPD will aim to allocate sites that have been robustly assessed and are available, suitable and deliverable throughout the plan period. The overarching aim is to increase the number of authorised Gypsy and Traveller pitches in the most appropriate locations across the District, allowing the Gypsy and Traveller community to meet their needs. The prospect of permanent pitches provides secure homes with access to services, facilities, education, healthcare, welfare and employment opportunities, which could help to reduce potential inequalities experienced by Gypsy and Traveller families or individuals. Permanent pitches may also assist to prevent any Gypsies or Travellers who are subject to continuous and 'enforced' nomadism (due to constant movement from private land by local authorities), as well as reducing the number of unauthorised sites.

	Key Questions	Answers/Notes
		Unauthorised sites are often a significant issue which have the potential to impact not only the Gypsy and Traveller population, but local authorities, landowners and the settled population. Sites occupied without permission may be situated in inappropriate locations unsuitable for accommodation and may expose the occupier to health hazards such as poor air quality, lack of waster/sewage disposal, or land contamination issues. These locations are often unsustainable, with poor transport infrastructure, lacking in access to healthcare facilities and other services and provisions. Unauthorised encampments may also damage the local environment and amenity and it is not uncommon for these sites to be a major source of tension between Gypsies and Travellers and the settled population. This can have an overall negative effect on community cohesion principles.
		At this stage, the current Site Options Consultation document sets out the planning context for the preparation of this plan, the evidence base for Gypsy and Traveller need and the identified site options (inclusive of those deemed to be unsuitable). Consultation on this document will allow the general public to comment on the objectives, site selection process and identified site options for Gypsy and Traveller accommodation.
3.	Who will be affected?	Mainly members of the community of the Sevenoaks District who make up the Gypsy and Traveller population, particularly those persons who wish to engage with the planning system and those who will be seeking accommodation during the plan period. Others affected may be those from the settled population who live in close proximity to proposed site allocations, landowners, developers and private applicants.
4.	Who defines or defined the function/service/ policy?	This document has been prepared by the Sevenoaks District Council Planning Policy Team and will be subject to continued consultation with the general public (and statutory bodies) in accordance with the adopted Statement of Community Involvement (SCI).
5.	Who implements the function/service/policy?	Sevenoaks District Council will implement the service. Other partner organisations operating within the district area, individuals and private sector companies may also have a role in implementation.

	Key Questions	Answers/Notes	
6.	How do the outcomes of the	Please indicate which of the Councils core values / promises (as set out in the	
	function/service/policy meet	Vision) these outcomes relate to:	
	or hinder other policies,	We will provide value for money	X
	values or objectives of the	We will work in partnership to keep the District of Sevenoaks safe	Χ
	public authority (if	We will continue to collect rubbish efficiently and effectively	n/a
	applicable)?	We will protect the Green Belt	Х
		We will support and develop the local economy	n/a
		Fairness	X
		Integrity	Χ
		Quality	Χ
7.	What factors could contribute or detract from the outcomes identified earlier?	Factors at play which may detract from the ability to allocate sites may include a lasuitable, available and deliverable land for pitches, general economic instability ar market fluctuations. Active participation from, and engagement with, the public (including the Gypsy and Traveller community), landowners and statutory bodies we contribute to the aims of the plan.	nd
Step 3	Consideration of data and infor	rmation	
8.	What do you already know about who uses this function/service/ policy?	There is no one source of evidence which provides definitive information about the population of Gypsies and Travellers located in the Sevenoaks District, however Tr Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2012) provided the following:	
		- The Gypsy and Travellers population in the District is estimated to be 498 processor or 0.4% of the overall population.	people,
		 Household sizes of this group are significantly larger than the settled popul at 3.4 persons per household. 	ation
		 17% of those sampled for the study (over half of the estimated population sampled) were households over 60 years of age. 	were
		- The vast majority of those sampled have lived in the District for over 10 year many of whom were born here or have strong family links to the area.	ars,

	Key Questions	Answers/Notes
		- Those sampled demonstrated a mix between those who still travelled and those who no longer travelled.
		The study has revealed that there is a need to provide between 72 and 78 pitches for the Gypsy and Traveller population across the District, up until the end of the Plan period.
9.	Has any consultation with service users already taken place on the function/service/ policy and if so what were the key findings?	The Gypsy and Traveller – Site Options Consultation is the first stage of consultation (to allow for public comment) on site options. The following engagement has taken already taken place: Calls for Sites: - January - March 2010 The Allocations (Options) Consultation included a call for sites for gypsy and traveller accommodation. - May - August 2011 The Development Management Policies Consultation included a call for sites for gypsy and traveller accommodation. - Call for Sites August 2012 involved contacting Gypsies and Travellers living in the District, Gypsy and Traveller organisations and those who registered an interest through Local Plan consultations. Parish and Town Councils were also contacted for their views on any potential sites within their areas. Meetings conducted as part of plan preparation: - SDC held a meeting with neighbouring authorities to determine other area's
		provision requirements, where they are in the plan preparation process, and how they intend or anticipate meeting any identified requirements; - discussions have been held with the KCC communications and engagement
		team, and Gypsy and Traveller Liaison Unit; and

	Key Questions	Answers/Notes
		- in-house meetings have been held with the Development Management, Enforcement, Housing, Property, and Environmental Health teams.
		Following the 2010 and 2011 Calls for Sites, the Council formally decided to allocate sites for Gypsies and Travellers through a Gypsy and Traveller Site Provision Plan rather than in the Allocations and Development Management Plan (ADMP), which is currently at examination stage.
		As a result of responses received during the various calls for sites, discussions with the local Gypsy and Traveller population, Town and Parish Councils and other interested parties, the Council has identified the sites found within the Gypsy and Traveller – Site Options Consultation document. A meeting with neighbouring authorities did not result in any expressions of interest or willingness to support SDC in the provision of our identified need.
10.	What, if any, additional information is needed to assess the impact of the function/service/policy?	The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Sevenoaks (2012), produced by the Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford, forms a key part of the evidence base for the preparation of the plan.
		The current Site Options Consultation Plan will need to undergo various rounds of consultation before it can be adopted by the Council as a DPD. During these rounds, relevant representations received on the document and any new national planning policies or guidance, will help to shape the Plan's development.
11.	How do you propose to gather the additional information?	Via subsequent rounds of consultation and analysis of the responses gained from those consultations in accordance with the Statement of Community Involvement.
Step 4	Assessing the Impact	

	Key Questi	ons	Answers/Notes		
12.	Based on what information you already know, in relation to each of the following groups consider whether a) there is anything in the function/service/policy that could discriminate or put anyone at a disadvantage b) for an existing function/service/policy, how it is actually working in practice for each group				
	N.B. As the Plan is specifically designed to set out provisions for the Gypsy and Traveller community, equalities have been assessed from the point of view of this group alone. It is not considered that the allocation of pitches acro the District for Gypsy and Traveller accommodation will have a detrimental impact on any equalities groups generally, therefore this is not discussed in the section below.				
	It is important to note that limited evidence is available on the demographic make up of the Gypsy and Traveller community in the District. It is likely that further evidence will come forward as part of continued consultation to be undertaken on the Gypsy and Traveller DPD. Equalities will therefore be re-assessed at each stage of the plan making process.				
a.	Equality groups	Age	An unstable living environment may have an effect on all age groups across the Gypsy and Traveller community, however it has the potential to have a particularly detrimental impact on young people and children. By allocating pitches in line with sustainable development principles, younger members of the community will be more likely to maintain a regular and continuing access to education. The evidence base suggests that a significant minority of the Gypsy and Traveller population are over 60, and that most come from larger than average family units that have strong connections to the Sevenoaks District. As people age they are significantly more likely to suffer with healthcare issues that require regular or ongoing treatment. By allocating pitches in line with sustainable development principles older members of the community may be more likely to have access to healthcare and welfare requirements that are specific to the older population.		

	Key Questions	Answers/Notes
b.	Disability	By ensuring adequate, suitable and sustainable accommodation persons with disability are more likely to have access to healthcare and transportation, as well as assistance from the family unit, should it be required. Road side stopping and unauthorised site occupation are likely to mean that there is a
		lack of suitable facilities for those who are considered to have a disability. Unauthorised sites are also unlikely to have the adequate access facilities required.
C.	Carers	There is no direct evidence base on which to make an assessment.
d.	Gender	There is no direct evidence base on which to make an assessment.
e.	Race	The document has been specifically prepared to consider the needs of the Gypsy and Traveller community. As noted throughout the document, the specific needs of this minority group are being considered alongside the general settled population. Pitch provision will allow for the continued stability of this community, safeguarding their ability to have a permanent safe and secure base within the Sevenoaks District – an area which the majority of the population have strong family ties to.
f.	Religion/Belief	There is no direct evidence base on which to make an assessment.
g.	Sexual Orientation	There is no direct evidence base on which to make an assessment.
h.	Marital / Civil Partnership status	There is no direct evidence base on which to make an assessment.
i.	Pregnancy and maternity	Although there is no direct evidence to make an assessment, it is anticipated that a secure and stable environment will have a more positive impact on pregnant women, allowing for access to pre and post natal healthcare and welfare facilities that are vital during and after pregnancy.
j.	Gender reassignment	There is no direct evidence base on which to make an assessment.
k.	General i.e affecting all of the above /other	The evidence base has indicated that many of the Gypsies and Travellers surveyed across the District no longer travel on a regular basis. By ensuring that permanent pitch locations are suitable and sustainable, this provides the possibility of permanent and

	Key Questions	Answers/Notes	
	e.g. socio- economic	continued access to work. This may help to stabilise family units and reduce wealth inequalities.	
Step 5	Reviewing and scrutinising the Impact		
13.	Have you identified any differential impact and does this adversely affect any groups in the community?	No	
14.	Can we make any changes?	Changes to the Plan will be made throughout its development and until it is adopted as a DPD which forms part of the Council's Local Plan.	
15.	If there is nothing you can do, can the reasons be fairly justified?	NA	
16.	Do any of the changes in relation to the adverse impact have a further adverse affect on any other group?	NA NA	

Step 5 continued Actions to be inserted into Equality Action Plans						
-	Based on your answers in Step 5, please finalise your actions here. These actions will then be incorporated into our equality action plans.					
Equality Strand	Action	Outcome/monitoring information and targets	Date for Completion	Responsible Officer		
If an adverse	impact was found or unmet ne	eds identified, which actions will you	ı put in place to a	ddress this:		
If the impact	is still unclear, list the actions y	ou will put in place to gather the inf	ormation you need	d:		
If you did not practice:	find any evidence of unmet ne	eds or adverse impact, list the action	ns you will put in p	lace to maintain good		
	To continue to consult in accordance with the SCI, on all Local Plan documents, ensuring that all residents who wish to be involved in the preparation of DPD's can express their views.	On going.	On going.	Planning Policy Team		

Step 6	p 6 Decision making and future monitoring				
	Key questions	Answers / notes			
17.	Which decision making process do these changes need to go through i.e. do they need to be approved by a committee/Council?	These changes need to proceed through the following timetable: - Agreement by cabinet to consult on the Gypsy and Traveller Plan – Site Options (10/04/14). - Consultation (May/June 2014) - Pre-submission publication (Winter 2014) - Adoption (Winter 2015)			
18.	How will you continue to monitor the impact of the function/service/ policy on diverse groups?	Through public consultation in accordance with the SCI.			
19.	When will you review this equality impact assessment?	During the next round of consultation on the Gypsy and Traveller Plan			

Final steps

For an existing function/service/policy:

- Submit the EqIA to your Departmental Management Team for approval.
- Send your assessment to the West Kent Equalities Officer for publication on the website.
- Update Covalent.

For a new function/service/ policy:

- Summarise your findings in the committee report.
- Ensure planned consultations address the findings of the impact assessment.





Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Sevenoaks

Final Report

Philip Brown, Lisa Scullion and Gareth Morris Salford Housing & Urban Studies Unit University of Salford

March 2012



About the Authors

Philip Brown and Lisa Scullion are Research Fellows and in the Salford Housing & Urban Studies Unit (SHUSU) at the University of Salford. Gareth Morris is a Research Associate within SHUSU.

The Salford Housing & Urban Studies Unit is a dedicated multi-disciplinary research and consultancy unit providing a range of services relating to housing and urban management to public and private sector clients. The Unit brings together researchers drawn from a range of disciplines including: social policy, housing management, urban geography, environmental management, psychology, social care and social work.

Study Team

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Special thanks are also due to all those who took the time to participate in the study, helped organise the fieldwork and provided invaluable information and support in the production of this report.

Particular thanks must, of course, go to the people who found the time to talk to us and answer our questions in a full, honest and patient manner. It is hoped that this report is able to accurately reflect their experiences and needs.

This report is based on research undertaken by the study team and the analysis and comment thereafter do not necessarily reflect the views and opinions of the research commissioners, or any participating stakeholders and agencies. The authors take responsibility for any inaccuracies or omissions in the report.

Agenda Item 6

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Glossary

The following terms are used in this report and or are used in conjunction with planning for Gypsy, Traveller and Showpeople accommodation. As such these terms may need some clarification. In the case of those terms which are related to Gypsy and Traveller Accommodation and culture, it is noted that a number of these terms are often contested and debated. It is not the intention of the authors to present these terms as absolute definitions; rather, the explanations provided are those the authors used in this assessment as their frames of reference.

Term	Explanation					
Amenity block/shed	On most residential Gypsy/Travellers sites these are buildings					
	where basic plumbing amenities (bath/shower, WC and sink) are					
	provided at the rate of one building per pitch.					
Authorised social site	An authorised site owned by either the local authority or a					
	Registered Housing Provider.					
Authorised Private site	An authorised site owned by a private individual (who may or may					
	not be a Gypsy or a Traveller). These sites can be owner-occupied,					
	rented or a mixture of owner-occupied and rented pitches.					
Bricks and mortar	Permanent mainstream housing.					
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred					
	to as trailers.					
Caravan Count	Bi-annual count of Gypsy and Traveller caravans conducted every					
	January and July by local authorities published by the CLG					
Chalet	In the absence of a specific definition the term 'chalet' is used here					
	to refer to single storey residential units which resemble mobile					
	homes but can be dismantled.					
Core Strategy	Key compulsory Development Plan Document in the Local					
	Development Framework which sets out principles on which other					
	Development Plan Documents are built.					
Department for Communities and	The main government department responsible for Gypsy and					
Local Government (CLG)	Traveller accommodation issues					
Development Plan Documents (DPDs)	Documents which outline the key development goals of the Local					
	Development Framework.					
Gypsy and Traveller Accommodation	The main document that identifies the accommodation					
Needs Assessment (GTAA)	requirements of Gypsies and Travellers.					
Doubling-up	To share a pitch on an authorised site.					
Gaujo/Gorger	Literal translation indicates someone who is not of the Romany					
	Gypsy race. Romany word used mainly, but not exclusively, by					
	Romany Gypsies to refer to members of the settled					
	community/non-Gypsy/Travellers.					
Green Belt	A policy or land use designation used to retain areas of largely					
	undeveloped, wild, or agricultural land surrounding or					
	neighbouring urban areas.					
Gypsy	Members of Gypsy or Traveller communities. Usually used to					
	describe Romany (English) Gypsies originating from India. This					
	term is not acceptable to all Travellers.					
Gypsies and Travellers (as used in this	Consistent with the Housing Act 2004, inclusive of: all Gypsies, Irish					
report)	Travellers, New Travellers, Show People, Circus People and Gypsies					
	and Travellers in bricks and mortar accommodation.					

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Homes and Communities Agency	National housing and regeneration agency. Has been responsible					
(HCA)	for administering the Gypsy and Traveller Site Grant since 2009/10.					
Local Plan/Local Development	A set of documents which a Local Planning Authority creates to					
Framework (LDF)	describe their strategy for development and use of land in their					
	area of authority.					
Mobile home/Mobiles	Legally classified as a caravan but not usually moveable without					
	dismantling or using a lorry.					
Pitch/plot	Area of land on a site/development generally home to one licensee					
	household. Can be varying sizes and have varying caravan					
	occupancy levels. Often also referred to as a plot, particularly in					
	relation to Travelling Showpeople. There is no agreed definition as					
	to the size of a pitch.					
Pulling-up	To park a trailer/caravan.					
Regional Spatial Strategy (RSS)	Previous planning approach across England. In July 2010 the					
	government announced its decision to revoke RSSs.					
Settled community/people	Reference to non-Travellers (those who live in houses).					
Site	An authorised area of land on which Gypsies and Travellers are					
	accommodated in trailers/chalets/					
	vehicles. Can contain one or multiple pitches.					
Static caravan	Larger caravan than the 'tourer' type. Can be moved but only with					
	the use of a large vehicle. Often referred to simply as a trailer.					
Stopping place	Locations frequented by Gypsies and Travellers, usually for short					
	periods of time.					
Suppressed/concealed household	Households, living within other households, who are unable to set					
	up separate family units and who are unable to access a place on					
	an authorised site, or obtain or afford land to develop one.					
Tourer	Term used by SDC to define a moveable caravan					
Trailer	Term commonly used by Gypsies and Travellers to refer to a					
	moveable caravan.					
Transit site	Site intended for short stays. Such sites are usually permanent, but					
	there is a limit on the length of time residents can stay.					
Travelling Showpeople	Commonly referred to as Showmen, these are a group of					
	occupational Travellers who work on travelling shows and fairs					
	across the UK and abroad.					
Unauthorised Development	This refers to a caravan/trailer or group of caravans/trailers on land					
	owned (possibly developed) by Gypsies and Travellers without					
	planning permission.					
Unauthorised Encampment	Residing in caravans/trailers on private/public land without the					
	landowner's permission (for example, at the side of the road, on a					
	car park or on a piece of undeveloped land).					
Yard	Term used by Travelling Showpeople to refer to a site.					

Executive Summary

The Study

- 1. The Housing Act 2004 placed a duty upon local authorities to produce assessments of accommodation need for Gypsies and Travellers. In 2006 Sevenoaks District Council published a Gypsy and Traveller Accommodation Needs Assessment (GTAA). This GTAA provided an overview of the accommodation and related needs and experiences of the Gypsy and Traveller population.
- 2. In September 2011 Sevenoaks District Council commissioned the Salford Housing & Urban Studies Unit (SHUSU) at the University of Salford to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment for the district. The primary purpose of this report is to provide an evidence base to inform the future development of planning policies through the Local Development Framework. This report presents the projection of requirements for the following periods:
 - 2012 2016
 - 2017 2021
 - 2022 2026
- 3. The assessment was undertaken by conducting a review of the following data sources:
 - Previous assessments of need and information submitted through the previous regional planning process
 - The policy and guidance context
 - The bi-annual Caravan Count
 - Information from the local authority with regards to pitch provision and supply
 - Information from key stakeholders.
 - A survey of 86 Gypsy, Traveller and Travelling Showpeople households currently residing in Sevenoaks District.
- 4. On a base population of 163 households we consulted with 86 resident households, 53% of the estimated resident Gypsy and Traveller community across the Study Area. We believe that as the sample included a range of accommodation types and household circumstances we have no reason to believe that those households included in the survey are untypical from the total population in the area. Overall, we believe that the findings for the assessment are based on reliable information from accommodation types within the Study Area.
- 5. The fieldwork took place between October and December 2011. The base date used in this assessment is the 1st October 2011.

Local accommodation provision

- 6. There is no one source of information about the size of the Gypsy and Traveller population in the district. Our best estimate is that there are at least 498 local Gypsies, Travellers and Travelling Showpeople living in the District. The population was found across a range of accommodation types:
 - There are **3 socially rented sites** in the District. Two of these are managed by Kent County Council the remaining site is managed by Sevenoaks District Council. Together these sites provide accommodation over 58 pitches.
 - There are **11** authorised permanent private sites in the District. Together these accommodate approximately 30 pitches/households.
 - There are **7** authorised private sites with temporary consent in the District. Together these accommodate approximately 14 pitches/households.
 - There are **8 unauthorised developments** (land owned by Gypsies and Travellers but developed without planning permission) within the District. It is estimated that these sites accommodate approximately 21 pitches/households.
 - It is estimated that there are at least 40 households living in bricks and mortar housing in the District.
 - It is estimated that there is **1 yard for Travelling Showpeople** in the District accommodating a single household.
 - There is little to no evidence of significant need for accommodation arising from the presence of unauthorised encampments within the district.

Characteristics of local Gypsies and Travellers

- 7. The survey of Gypsies and Travellers identified some of the important characteristics of the local population.
 - Household size is significantly larger than in the settled/non-Traveller population at 3.4 persons across the whole sample.
 - A significant minority of the sample (17%) were households over 60 years of age.
 - The majority of Gypsies and Travellers in trailers and in housing can be seen to belong, in some way, to the district. The vast majority of people had lived in the District for over 10 years. Many of these were born or had strong family links in the area.
 - The local population is dominated by Romany Gypsies (91%) with a much smaller number of Irish Travellers (6%).
 - There was a mix of households who still travelled and those who no longer travelled. A number of those who no longer travelled cited education, health and age related reasons for becoming more sedentary.

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Accommodation need and supply

- 8. There are no signs that the growth in the Gypsy and Traveller population will slow significantly. Research from the Equalities and Human Rights Commission (EHRC) has indicated that around 6,000 additional pitches for Gypsies and Travellers are immediately required to meet the current shortage of accommodation within England.
- 9. This study has taken a thorough assessment of the need arising from all sites (social, permanent, temporary and unauthorised) present at the time of the survey. As such this assessment of need should be regarded as a reasonable and robust assessment of need upon which to base planning decisions going forward. Sites given planning permission or developed through new social provision after the 1st October 2011 contribute to the need requirements detailed in the table below.
- 10. Requirements for the additional residential provision for Travelling Showpeople are estimated on the basis of survey findings and local authority information.

Table i: Summary of Gypsy, Traveller and Travelling Showpeople accommodation and pitch need (2012-2026)

	Gypsy and Traveller Pitch Need Total (No. of pitches)	Travelling Showpeople Plot Need Total (No. of plots)
Current authorised residential provision (pitches/plots)	88	0
Residential need 2012–2016 (pitches/plots)	40	0
Residential need 2017–2021 (pitches/plots)	15	0
Residential need 2022–2026 (pitches/plots)	17	0
Residential need 2012–2026 (pitches/plots)	72	0

- 11. It is recommended that this assessment of accommodation need is repeated in due course (circa 5 years) to ensure this assessment remains as accurate as possible.
- 12. Numerical transit requirements have not been provided although an indication of how provision for short-stay households could be made is detailed in the main report.

1. Introduction

Background and scope

- 1.1 The Housing Act 2004 placed a duty upon local authorities to produce assessments of accommodation need for Gypsies and Travellers. In 2006, Sevenoaks District Council published a Gypsy and Traveller Accommodation Needs Assessment (GTAA). This GTAA provided an overview of the accommodation and related needs and experiences of the Gypsy and Traveller population in the area. Crucially, the GTAA identified the accommodation need in the form of residential pitch shortfall of the population on an individual district level. The Sevenoaks GTAA identified a need for 64 pitches over the period 2006-2011. In addition, it was later acknowledged, through the South East Plan Partial Review process, that an additional 2 pitches were needed on account of these being counted as permanent when they were in fact temporary. A separate accommodation assessment for Travelling Showpeople was also produced, covering North and West Kent. This assessment identified a need for 1 plot for Travelling Showpeople within the district.
- 1.2 An additional 8 permanent pitches have been granted since the original GTAA was carried out, including 4 at the Council's Hever Road site. In addition, the Council has sought to meet need by granting a number of temporary permissions. The number of temporary permitted pitches increased from 2 at the time of the GTAA to 23 in March 2011.
- 1.3 In September 2011 Sevenoaks District Council commissioned the Salford Housing & Urban Studies Unit (SHUSU) at the University of Salford to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. The primary purpose of this report is to provide an evidence base to inform the future development of planning policies through the Local Development Framework. This report presents the projection of requirements for the following periods:
 - 2012 2016 (0-5 years)
 - 2017 2021 (6-10 years)
 - 2022 2026 (11-15 years)

Research approach

1.4 The approach to this study involved bringing together various existing data sources with empirical research with the Gypsy, Traveller and Travelling Showpeople communities across the District. Details about the methodology for the assessment can be found in Appendix 1. The methodology entailed a review of the following data sources:

² DCA (2007) North and West Kent Travelling Showpeople Study Final Report 2007.

¹ DCA (2006) Sevenoaks Gypsy & Traveller Study 2006.

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- Previous assessments of need and information submitted through the previous regional planning process
- The policy and guidance context
- The bi-annual Caravan Count
- Information from the local authority with regards to pitch provision and supply
- Information from key stakeholders. These included officers from within Sevenoaks District Council, Kent County Council, the Gypsy Council and the Showmen's Guild. Consultations (written and verbal) were undertaken in order to develop a clearer understanding about the context of provision and need within the area and to help inform the assessment of need. This information has been incorporated into this report in the appropriate places.
- A survey of Gypsies, Travellers and Travelling Showpeople currently residing in the district. This has entailed the completion of interviews with 86 households living in trailers and in houses across Sevenoaks. See Appendix 1 of this report for specific details of this process.
- 1.5 Table 1 summarises the response to the survey by number of sites and estimated/known number of households across sites in the district.

Table 1: Sample in relation to local Gypsy and Traveller population

Type of accommodation		No. of sites			No. of known occupied pitches/households		
		Sample	%	Total	Interview Sample	%	
Socially rented sites	3	3	100	57	27	47	
Residential private authorised pitches (permanent)	11	7	64	30	18	60	
Residential private authorised pitches (temporary)	7	7	100	14	7	50	
Unauthorised developments	8	7	88	21	13	62	
Unauthorised encampments	NA	NA	NA	NA	NA	NA	
Authorised Travelling Showpeople yards	1	1	100	1	1	100	
TOTAL SITE BASED POPULATION	30	25	83%	123	66	54%	
Housed	NA	NA	NA	NA	20	NA	

- 1.6 The key points to note from the methodological approach adopted is that:
 - A sample of around 50% has been achieved and, in most cases, exceeded across all accommodation types
 - Household interviews were achieved on all socially rented sites, sites with temporary consent and the authorised Travelling Showpeople yards.
 - Due to the size of the sample it is reasonable to gross up findings from the survey to the total population of Gypsies, Travellers and Travelling Showpeople in the district. See Chapter 11 for a description of how the survey findings have been translated into accommodation need.

Structure of the report

- 1.7 This report is intended to assist Sevenoaks District Council in its formulation of planning policies for the provision of accommodation for the Gypsy, Traveller and Travelling Showpeople communities. It sets out the background and current policy context, identifies the estimated Gypsy, Traveller and Travelling Showpeople population and presents evidence of need arising within the district.
 - Chapter 2 looks at the past, present and emerging policy context in the area of Gypsy, Traveller and Travelling Showpeople accommodation.
 - **Chapter 3** looks at the trends in caravan numbers evident from the bi-annual count of caravans.
 - Chapter 4 presents the findings from across all authorised social and private sites based on information provided by Sevenoaks District Council and obtained through the survey of Gypsy and Traveller households.
 - **Chapter 5** looks at the level of planning applications made in the district, the presence of unauthorised sites and the views of households on unauthorised sites obtained through the household survey.
 - **Chapter 6** looks at the numbers of Gypsies and Travellers living in bricks and mortar accommodation as well as drawing upon the views of people obtained through the household survey.
 - Chapter 7 looks at issues associated with travelling in order to shed some light on travelling patterns and experiences of Gypsies and Travellers throughout the district
 - Chapter 8 looks at a range of issues including the movement intentions of the sample, the formation of new households and concealment of existing ones and the accommodation preferences of the Gypsy and Traveller population.
 - **Chapter 9** considers the provision of accommodation and need relating to Travelling Showpeople.
 - **Chapter 10** provides an indication as to some of the experiences around access to health services.
 - Chapter 11 provides the numerical assessment of accommodation need for the District.
 - Chapter 12 provides an analysis of the need for transit provision for the District
- 1.8 The base date for this assessment is the 1st October 2011. It should be noted that at the time of the survey, the temporary permissions on two sites, accommodating 9 pitches, had recently expired. Whilst new temporary permissions had been granted on these sites at the time of publication, the analysis presented is based on the position at the time of the survey.

2. Policy context

2.1 This chapter looks at the current and past policy context impacting on the assessment of need and the provision of accommodation for Gypsies, Travellers and Travelling Showpeople.

Planning policy 2006-2011

- 2.2 The main document for detailing planning policy in England over the 2006-2011 period was ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*. This specifies that the aims of legislation and policy were to:
 - ensure that Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provision;
 - reduce the number of unauthorised encampments and developments;
 - increase significantly the number of Gypsy and Traveller sites in appropriate locations and with planning permission in order to address under-provision by 2011;
 - protect the traditional travelling way of life of Gypsies and Travellers;
 - underline the importance of assessing accommodation need;
 - promote private site provision; and,
 - avoid Gypsies and Travellers becoming homeless, where eviction from unauthorised sites occurs and where there is no alternative accommodation.
- 2.3 The circular directed local authorities to assess needs through Gypsy and Traveller Accommodation Assessments which should then form part of the evidence base for subsequent Development Plan Documents.
- 2.4 Travelling Showpeople were the subjects of separate planning guidance, CLG Circular 04/07, which aimed to ensure that the system for pitch assessment, identification and allocation as introduced for Gypsies and Travellers was also applied to Travelling Showpeople.

Regional planning policy

2.5 ODPM Circular 01/2006 made it clear that district level requirements identified in GTAAs were to be submitted to the relevant Regional Planning Body (RPB). The RPB would then, in turn, provide pitch requirements on a district by district basis once a strategic view of needs had been taken through the process of producing the Regional Spatial Strategy (RSS).

³ In the case of the South East this was the South East of England Regional Assembly (SEERA) which was then dissolved with the planning function transferring to the South East England Partnership Board

2.6 During early 2010 a Partial Review of the South East RSS on Gypsies and Travellers was examined in public, including the regional pitch requirements identified for the Gypsy, Traveller and Travelling Showpeople communities. In July 2010 the Secretary of State announced his intention to revoke all Regional Strategies, as a consequence the South East RSS Partial Review was not completed. Local authorities were advised to continue to develop LDF core strategies and, where these had already been adopted, use the adopted Development Plan Documents as the local planning framework. Specific guidance was provided in July 2010 in the form of a letter from the Chief Planner in order to assist in the determination of provision for Gypsy and Traveller sites. With respect to the needs of Gypsies and Travellers this guidance stated that:

"Local councils are best placed to assess the needs of travellers. The abolition of Regional Strategies means that local authorities will be responsible for determining the right level of site provision, reflecting local need and historic demand, and for bringing forward land in DPDs. They should continue to do this in line with current policy. Gypsy and Traveller Accommodation Assessments (GTAAs) have been undertaken by all local authorities and if local authorities decide to review the levels of provision these assessments will form a good starting point. However, local authorities are not bound by them. We will review relevant regulations and quidance on this matter in due course."

Current planning policy

- 2.7 The government has formulated a new planning framework for England and Wales in the form of the National Planning Policy Framework (NPPF). Among the many significant changes to the planning system the NPPF places greater emphasis of the role communities can play in the planning process. The NPPF also contains a presumption in favour of sustainable development and makes provisions for the protection of the Green Belt.
- 2.8 The specific planning framework that will be implemented for Gypsy, Traveller and Travelling Showpeople accommodation provision has also been released. This replaces Circulars 01/06 and 04/2007. This states that:

Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. This policy must be taken into account in the preparation of development plans, and is a material consideration in planning decisions. Local planning authorities preparing plans for and taking decisions on traveller sites should also have regard to the policies in the National Planning Policy Framework so far as relevant.

2.9 The Policy states that the Government's overarching aim is:

⁴ http://www.communities.gov.uk/documents/planningandbuilding/pdf/1631904.pdf

⁵ (CLG, 2012) *Planning for traveller sites* http://www.communities.gov.uk/documents/planningandbuilding/pdf/2113371.pdf

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.

- 2.10 The Policy outlines the Government's aims in respect of traveller sites:
 - that local planning authorities should make their own assessment of need for the purposes of planning;
 - to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
 - to encourage local planning authorities to plan for sites over a reasonable timescale;
 - that plan-making and decision-taking should protect Green Belt from inappropriate development;
 - to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
 - that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective;
 - for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies;
 - to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply;
 - to reduce tensions between settled and traveller communities in plan-making and planning decisions;
 - to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure; and,
 - for local planning authorities to have due regard to the protection of local amenity and local environment.
- 2.11 Policy A of 'Planning Policy for Traveller Sites' states that in assembling the evidence base necessary to support their planning approach, local planning authorities should:
 - a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)
 - b) co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit

- accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities
- c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 2.12 This accommodation assessment is one of the main components in the evidence base required in the preparation of the planning approach for Gypsy, Traveller and Travelling Showpeople sites for Sevenoaks District Council. It has been developed through engagement with Gypsies, Traveller and Travelling Showpeople in Sevenoaks District and through discussion with key stakeholders, in accordance with national policy.

Defining Gypsies and Travellers

- 2.13 Defining Gypsies and Travellers is not straightforward. Different definitions are used for a variety of purposes. At a very broad level the term 'Gypsies and Travellers' is used by non-Gypsies and Travellers to encompass a variety of groups and individuals who have in common a tradition or practice of nomadism. More narrowly both Romany Gypsies and Irish Travellers are recognised minority ethnic groupings.
- 2.14 At the same time Gypsies and Travellers have been defined for accommodation and planning purposes. The statutory definition of Gypsies and Travellers for Gypsy and Traveller Accommodation Assessment required by the Housing Act 2004 is:
 - (a) persons with a cultural tradition of nomadism or of living in a caravan; and (b) all other persons of a nomadic habit of life, whatever their race or origin, including:
 - (i) such persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently; and
 - (ii) members of an organised group of travelling showpeople or circus people (whether or not travelling together as such).
- 2.15 The new planning policy contains a separate definition for planning purposes which offers a narrower definition and excludes Travelling Showpeople:
 - 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 dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such.
- 2.16 This definition focuses more narrowly upon people who either still travel or have ceased to do so as a result of specific issues and can as a consequence demonstrate specific land use requirements.
- 2.17 A separate definition of Travelling Showpeople is provided within the planning policy:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised 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.

2.18 The new planning policy document uses the term 'traveller' to refer to both Gypsy and Traveller communities and populations of Travelling Showpeople. This has been used as it is recognised that this definition is '...more pragmatic and wider and enables local planning authorities to understand the possible future accommodation needs of this group and plan strategically to meet those needs'. However, the study has also had regard to the planning definition where it is considered appropriate to do so.

Housing/accommodation need

- 2.19 Crucially, for Gypsies and Travellers, the definition of housing need is varied slightly to acknowledge the different contexts in which members of these communities live. The general definition of housing need is "households who are unable to access suitable housing without some financial assistance", with housing demand defined as "the quantity of housing that households are willing and able to buy or rent."
- 2.20 In recognising that in many cases these definitions are inappropriate for Gypsies and Travellers, the guidance on producing Gypsy and Traveller Accommodation Assessments⁸ refers to distinctive requirements that necessitate moving beyond the limitations of the definition for both caravan dwellers and those in bricks and mortar housing. For caravan dwelling households, need may take the form of those:⁹
 - who have no authorised site on which to reside;
 - whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation; and
 - who contain suppressed households who are unable to set up separate family units and are unable to access a place on an authorised site, or obtain or afford land to develop one.
- 2.21 In the context of bricks and mortar dwelling households, need may take the form of:

⁶ CLG (2011) *Planning for traveller sites*. Consultation Paper, April, London: HMSO http://www.communities.gov.uk/documents/planningandbuilding/pdf/1886164.pdf

⁷ ODPM (2006) *Definition of the term 'Gypsies and Travellers' for the purposes of the Housing Act 2004*. Consultation Paper, February, London: HMSO.

⁸ GTAA guidance has been used in developing the methodology but variations to the approach have been made to take account of local circumstances, where considered appropriate

⁹ CLG (2007) *Gypsy and Traveller Accommodation Needs Assessments* – Guidance. London: HMSO.

- those whose existing accommodation is overcrowded or unsuitable (including unsuitability by virtue of psychological aversion to bricks and mortar accommodation).
- 2.22 The needs presented in this report reflect both the definition of Gypsies and Travellers as used in the Housing Act 2004, which gives an overall strategic level of accommodation need, and the new planning policy which indicates the proportion of site-based need for operational purposes. It should also be noted that steps have been taken within this report to analyse need in the context of local and historic demand.
- 2.23 Housing need is assessed at the level of a single family unit or household (broadly a group of people who regularly live and eat together). On Gypsy and Traveller sites, this is assumed to equate to a 'pitch'; in housing, to a separate dwelling.

Defining a pitch

- 2.24 There is no set definition for what constitutes a Gypsy and Traveller residential pitch. In the same way as in the settled community, Gypsies and Travellers require various accommodation sizes, depending on the number of family members.
- 2.25 The convention used in this report is that a pitch is the place on a Gypsy and Traveller site accommodating a single family/household. In some cases a single pitch may account for the entire site. The number of caravans that a household uses can be a single unit (trailer, touring caravan, static, chalet etc.) or more. In order to ensure comparability across accommodation types it is important to determine a convention when translating caravan numbers into pitches/households.
- 2.26 The convention in the last round of GTAAs, and an approach advocated by CLG guidance, was the use of a 1.7 caravan to pitch ratio. Taking a more locally informed approach this assessment has indicated that from a base of 65 site based interviewees a total of 108 caravans are owned/used. This provides a 1.7 caravan to pitch ratio across the sample. ¹⁰ Therefore throughout this assessment a 1.7 caravan to pitch ratio is used to determine need.

Conventions

- 2.27 Two conventions are followed in this report:
 - Percentages in text and tables are rounded to the nearest whole number; this
 means that they do not always sum to exactly 100.
 - 'Quotes' included from Gypsies and Travellers are sometimes in first and sometimes in third person form because interviews were not audio recorded but noted in written form. They are distinguished by being in italic type and usually inset.

¹⁰ Although we attempted to distinguish between caravans used for living, sleeping and storage the survey findings indicate trailers have multiple uses serving all these uses for the vast majority of the time.

3. The bi-annual Caravan Count and size of the population

3.1 This chapter looks at the Count of Gypsy and Traveller Caravans in order to present what is known about Gypsies and Travellers within the Study Area. This chapter presents information on the estimated size of the Gypsy and Traveller population.

Caravan numbers and trends from the Caravan Count

- 3.2 The bi-annual caravan count provides a snapshot of the local context in terms of the scale and distribution of caravan numbers across the District. The Count provides a useful starting point in assessing the current picture and recent trends. Indeed, in the absence of other datasets it is virtually the only source of information on Gypsy and Traveller caravan data. However, there are well documented issues with the robustness of the count. Such issues include: the 'snapshot' nature of the data, the inclusion of caravans and not households, the exclusion of Travelling Showpeople, and the exclusion of Gypsies and Travellers in housing. It should be noted that the analysis contained in this report should be considered a more robust assessment of the current situation with regards to the local population than the Caravan Count, this is demonstrated further in Chapter 11.
- 3.3 Table 3.1 provides the distribution of caravan numbers for Sevenoaks since January 2006 with this illustrated in Figure 3.1. These figures have been adjusted to account for inaccuracies observed in the published data

Table 3.1: Caravan numbers across accommodation types within Sevenoaks

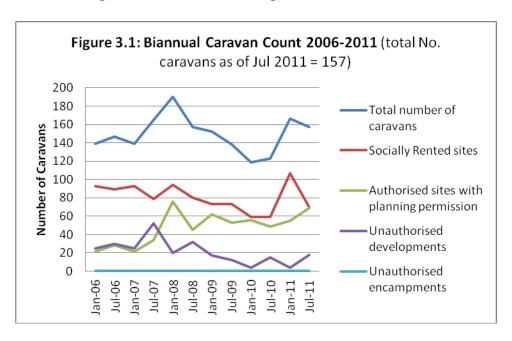
	Authorised sites with planning permission		Unauthorised sites		
	Caravans on Socially Rented sites	Caravans on authorised private sites with planning permission	Caravans on unauthorised developments	Caravans on unauthorised encampments	Total No. caravans
Jan-06	93	21	25	0	139
Jul-06	89	28	30	0	147
Jan-07	93	21	25	0	139
Jul-07	79	34	52	0	165
Jan-08	94	76	20	0	190
Jul-08	80	45	32	0	157
Jan-09	73	62	17	0	152
Jul-09	73	53	12	0	138
Jan-10	59	56	4	0	119
Jul-10	59	49	15	0	123
Jan-11	107	55	4	0	166
Jul-11	70	69	18	0	157

-

¹¹ Niner, P. (2002) Review of the ODPM Caravan Count. London: ODPM.

¹² The January 2011 count included a count of Travelling Showpeople caravans for the first time. However, as this is not comparable with previous years and as 0 caravans have been identified this is excluded from the tables in this report.

- 3.4 Table 3.1 shows the following:
 - Caravan numbers on socially rented sites have declined steadily in recent years but have increased significantly, returning to 2008 levels, in January 2011.
 - Caravan numbers on private sites increased in 2008 but have declined since and been relatively stable in recent years.
 - There has been a decrease in the number of caravans recorded on unauthorised developments and a corresponding increase in the number of caravans on authorised private sites. This distribution is likely caused by the granting of temporary consent to a number of households previously on unauthorised developments.
 - There have been no caravans recorded on unauthorised encampments over the period.
 - Overall caravan numbers have increased by 19% between Jan 2006 Jan 2011 (January is taken as it is generally considered to represent 'resident' households as opposed to July which tends to include a degree of seasonality).
 - Recent increases in caravan numbers are almost entirely accounted for by an increase in the number of caravans counted on socially rented sites.
- 3.5 The following chart illustrates the trends in caravan numbers recorded in the count and described above. There appears to be little seasonality in caravan numbers (i.e. absence of significant summer travelling).



The size of the local Gypsy and Traveller community

3.6 For most minority ethnic communities, presenting data about the size of the community in question is usually relatively straightforward (with the exception of communities who have large numbers of irregular migrants and migrant workers etc. amongst them). However, for Gypsies, Travellers and Travelling Showpeople, one of the most difficult issues is providing accurate information on the size of the

population. As a result, we have used information provided by the local authorities and key stakeholders, together with our survey findings, in order to provide a best estimate as to the size of the local Gypsy and Traveller population at the time of the assessment.

3.7 Table 3.2 presents the estimation of the size of the Gypsy, Traveller and Travelling Showpeople population. Using the best information available we estimate that there are at least 498 individuals or 163 households in the Study Area.

Table 3.2: Gypsy and Traveller population based in the area

T f	Families/ Households		
Type of accommodation	(based on 1 pitch = 1 household)	Individuals	Derivation
Socially rented sites	57	149	Actual numbers taken from information supplied by Kent County Council and Sevenoaks District Council
Private sites (permanent)	30	96	Estimated number of pitches multiplied by average household size from the survey (3.2)
Private sites (temporary)	14	50	Estimated number of pitches multiplied by average household size from the survey (3.6)
Unauthorised developments	21	74	Estimated number of pitches multiplied by average household size from the survey (3.5)
Housing	40 ¹³	128	Number of families estimated to live in the area multiplied by average household size from the survey (3.2)
Travelling Showpeople	1	1	Number of plots multiplied by an estimate of the household size for Travelling Showperson (1 adult)
Total	163	498	

population.

as a conservative estimate, we assume we have interviewed 50% of the actual bricks and mortar-based

¹³ We did not receive any information regarding the accurate size of the Gypsy and Traveller bricks and mortar-based population. It is generally agreed that there are now more Gypsies and Travellers living in conventional housing in the UK than living on sites or unauthorised encampments. The Commission for Racial Equality's 2006 report *Common Ground: Equality, good race relations and sites for Gypsies and Irish Travellers* suggested that the housed population could be around 3 times the trailer-based population. Using a multiplier of 3 times the site population may be excessive in the absence of definitive evidence of the size of the population. Therefore,

4. Authorised social and private sites

4.1 A certain degree of caution needs to be taken when extrapolating the characteristics, trends and needs of the Gypsy and Traveller population from the Caravan Counts and other such data alone. In order to provide more specific information on the local Gypsy and Traveller population, this section draws upon the information provided by Sevenoaks District Council and Kent County Council on site provision within the district as well as information obtained through a survey of Gypsy and Traveller households.

Socially rented sites

4.2 There are three socially rented sites in the District. Together these sites provide residential accommodation on 58 pitches. Each is detailed below and summarised in Table 4.1.

Hever Road

- 4.3 This site currently has a total of 16 residential pitches. At the time of this study 15 of these were occupied and there was 1 vacancy; this pitch is currently in the process of being allocated. There is usually a high level of occupancy on the site (between 75%-100%). The following vacancies have arisen on the site over the last few years:
 - 2011 5
 - 2010 − 1
 - 2009 4
 - 2008 2
- 4.4 All these vacancies were subsequently re-let.
- 4.5 The site has a waiting list which consists of 2 applicants, this number has remained static for the last few years. Four pitches have recently been developed and there are no plans to develop any more pitches on the site. Before undertaking the recent development on the site (involving the provision of 4 additional pitches), the Council reconsidered plans for a larger increase of the site following consultation with the site's existing residents.
- 4.6 There are currently 31 people living on the site (23 adults; 5 children under 5 years of age; 3 children 5-11 years; and, 1 child 12-16 years). Most residents are long term (over 5 years) residents. Each pitch has an amenity unit which has a bath, shower, WC, space for cooking, heating and space/provision for laundry facilities.
- 4.7 Licensees are permitted to be absent for up to 12 weeks of the year subject to the payment of their licence fee. Visitors are permitted on the site.

- 4.8 There is a formal policy for allocating pitches on the site with the most important factors being, in rank order:
 - 1. Being homeless
 - 2. Being a Gypsy
 - 3. Medical/special health needs
- 4.9 The weekly rent is £70.35 with all/almost all residents receiving housing benefit payments.
- 4.10 The site has previously received funding from the Gypsy and Traveller Sites Grant to increase the pitches, provide new amenity blocks, improve the roads, and make improvements to drainage and the electrical supply.
- 4.11 No pitch was seen to be currently doubled up on the site

Polhill Caravan Park

- 4.12 This site currently has a total of 7 residential pitches and all were occupied at the time of this study. There is usually a high level of occupancy on the site (100%). Only 1 vacancy has arisen on the site, in 2011, in recent years; this pitch was immediately re-let.
- 4.13 The site has a waiting list which consists of 13 applicants, this number has remained static for the last few years.
- 4.14 There are currently 23 people living on the site (14 adults; 4 children under 5 years of age; 2 children 5-11 years; and, 3 children 12-16 years). Most residents are long term (over 5 years) residents. Each pitch has an amenity unit which has a bath, shower, WC, space for cooking, heating and space/provision for laundry facilities.
- 4.15 Licensees are permitted to be absent for up to 12 weeks of the year subject to the payment of their licence fee. Visitors are permitted on the site subject to certain restrictions (i.e. agreement of site manager and adherence to site rules and regulations).
- 4.16 There is a formal policy for allocating pitches on the site with the most important factors being, in rank order:
 - 1. Need for accommodation
 - 2. Medical/special health needs
 - 3. Family size/composition
- 4.17 The weekly rent is £43.30 with all/almost all residents receiving housing benefit payments.
- 4.18 No pitch was seen to be currently doubled up on the site

Barnfield Park

- 4.19 This site currently has a total of 35 residential pitches and all were occupied at the time of this study. No vacancies have recently arisen on the site and the site is usually fully occupied throughout the year.
- 4.20 The site has a waiting list which consists of 17 applicants, this number has remained static for the last few years.
- 4.21 There are currently 95 people living on the site (75 adults; 8 children under 5 years of age; 4 children 5-11 years; and, 8 children 12-16 years). Most residents are long term (over 5 years) residents. Each pitch has an amenity unit which has a bath, shower, space for cooking, heating and space/provision for laundry facilities.
- 4.22 Licensees are permitted to be absent for up to 12 weeks of the year subject to the payment of their licence fee. Visitors are permitted on the site subject to certain restrictions (i.e. agreement of site manager and adherence to site rules and regulations).
- 4.23 There is a formal policy for allocating pitches on the site with the most important factors being, in rank order:
 - 1. Need for accommodation
 - 2. Medical/special health needs
 - 3. Family size/composition
- 4.24 The weekly rent is £46.40 with all/almost all residents receiving housing benefit payments.
- 4.25 A total of 6 pitches reportedly contained households which were considered to be doubled up i.e. containing individuals who require a separate pitch or house of their home. These consisted of grown-up children living on their parents/families pitch together with their own families. It is understood from discussions with Kent County Council that a number of other households (approximately 18 households) also reported cramped conditions on the site but it is understood that these could be alleviated by a level of site remodelling/refurbishment.

Table 4.1: Overview of socially rented sites

	Hever Rd	Polhill	Barnfield Park
Total number of pitches	16	7	35
Number of occupied pitches	15	7	35
Site population	31	23	95
Number of children	9	4	20
% children	29%	39%	21%
Average persons per occupied pitch	2	3.3	2.7
Doubled-up pitches	0	0	6
Ethnic groups among site residents	Mostly	Mostly	Mostly
Etimogroups among site residents	Romany Gypsy	Romany Gypsy	Romany Gypsy
Pitch occupancy in year	75%-100%	100%	100%
% of site residents lived on site 5+ years	Over 90%	Over 90%	Over 90%
Weekly rent	£70.35	£43.30	£46.40
Managament	Sevenoaks	Kent County	Kent County
Management	DC	Council	Council

Socially rented sites residents: findings

- 4.26 A total of 27 people were interviewed across these sites. The residents were mostly Romany Gypsies on both sites although one person described themselves as 'Traveller'.
- 4.27 A total of 11 respondents owned a single caravan, 13 respondents owned two caravans and 3 respondents owned three caravans. The average number of caravans to households was 1.7.
- 4.28 Around a half of respondents (48%) reported that this gave them enough room. Of the other half of the sample:
 - 5 respondents wanted a larger plot
 - 3 respondents wanted more living space
 - 2 respondents wanted more caravans
 - 1 respondent wanted a larger living unit
 - 1 respondent wanted a separate plot
 - 1 respondent wanted a larger amenity unit.
- 4.29 The reported lack of space was particularly acute from respondents on the Barnfield Park site.
- 4.30 When asked why they had come to live in the area people cited a variety of reasons, see Table 4.2 below. The most common reason cited however was that there was a vacancy on the site.

Table 4.2: Main reason for living in the area

Main reason for living in the area	%
There was a vacancy	48
Other	15
Born/raised here	11
To be near family/friends	11
Work available in the area	7
For children's education	4
Moved with parents/family	4

Base: 27 respondents

4.31 In terms of 'other' reasons these were:

Because it is a small site and good for the children's schooling

I was evicted by my Mum when I got pregnant

There is more open space here

Was travelling around with children and needed somewhere safe to stay. It's hard to travel with children.

- 4.32 70% of respondents reported that they do not have visitors to stay on their pitch with them. A third (33%) of respondents reported that accommodating visitors on the site was a problem mainly due to the fact that the Council (County and District) may not allow visitors and that their pitch/site did not have room. There is clearly some discrepancy here with what the Council's allow in terms of visitors and the perceptions of residents.
- 4.33 The vast majority of respondents we spoke to said that they had lived in the area for 10 years or more (67%). Relatively few respondents reported living in the area for less than 5 years, see Table 4.3. There were very similar levels reported when respondents were asked how long they had lived on the site providing support for the information received from the District and County council about the long-term nature of the socially rented tenants in the area.

Table 4.3: Length of time living in the general area

Length of time	% of respondents
10 years or more	67
More than 5 years less than 10	15
More than 3 years less than 10	7
More than 1 year less than 3	4
More than 6 months less than 1 year	4
Don't know	4

Base: 27 respondents

- 4.34 Very few residents left the area during the year. A total of 63% of respondents on the socially rented sites reported that they never leave, with the remainder saying that they travel away for around 10 weeks of the year. When asked where they tended to go most cited short periods of travel to such places such as Bournemouth, Chesterfield, other parts of Kent, Scotland as well as a minority of people reporting visiting fairs. Most travel was seen to be related to the summer time.
- 4.35 No respondent reported having a base elsewhere

Authorised private sites

4.36 This section looks at private sites across the Study Area. There is a number of small to medium sized authorised private sites in the district. It proved difficult to accurately establish the pitch capacity of all private sites. Planning permissions are often based on a maximum number of caravans rather than clearly defined pitches. Where pitch numbers are not defined, we have used a 1.7 caravan to pitch ratio to ascertain the approximate number of pitches. As can be seen in Table 4.4 there are 17 authorised private sites in the district, of these 11 have permanent planning permission which have a combined capacity of around 30 pitches. There are 7 sites (6 independent sites and an existing permanent site) with temporary planning permission which have a combined capacity of around 14 pitches. These are presented in greater detail in Appendix 3.

Table 4.4: Private sites in the district

Consent	No. of sites	Estimated No. of pitches
Permanent	11	30
Temporary	7 ¹⁵	14
Total (est)	17	44

4.37 Appendix 3 provides details of all the private sites that currently have temporary planning permission within the District. The planning consent for all these sites is due to expire within the assessment period.

Permanent private site residents: findings

- 4.38 A total of 18 people were interviewed on the permanent private sites. Of these 78% owned the pitch they were occupying and 22% were renting the pitch. All respondents owned their trailers.
- 4.39 Most respondents (61%) reported that they either had a single living unit. The remaining respondents reported that they had two living units (39%). The average number was 1.4 caravans per household. All respondents reported that their current accommodation provided them with enough living space.

¹⁵ There are 6 independent sites and a further 2 pitches with temporary planning permission on an existing permanent private site.

¹⁴ As described earlier this ratio is commonly used in GTAA research however, the caravan to pitch ratio based on the sample for the assessment across all private sites (permanent and temporary) was 1.7

- 4.40 Most respondents reported that they did not host visitors on their pitch/site (89%). Only two respondents (11%) reported hosting visitors on a short term basis. In terms of who visited the site this was either close family or friends for short periods in the year. Only one respondent commented that hosting visitors was a problem due to being a tenant on a rented site.
- 4.41 All respondents reported having lived in the area (i.e. Sevenoaks district) for 10 years or over. There were very similar levels reported when respondents were asked how long they had lived on the site where the interview took place, see Table 4.5 below.¹⁶

Table 4.5: Length of time living on the site with permanent planning permission

Length of time	%
10 years or more	83
Between 5-10 years	6
Between 3-5 years	0
Between 1 -3 years	11

Base: 18 respondents

4.42 When asked why they had come to live in the general area people cited a variety of reasons, see Table 4.6 below. The most common reason cited however was a vacancy (47%) followed by being born or raised on the site (39% of respondents).

Table 4.6: Most important reason for living in the area

Most important reason for living in the area	%
There was a vacancy	47
Born/raised here	39
Land/pitch was available to buy	17
To be near family/friends	11
Moved with parents/family	11
Convenient for working pattern	6

Base: 18 respondents

- 4.43 A total of 50% of respondents reported never leaving the area throughout the year, 33% reported that they lived in the area between 41-51 weeks of the year, while 17% of respondents did not know. The main reason given for travelling away was attendance at fairs. One respondent mentioned travelling away for work.
- 4.44 No respondent reported having a base elsewhere

Temporary private site residents: findings

4.45 It should be noted that the number of temporary permissions at the time of the survey was lower (by 9 pitches) than observed in March 2011 as a result of a number of permissions expiring. At the time of the completion of this report, the 9 additional temporary permissions had been granted, with a corresponding reduction in the number of unauthorised sites. However, the figures below are based on the position identified during the survey work.

 $^{^{16}}$ It should be noted that the interviewers directed respondents to interpret 'in the area' throughout the survey as within Sevenoaks District

- 4.46 A total of 7 people were interviewed on the temporary private sites. All owned the pitch they were occupying.
- 4.47 One respondent had 1 trailer, five respondents had 2 trailers and 1 respondent had 4 trailers. The average number of trailers per household was 2.1. All respondents thought they had enough living space. For those who did host visitors the visitor profile was similar to those on permanent sites i.e. close and extended family members who tended to visit infrequently.
- 4.48 The vast majority of residents on the temporary sites we spoke to said that they had lived in the area for 10 years or more (86%). The other 14% (1 respondent) had lived in the area for between 6-12 months prior to the interview. In terms of how long people had lived on the site where they were interviewed, 29% (2 respondents) had lived there for 10 years or over with 43% (3 respondents) living there for between 5-10 years, see Table 4.7.

Table 4.7: Length of time living on the site with temporary planning permission

Length of time	%
10 years or more	29
Between 5-10 years	43
Between 3-5 years	14
Between 1 -3 years	0
Between 6-12 months	14
Between 3-6 months	0
Between 1-3 months	0
2-4 weeks	0
Don't know	0

Base: 7 respondents

4.49 Although a number of reasons were cited for living in the area the majority either cited family connections (29%) or that they were born in the area (29%), see Table 4.8 below.

Table 4.8: Most important reason for living in the area

rable not wost important reason for hving in the area		
Most important reason for living in the area	%	
Born here	29	
Having family living here	29	
Children's education	14	
Work in the area	14	
Other ("lived here for years")	14	

Base: 7 respondents

- 4.50 A total of 43% of respondents reported never leaving the area throughout the year, 43% reported living in the area for between 41-51 weeks of the year. One respondent (14%) did not know how many weeks a year they lived in the area. The reasons for leaving the area for these periods were similar to those provided by respondents on sites with permanent planning permission specifically Traveller fairs and visits to family.
- 4.51 No respondent reported having access to a base elsewhere.

5. Planning and unauthorised sites

5.1 The development of unauthorised sites for Gypsies and Travellers can be a major source of tension between Gypsies and Travellers and the settled population. The current planning system is intended to create conditions where there is no need for unauthorised developments because land will be allocated for authorised site development within the Local Development Framework. This chapter focuses upon the development of Gypsy and Traveller sites without planning permission. This chapter then looks at the presence of unauthorised encampments in the area.

Planning applications

5.2 Table 5.1 outlines the number of planning permissions submitted for pitches over the period of 2004 – 2011 excluding sites where applications were made to extend the permission on existing temporary sites.

Table 5.1: Number of planning applications over the period 2004-2011

Year	Number of Applications	Number of pitches permission applied for	Number of applications on sites not previously subject to an application since April '04	Number of pitches on sites not previously subject to an application since April '04
04/05	4	11	4	11
05/06	6	31	4	29
06/07	8	18	7	16
07/08	8	18	3	3
08/09	7	21	3	3
09/10	4	11	3	5
10/11	4	7	1	1

- 5.3 This table shows a large increase in the number of pitches applied for in the 2005-2006 period for larger (but still relatively small) sites. Since then applications have been made for smaller sites consisting of around 2 pitches on average.
- 5.4 It is worth observing that since temporary permissions began to be granted in 2006/07 the level of demand for new site development has fallen significantly. This is particularly the case for sites not previously considered through the planning application process. Table 5.1 may suggest that when the pitch needs for Gypsies and Travellers currently living in the District are met permanently, the remaining annual demand will be relatively low. This contradicts popular notions of a 'honeypot effect' where the provision of sites attracts greater number of applications as this does not appear to be occurring in practice across the District.
- 5.5 In order to meet the need identified as a result of the last GTAA there has been a tendency to grant temporary consent to pitches as opposed to permanent consent, in accordance with national planning policy. It should also be noted that the use of temporary planning consents will not address the long-term needs of Gypsies and Travellers in the District. The use of such consents merely postpones meeting the need thus causing added uncertainty to the applicants, local community and local authority.

Unauthorised development of Gypsy and Traveller sites

- At the time of the study there were a total of 8 unauthorised developments within the District. Table A3.3 which can be found in Appendix 3 provides details of the unauthorised sites and presents the estimated pitch size of each. It is estimated that these 8 sites accommodate 21 pitches/households across Sevenoaks.
- 5.7 As stated above it should be noted that the number of unauthorised developments at the time of the survey was higher (by 9 pitches) than observed in March 2011 as a result of a number of temporary permissions expiring. At the time of the completion of this report, the 9 additional temporary permissions had been granted, with a corresponding reduction in the number of unauthorised sites. The figures below are based on the position identified during the survey work.

Unauthorised developments residents: findings

- 5.8 A total of 13 households were interviewed across 7 of the 8 sites. In terms of number of trailers on these, most respondents had a single trailer (69%), two (23%) or, in one occurrence, three trailers (7%). The average was 1.4 caravans to a household. All households reported that this gave them enough space.
- 5.9 The sample was split between those respondents who had visitors to stay with them for short periods (42%) and those who did not (42%). Two respondents (17%) did not know. All respondents reported that it was not a problem to host visitors if they chose to do so.
- 5.10 The vast majority of residents on the unauthorised developments we spoke to said that they had lived in the area for 10 years or more (92%) with the remaining respondent reporting that they had lived in the area between 5 and 10 years (8%).
- 5.11 Similarly, a significant number of these reported living on the site where they were interviewed for significant periods of time, 77% reported having had lived on the site for 10 years or more, see Table 5.1 below.

Table 5.1: Length of time living on the unauthorised site

Length of time	%
10 years or more	77
Between 5-10 years	15
Between 3-5 years	8

Base: 13 respondents

5.12 Although a number of reasons were cited for living in the area the majority either cited being born in the area (41%) or having family connections (25%), see Table 5.2 below.

Table 5.2: Most important reason for living in the area

Most important reasons for being in the area	%
Born here	41
Having family living here	25
Children's schooling/education	17
Health reasons	8
Looking after a family member	8

Base: 12 respondents

5.13 A total of 39% of respondents reported never leaving the area throughout the year, 46% reported that they lived in the area between 41-51 weeks of the year, see Table 5.3 below.

Table 5.3 How many weeks of the year lived in the area

Length of time	%
52 weeks/never leave	39
Between 41-51 weeks	46
Don't know	15

Base: 13 respondents

- 5.14 The reasons for leaving the area for these periods were similar to those provided by respondents on sites with planning permission i.e. visits to fairs and visits to family and friends.
- 5.15 One respondent reported being able to use a private site in Romford when travelling, although it is unknown who owns this site.

Unauthorised encampments: findings

- 5.16 The presence and incidence of unauthorised encampments is often a significant issue that impacts upon local authorities, landowners, Gypsies and Travellers and the settled population. Unauthorised encampments are often the type of accommodation which has become synonymous with Gypsies and Travellers due to often residing on public and private land.
- 5.17 Due to the nature of unauthorised encampments (i.e. unpredictability, seasonal fluctuations etc.), it is often very difficult to grasp a comprehensive picture of need for residential and/or transit accommodation without considering a range of interconnected issues. However, as seen in Chapter 3 the level of encampment has been nil in the last five years. Indeed during the fieldwork for this assessment we did not receive notification of any unauthorised encampments within the district.
- 5.18 The authority does not keep a log of unauthorised encampments as this data is collected by Kent County Council. Information from Kent County Council indicated that over the last 2 years there had been 1 unauthorised encampment in 2011 and 1 unauthorised encampment over 2010 within the District.

6. Gypsies and Travellers in social and private bricks and mortar accommodation

6.1 The numbers of Gypsies and Travellers currently accommodated within bricks and mortar accommodation are unknown, but potentially large. Movement to and from housing is a major concern for the strategic approach, policies and working practices of local authorities. Moreover, this was an issue raised in the Panel Report of the South East Regional Spatial Strategy Partial Review which commented on the lack of consideration given to households accommodated in bricks and mortar housing in the previous GTAA covering the District.

Estimating the size of Gypsy and Traveller population in bricks and mortar housing

6.2 Neither the local authority officers nor members of the local Gypsy and Traveller communities in the area were able to accurately estimate the size of the Gypsy and Traveller population in bricks and mortar housing in the District. However a response from the Gypsy Council indicated that the number of Gypsies and Travellers in the area could amount to a sizeable population:

It is hard to tell how many there are [Gypsies and Travellers]... but there are so many in all the big council estates in and around Maidstone and **Sevenoaks**. Because of the agricultural industry. There has never been any interest in any G&Ts who are in housing, within the boroughs, It could be as much as 24 to 30% of the total population. As you say, the GTAAs were so small it was only a guide...The outlying villages have also got a high number in them.¹⁷

- 6.3 The Commission for Racial Equality's 2006 report, *Common Ground: Equality, good race relations and sites for Gypsies and Irish Travellers*, suggested that the housed populations was around 3 times the number of trailer-based populations. This would however, provide a potential housed population of 306 households. This figure would appear unrealistic given the relatively small size of the District. In the absence of accurate evidence as to the numbers in housing we base the estimate of the base population of Gypsies, Travellers and Travelling Showpeople living in houses on the number of interviews with bricks and mortar-based households we secured.
- In order to engage with households in bricks and mortar housing the community interviewers who worked as fieldworkers on the study deployed three main strategies. They utilised their own extensive social networks in order to find people who lived in houses in the District, they asked people who they interviewed on sites if they knew of people in houses and if they would be happy to pass on their details, they utilised snowball sampling where one respondent in housing recommended engaging with similar households. Engaging with households in bricks and mortar housing appeared unproblematic and more interviews could have been made

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¹⁷ From personal email correspondence with Joe Jones of the Gypsy Council

¹⁸ Number of authorised households on sites (socially rented 58, private permanent 30, private temporary 14) equals 102 trailer based houses multiplied by 3.

- possible given more time. This leads us to assume that the households we interviewed constitute only a proportion of the entire population in bricks and mortar housing.
- 6.5 Therefore, as a pragmatic working assumption, which allows for a reasonable consideration of need arising from households in bricks and mortar, we assume we have interviewed 50% of the actual bricks and mortar-based population. Therefore, by doubling the number of interviews attained we posit that there are at least 40 households living in bricks and mortar in the District.¹⁹
- 6.6 It should be noted that we believe that this may be an understatement of the actual housed population but it is based on the best information available at the time of the assessment. A more accurate estimation of the numbers of Gypsies, Travellers and Travelling Showpeople in houses will only be possible when a number of issues are resolved:
 - Gypsies, Travellers and Travelling Showpeople feel able to disclose their ethnic group in monitoring forms
 - Monitoring forms allow for the ethnic groups as options
 - The data from the Census 2011 is released
- 6.7 Until this point estimates based on the informal knowledge of stakeholders and the experiences of fieldworkers, such as those in this study, will be the only and best source of evidence. It is recommended that the issue of housed Gypsies and Travellers is revisited in more detail in future studies of this type.

Living in bricks and mortar housing residents: findings

- 6.8 Among the 20 respondents whom we consulted who lived in bricks and mortar accommodation, 60% of bricks and mortar dwellers were social housing tenants; 25% were owner-occupiers; and 15% were private tenants.
- 6.9 In terms of the size of the dwelling, 25% of respondents had 2 bedrooms and 75% had 3 bedrooms. All but 2 respondents (10%) thought that their property gave them enough space. One of the respondents who reported needing more space said that this would be for their trailer which they currently leave at a family member's site.
- 6.10 In total, 9 households (45%) in bricks and mortar accommodation still owned trailers. Eight households had just 1 trailer and one household had 2 trailers.
- 6.11 The majority of respondents had lived in their accommodation for a significant period of time: 65% for 10 years or more; 15% had been there for between 5 and 10 years.

 Only 5% (1 household) had been in the house for less than 1 year, see Table 6.1

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¹⁹ This figure should be revised should further information become available at a later date.

Table 6.1: Length of time living in the house

Length of time	%
10 years or more	65
Between 5-10 years	15
Between 3-5 years	5
Between 1 -3 years	5
Between 6-12 months	5
Don't know	5

Base: 20 respondents

6.12 There was a range of reasons given for why people moved into the houses they were living in, see Table 6.2 below.

Table 6.2: Main reasons given for people living in the house

Reason	Number (%)
To be near family or friends	37
Born/raised in the house	16
Lack of sites	11
Health reasons	11
Other	11
Children's education	5
There was a vacancy	5
House was available to buy	5

Base: 20 respondents

- 6.13 The most common reason was that living in the house allowed them to live nearer to their family or friends. A number of people were born in the house with a number of people living in house due to some sort of health problem which was either cited as 'arthritis and asthma'. In terms of 'other' reasons one person simply stated that they 'just needed to be more settled'.
- 6.14 The majority of people who were now living in housing had previously been living on a private site with planning permission, followed by an unauthorised encampment and then a socially rented site, see Table 6.3.

Table 6.3: Prior accommodation to living in a house

Accommodation	Number (%)
Private site with planning permission	40
Unauthorised encampment	25
Transit site	15
Council site	10
Been here always	10

Base: 20 respondents

Views from site-based population of housing

6.15 A total of 23 respondents across the whole site based population (27%) had, at one time or another, lived in a house. Table 6.4 outlines how respondents rated their experience of housing. As can be seen there was a diversity of experience.

Table 6.4: Experience of living in a house

Rating	Number (%)
Very good	8
Good	21
Neither good nor poor	38
Poor	4
Very poor	29

Base: 23 respondents

6.16 When asked why they had left the house by far the most common response (in around 40% of cases) could be seen, in some way, as 'cultural aversion' or wanting to return to a travelling way of life,

"Couldn't live the way I wanted to"

"Mother wanted to return to the Traveller life"

"My kids were not with our own people, houses are not for Travellers"

"To mix back into the Gypsy community"

6.17 A large number of people (around 29% of respondents) cited 'getting married' as a major reason for leaving housing and returning to live on sites.

7. Travelling

- 7.1 In order to shed some light on the travelling patterns and experiences of Gypsies and Travellers throughout the Study Area, respondents were asked about a range of issues associated with travelling.
- 7.2 One of the most important issues to gain some information on was the frequency that households travelled. The vast majority of people reported that they never travelled or travelled seasonally, which generally means for short periods during the summer months. Table 7.1 breaks this down by accommodation type.

Table 7.1: Frequency of travelling by current accommodation type

Frequency	Unauthorised development (%)	Socially rented sites (%)	Private residential sites (perm) (%)	Private residential sites (temp) (%)	Bricks & mortar (%)
Every day or so	-	-	-	-	
Every week	-	-	-	-	-
Every month	-	-	-	-	•
Every month or so	-	-	-	-	-
Few times a year	31	22	44	57	20
Once per year	23	11	6	0	10
Never	46	67	50	43	70

Base: 86 respondents providing information

- 7.3 Generally this appears a slightly more static population than a number of other areas in which the researchers have worked where residents from all accommodation types, but particularly households on private sites and in bricks and mortar housing, appear to travel more often (e.g. Cumbria, Tees Valley, Merseyside etc.). However, it is common in GTAAs across the country (i.e. the North of England and Midlands) for large numbers of residents to report that they 'never' travel.
- 7.4 In order to determine accommodation need under the planning definition for Gypsies and Travellers (see Chapter 2) it is necessary to determine the specific reasons for why people no longer travel. We asked those who said they never travelled to tell us why, which resulted in some diverse responses. Table 7.2 looks at the proportion of people not travelling for reasons of health, education or older age

Table 7.2: Reasons given for never travelling

Reason	%
Your, a family member or a dependents health	21
Your, a family member or a dependents educational needs	40
Your, a family member or a dependents older age	21
Other reason	47

Base: 47 respondents providing information. Respondents could submit multiple responses in order to best explain their situation.

7.5 A total of 47% of respondents who reported that they 'never travelled' said that this was because of 'other' reasons. Such reasons were diverse with many people providing responses that suggest that a lack of travelling is due to a lack of sites available and/or the changing nature of the travelling way of life:

"There was nowhere to go"

"Don't want to travel anymore"

"Not the same as it was years ago, need more sites"

- 7.6 A number of other people simply described themselves as 'settled'.
- 7.7 The number of households living on temporary pitches who travel at times throughout the year was 57% of the resident households. Those households who no longer travelled for reasons of their or a dependents education, age or health needs was 21% of the resident households. Responses were checked to ensure no double counting. This indicates that 22% of households living on temporary pitches no longer travel for reasons other than those set out in the planning definition.
- 7.8 The number of households living on unauthorised developments who travel at times throughout the year was 54% of the resident households. Those households who no longer travelled for reasons of their or a dependents education, age or health needs was 39% of the resident households. This indicates that 7% of households living on unauthorised pitches no longer travel for reasons other than those set out in the planning definition.
- 7.9 For those who did travel, however, we asked them where they liked to go. This was an open question designed to allow respondents to mention three of the places they visit most frequently. The most common destination seemed to be Appleby Fair in Cumbria or a number of other traditional horse fairs across the UK. Places such as towns in the East of England (e.g. Cambridge and Harlow) as well as other parts of Kent were very common responses. It is difficult to ascertain and quantify a specific travelling pattern from these responses; however, it seems that there was a preference for remaining in the 'South' of England, with the exception of annual visits to Appleby Fair in Cumbria.
- 7.10 For those people who still travelled, there was a wide variation in how many caravans/trailers they travelled with from 1 to 3, with most people travelling with 1 or 2 caravans.
- 7.11 Of the people who said they still travel to a certain extent 86% of these had travelled at some point in the past 12 months. In terms of why they travelled, respondents cited attending fairs as the main reason followed by 'a holiday' and 'work'.

8. Future accommodation, household formation and accommodation affordability

8.1 This chapter looks at a range of issues including the movement intentions of the sample, the formation of new households and concealment of existing ones and the accommodation intentions of the Gypsy and Traveller population. These factors are key drivers in the assessment of accommodation need within the District. The findings from the survey are presented here and how this then translates into 'need' is discussed in Chapter 11.

Future accommodation intentions

8.2 The overwhelming majority of trailer based households in the area had no intention of leaving their current accommodation, see Table 8.1.

Table 8.1: Movement intentions					
Intention	Unauthorised development (%)	Socially rented sites (%)	Private residential sites (perm) (%)	Private residential sites (temp) (%)	Bricks & mortar (%)
Immediate move	0	7	0	0	5
Move in the next 12 months	0	0	0	0	0
Move in the next 1-2 years	0	0	0	0	0
Move in the next 2-5 years	0	0	0	14	5
Move in the next 5-10 years	0	4	6	0	5
Stay indefinitely	92	89	83	86	75
Other	Q	0	11	Λ	10

Table 8.1: Movement intentions

- 8.3 Only two households across the socially rented sites and one household in a house said they were going to move immediately. The following indicates the sorts of accommodation these households were seeking and their reasons:
 - One household from one of the socially rented sites was looking for another pitch on a different socially rented site in order to get better access to the doctor.
 - One household from one of the socially rented sites was looking for a house but cited 'no particular reason'.
 - One household currently in a house was looking for pitch on a socially rented site in order to rejoin their family.
- 8.4 It is thought all intended to stay within Sevenoaks. All were on a waiting list on one of the socially rented sites in the District.
- 8.5 The only other households who had any movement intentions within the next 5 years were:
 - One household on a temporary site who wanted to move in the next 2-5 years to a permanent site in order to make a profit.

 One household in a house who wanted to buy a piece of land and develop that into a site but cited 'no particular reason'.

Household concealment

8.6 A total of 3 households (4% of the sample) reported concealed households (i.e. separate households currently in need of accommodation and living with them), which equates to a total of 5 individuals. All of these were family members who were living as doubled up households on the pitches where the interviews took place. Table 8.1 below shows the composition of these households by accommodation type.

Table 8.2: Concealed households by accommodation type

Type of accommodation	Comments		
	Two households:		
	HH1. One household of 1 person – a daughter of the respondent		
Socially rented site	HH2. One household of 2 people – a 22 year old woman and her		
Socially refited site	baby		
	HH3. One household of 3 people – a 36 year old woman and her		
	two children.		

- 8.7 No households were concealed within bricks and mortar housing. From looking at these household members it is reasonable to assume that this concealment equates to an accommodation need for 3 separate households.
- 8.8 Table 8.3 below looks at how the accommodation need for these concealed households is expected to be resolved. It should be noted that all households were expected to move within the same local area as the respondents.

Table 8.3: Accommodation intentions and arrangements for each concealed household

Household (see Table 8.2 above) Intentions and arrangements being made		Potential pitch need
HH1	Probable move to bricks and mortar	Nil
HH2	Probable move to bricks and mortar	Nil
HH2	Probable move to bricks and mortar	Nil

8.9 From examining the intentions and arrangements being made there appears a nil pitch need from concealed households from respondents to the survey. However, this analysis needs to be seen alongside the advice from Kent County Council representatives about household concealment at Barnfield Park (see para 4.25). Section 11 presents a recommended approach for how these two pieces of information should be translated into need for pitches arising as a result of household concealment (p54).

Household formation

- 8.10 Respondents were also asked whether there were people living with them who were likely to want their own separate accommodation in the next five years (2012–2016). A total of 4 households (6% of sample) said that there were people living with them who would require independent accommodation within the next five-year period. This amounted to 5 individuals.²⁰
- 8.11 All of these were family members (mainly older children or children in their teens).

 Table 8.4 below shows the composition of these households by accommodation type.

Table 8.4: Household formation by accommodation type

Type of accommodation	Comments		
	Two households:		
Socially rented site	HH1.	One household member – a 13 year old son	
	HH2.	Two household members – son and a daughter	
Permanent private site	One hous	ehold:	
Permanent private site	HH3.	One household member – a daughter	
Bricks and mortar	One hous	ehold:	
DITCKS and mortal	HH4.	One household member – an 18 year old daughter	

- 8.12 Looking at these household members it is reasonable to assume that this household formation equates to an accommodation need for 5 separate households.
- 8.13 Table 8.5 below looks at how the accommodation need for these households is expected to be resolved. It should be noted that all households expected to move within the same local area as the respondents, or they reported not knowing.

Table 8.5: Accommodation intentions and arrangements for each household

Household (see Table 8.4 above)	Intentions and arrangements being made	Potential pitch need
HH1	Pitch on a socially rented site	1 pitch
HH2	Intention for both households to live on a pitch	2 pitches
HH3	Intention to live on a pitch	1 pitch
HH4	Unknown	Unknown

- 8.14 It is worth noting that HH1 reported that their son would more than likely move into bricks and mortar. This was a direct result of the lack of opportunity to access a vacant pitch on the site where they live. Furthermore, it remains unknown how the need from HH4 will be met as the respondent commented that it was 'up to their daughter' how she wanted to be accommodated and she did not know her intentions.
- 8.15 From examining the intentions and arrangements being made for these households it is reasonable to assume a pitch need of 4 pitches.
- 8.16 We are confident that we have ensured no double counting between household concealment and household formation.

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 $^{^{20}}$ We are confident there was no double counting between these different time periods.

Accommodation affordability

8.17 In order to explore issues of accommodation affordability we asked a series of related questions. The first of these looked at the ability of households, who were living on the socially rented sites, to afford a series of accommodation options, these are presented in Table 8.6.

Table 8.6: Ability to afford any of the following

Type of accommodation	% of respondents agreeing		
A pitch on a private site with planning permission	4		
A pitch on a private site without planning permission	4		
Land to be developed into a site	8		
Cannot afford to purchase land or a site	77		
Not relevant	15		

- 8.18 As can be seen very few people appeared able to afford to develop their own site based accommodation and were reliant on the provision of socially rented accommodation.
- 8.19 The next question explored how much all respondents pay per week/month in rent or mortgage for their accommodation. This information is displayed across all accommodation types in Table 8.7.

Table 8.7: Cost of rent/mortgage

Table 8.7: Cost of		-Page	-						
Type of accommodation					ion	ו			
Cost	Unauthorised Development	Socially rented site	Private site (perm)	Private site (temp)	Bricks & mortar (socially rented)	Bricks & mortar (Private rented)	Bricks & mortar (owner occupier)	Travelling Showpeople	Total
£130-255pm	0	15 (56%)	0	0	0	0	0	0	15 (17%)
£256-385pm	0	0	4 (22%)	0	1 (8%)	0	0	0	5 (6%)
£386-515pm	0	0	0	0	8 (67%)	3 (100%)	0	0	11 (13%)
£516-645pm	0	0	0	0	0	0	1 (20%)	0	1 (1%)
£646 – 775pm	0	0	0	0	0	0	0	0	0
£776-905pm	0	1 (4%)	0	0	0	0	0	0	1 (1%)
Don't know	0	9 (33%)	0	0	3 (25%)	0	0	0	12 (14%)
Prefer not to say	0	0	0	0	0	0	3 (60%)	0	3 (4%)
Don't pay rent or mortgage	13 (100%)	2 (7%)	14 (78%)	7 (100%)	0	0	1 (20%)	1 (100%)	38 (44%)

- 8.20 As this table shows, almost half the sample (44%) do not have any rental or mortgage costs. The lack of rental or mortgage costs are particularly evident in households on unauthorised developments and all private sites. Although the sample was small it appears that the rent on private rented sites was double that on the socially rented sites.
- 8.21 The next question looked at the income that each household received gross. This can be seen in Table 8.8.

Table 8.8: Income

Type of accommodation									
Cost	Unauthorised : Development	Socially rented site	Private site (perm)	Private site (temp)	Bricks & mortar (socially rented)	Bricks & mortar (Private rented)	Bricks & mortar (owner occupier)	Travelling Showpeople	Total
Under £50pw	0	1 (4%)	0	0	0	0	0	0	1 (1%)
£50-100pw	1 (8%)	2 (7%)	0	0	2 (17%)	0	0	0	5 (6%)
£101-150pw	0	6 (22%)	0	0	1 (8%)	0	0	0	7 (8%)
£151-200pw	0	3 (11%)	0	0	0	0	0	0	3 (4%)
£201-250pw	0	2 (7%)	0	0	0	0	0	0	2 (2%)
£251-300pw	0	0	0	0	0	0	0	0	0
£351-400pw	0	0	0	0	0	0	0	0	0
£401-500pw	0	0	0	0	0	0	0	0	0
£501-700pw	0	0	0	1 (14%)	0	0	0	0	1 (1%)
None	0	0	0	0	1 (8%)	0	0	0	1 (1%)
Don't know	6 (46%)	9 (33%)	9 (50%)	3 (43%)	6 (50%)	2 (67%)	2 (40%)	1 (100%)	38 (44%)
Prefer not to say	6 (46%)	4 (15%)	9 (50%)	3 (43%)	2 (17%)	1 (33%)	3 (60%)	0	28 (33%)

8.22 As can be seen most respondents either did not know (44%) or preferred not to say (33%) their household income. The findings from those who did respond are based on a sample which is too small to draw conclusions about the income of Gypsy and Traveller residents.

- 8.23 We also asked people to indicate their household savings. However, the results are uninformative as the majority either preferred not to say (60%) or reported 'none' (40%).²¹
- 8.24 In line with many other assessments of the affordable accommodation needs of Gypsies and Travellers relatively few respondents were willing to answer the specific questions relating to income. The reasons for these are complex but tend to revolve around issues of trust between the interviewer and respondent and particular privacy issues associated with Gypsy and Traveller communities. This is not atypical from other similar assessments and few conclusions should be drawn about the need for affordable accommodation or otherwise from these responses or from the significant level of pitch ownership on sites in the District.
- 8.25 It is worth noting that a diversity of socio-economic situations is present amongst the Gypsy and Traveller communities, from the moderately wealthy to very poor families. Although obtaining empirical evidence on the economic circumstances of Gypsies and Travellers is very difficult it is well established that Gypsies and Travellers are amongst the most culturally, socially, physically and financially excluded in society. A number of families will always be able to afford to purchase or rent pitches at market rates. However, in line with the rest of society, other sections of the communities will be excluded from accommodation provided at market rates and will require additional support to access safe and secure accommodation in line with their cultural needs. The absence of a range of tenure to address this diversity of socioeconomic circumstances may lead to a perpetuation and possible increase in hidden homelessness.

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²¹ Actual results are 60.5% and 39.5% but results rounded down and up respectively for comprehension purposes.

9. Travelling Showpeople

- 9.1 Within the new planning policy it is clear that the accommodation needs of Travelling Showpeople should be included within the assessments of accommodation need for 'travellers'.
- 9.2 Within Sevenoaks there is currently a single 'known' authorised private yard occupied by a Travelling Showperson in the District:
 - Mercantile, West Kingsdown. Estimated to consist of 1 plot. This yard currently has permission for 1 living unit and a mobile home.
- 9.3 This corresponds with the findings of the North West Kent Traveller Showperson Assessment which identified 1 existing pitch in Sevenoaks District on the basis of information provided by the Showmen's Guild.
- 9.4 An interview was secured with the resident on this yard. However, due to the need to protect the personal information of the individual concerned it would not be appropriate to detail their circumstances and situation here. After reviewing the completed information it is clear that there is no additional accommodation need emanating from this yard.

10. Access to health services

- 10.1 This section provides an overview of some of the health experiences of Gypsies and Travellers in the area. Issues of access to health care services and perceived barriers to access experienced by respondents are discussed below.
- 10.2 For the overwhelming majority of respondents those people who required access to healthcare services was able to access them. The exception appeared, for a minority of people, to be dental services, see Table 10.1.

Table 10.1: Access to health services

	Have access (%)	Not relevant (%)
Service		
GP/Health Centre	100	0
Health visitor	51	49
Maternity care	44	64
A&E	99	0
Dentist	90	4

10.3 Just 7% of the sample thought there was access problems, all of these respondents were from the socially rented sites in the district. A number of issues were mentioned but it was dominated by access to dental care:

"The cost of going to the dentist or getting glasses"

"It is very difficult to find a dentist in Sevenoaks, had to go to Orpington"

"There is a lack of dentists on NHS in Sevenoaks, need to attend one further away"

10.4 One person intimated about potential discrimination from healthcare providers,

"Don't like giving site address as had problems registering with the dentist, doctors

10.5 Other issues revolved around the lack of ability to travel to various healthcare services,

"We don't have our own transport - we rely on other people to take us. Bus stop is a long walk away and they are infrequent"

"Hospital is too far to go, I am asked to go to appointments but I don't go because it is too difficult to get there. Bus stop is one mile away"

10.6 People were asked to provide suggestions for how healthcare services could be improved, the following indicates the responses received.

10.7 One respondent talked about how difficult an ambulance had found it to access the site in the past,

"Ambulance access on the site is a problem. Vehicles cannot get up and down the road because of the snow and ice in winter."

10.8 Another respondent talked about experiencing unpleasant interactions with staff at the local health centre,

"The Doctor's receptionist can be very biased and rude, I don't think she likes Travellers"

10.9 However, it should be noted that a number of people reported either ambivalence or positive views towards healthcare services in the area,

"No the services are all good as I've needed them a lot. They have helped me and my family loads"

"The doctor here is really good, very helpful"

11. An assessment of accommodation need

11.1 Irrespective of the proposed change in policy targeted at resolving Gypsy and Traveller accommodation issues there are no signs that the growth in the Gypsy and Traveller population will slow significantly. Research from the Equalities and Human Rights Commission (EHRC) has indicated that around 6,000 additional pitches for Gypsies and Travellers are immediately required nationally to meet the current shortage of accommodation within England.²²

A note on the assessment of accommodation need

- 11.2 Because of the historical inequalities in pitch provision, Gypsies and Travellers have constrained choices as to where and how they would choose to live if they had real choice. So while choices for the non-Travelling community are generally much wider as there is social housing available in every authority in the country there are no local authority sites in around a third of the local authorities in England. Few local authorities have more than one socially rented site and a significant number of authorities have no authorised private sites.
- 11.3 Despite all local authorities across England completing a first round of Gypsy and Traveller Accommodation Needs Assessments (GTAAs) over the 2006-2009 period the methods of assessing and calculating the accommodation needs of Gypsies and Travellers are still developing. The model drawn upon here derives from a number of sources including:
 - The Guidance on Gypsy and Traveller Accommodation Assessments.²³
 - Guidance for Regional Planning.²⁴
 - Knowledge and experience of assumptions featuring in other GTAAs and results of EiP tests of GTAAs
 - The emerging messages arising from the recent CLG consultation document 'Planning for Travellers'.
- 11.4 In a move from the first round of GTAAs this assessment has focussed more closely on two issues, the constitution of local and historic need and the need for site based accommodation in line with the planning definition (see Chapter 2). In terms of addressing local and historic need this assessment has measured this by:

²² See Brown, P., Henning, S. and Niner, P (2010) Assessing local housing authorities' progress in meeting the accommodation needs of Gypsy and Traveller communities in England and Wales: Update 2010. Equality and Human Rights Commission.

²³ CLG (2007) *Gypsy and Traveller Accommodation Assessments* – Guidance, London: HMSO.

http://www.communities.gov.uk/pub/209/PreparingRegionalSpatialStrategyreviewsonGypsiesandTravellers byregionalplannings id1508209.pdf

- Surveying households resident in the District, as opposed to extrapolating trends and findings from households resident outside the District (i.e. which often occurs where neighbouring authorities have combined to produced joint GTAAs).
- Drawing upon empirical primary research within the District as opposed to
 developing projections based upon trends within the Caravan Count. Via a
 process of triangulation, records are brought together with survey responses on
 issues such as unauthorised sites, temporary consents and concealed households
 to develop a robust assessment of need. Similarly, an empirical assessment of
 local likely future needs is made possible via the comprehensive survey of
 households. Together these factors represent the latest position on historic
 demand.
- 11.5 In turn, the planning definition of Gypsies and Travellers as detailed in the new planning policy is operationalised by a refinement of accommodation need informed by the current mobility/nomadism of resident Gypsies and Travellers. In line with the sentiment of the definition of Gypsies and Travellers within the planning policy refinement of need is made possible by assessing the extent of travelling undertaken by households and whether travelling was no longer undertaken due to the specific reasons of needs associated with their, or a dependents, education, health or age.
- 11.6 It should be noted that the need reported as arising here is generated from households currently accommodated across a variety of accommodation types i.e. private sites, social sites and unauthorised sites. This does not entail a need for these types of tenure.
- 11.7 This study has taken a thorough assessment of the need arising from all sites (social, permanent, temporary and unauthorised) present at the time of the survey. As such this assessment of need should be regarded as a reasonable and robust assessment of need upon which to base planning decisions going forward.
- 11.8 Table 10.1 below contains the requirements for net additional pitches that need to be developed to meet the measured need. Sites given planning permission or developed through new social provision, 'genuine' vacancies on social and private sites arising in the District²⁵ occurring after the 1st October 2011 contribute to the need requirements detailed in the table below.
- 11.9 Accommodation need has been considered in this assessment by carefully exploring the following factors:

Current residential supply

- Socially rented pitches
- Private authorised pitches

-

²⁵ Such vacancies will require close monitoring.

Residential need 2012-2016

- Temporary planning permissions, which will end over the assessment period.
- Concealment of households
- Allowance for family growth over the assessment period.
- Need for authorised pitches from families on unauthorised developments.
- Movement over the assessment period between sites and housing.
- Whether the closure of any existing sites is planned
- Potential need for residential pitches in the area from families on unauthorised encampments.
- Movement between areas.
- 11.10 Site overcrowding was also considered (i.e. whether there were more living units on sites designed for less) but there was no strong evidence that sites are overcrowded in this way to any great extent that requires additional pitches to be provided. Pitch overcrowding (i.e. more households occupying a single living area than they are designed for) is addressed within the consideration of household concealment.

Additional supply, 2012–2016

With the exception of a vacant pitch on one of the socially rented sites at the time of the assessment the supply of pitches between 2012–2016 has been considered but concluded to be nil. The supply of pitches within the District should be closely monitored. New mechanisms may be required to enable this. A number of factors are potential sources of supply:

- Pitches currently closed but re-entering use
- New sites planned
- Vacant pitches
- 11.11 The requirements are presented in summary form in Table 11.1 below. Table 11.1 details the accommodation and pitch need, derived from applying the definition as used in the Housing Act and the Planning definition. The housing definition is considered to illustrate overall accommodation need for the District. The planning definition refines the above need in order to illustrate the need for site-based accommodation. Each element is explained in greater detail below. All figures relate to pitches not sites.

Table 11.1: Summary of Gypsy and Traveller accommodation and pitch need (2012-2026)

	11.1. Summary of Gypsy and Traveller accommod	Column 1	Column 2		
	Element of supply and need	Accommodation Need/Supply Total (households)	Pitch Need/Supply Total (pitches): Application of Planning Definition		
	Current residential supply				
1	Socially rented pitches	58	58		
2	Private authorised pitches	30	30		
3	Total authorised Gypsy and Traveller pitches	88	88		
	Residential pitch need, 2012–2016				
4	End of temporary planning permissions	14	11		
5	Concealed households	5	5		
6	New household formation	6	6		
7	Unauthorised developments	21	20		
8	Net Movement from housing to sites	0	0		
9	Closure of sites	0	0		
10	Unauthorised encampments	0	0		
11	Movement between areas	0	0		
12	Residential pitch need (2012–2016)	45	41		
13	Supply (2012-2016)	1	1		
14	Residential pitch need (2012-2016)	44	40		
15	Residential pitch need (2017–2021)	16	15		
16	Residential pitch need (2022–2026)	18	17		
17	Total Residential pitch need (2012–2026)	78	72		

Note: For pragmatic reasons these figures have been rounded up to the nearest whole pitch for further details please see Table A5 in Appendix 5.

Explanation of the need requirement elements

Current residential supply

- 11.12 **Row 1:** The number of pitches on socially rented sites provided by local authority information.
- 11.13 **Row 2:** The number of pitches on private authorised sites provided by local authority information.
- 11.14 **Row 3:** The total number of authorised pitches within the district.

Residential pitch need 2012-2016

11.15 **Row 4:** The number of pitches which have temporary planning permission due to expire within the assessment period. Column 1 of Table 11.1 details the number of pitches with temporary planning permission in the district ending within the assessment period. Column 2 of Table 11.1 details the number of pitches with temporary planning permission in the district ending within the assessment period, where residents are estimated to meet the need for site-based accommodation under the planning definition.

Households on private sites with temporary planning permission meeting the planning definition

Applying the planning definition to households within the district was made possible by assessing the extent of travelling undertaken by households and the reasons for not travelling where households were sedentary.

Column 1 of Table 11.1 presents the actual number of households currently residing on pitches with temporary planning permission which will end within the assessment period. Column 2 of Table 11.1 applies findings from the survey which detail the extent of travelling undertaken by these households. The findings and calculation are as follows.

Finding: The number of households living on temporary pitches who travel at times throughout the year was 57% of the resident households. Those households who no longer travelled for reasons of their or a dependents education, age or health needs was 21% of the resident households. Responses were checked to ensure no double counting.

Calculation: 78% on a base population of 14 pitches with temporary planning permission = 11 households who meet the Planning definition.

11.16 **Row 5**: This details the number of concealed households occupying existing accommodation who require independent accommodation within the district. A total of 6 households require site based accommodation due to being concealed.

Concealed households across accommodation types requiring site based accommodation

Finding: The analysis of the survey showed that there were no households on sites or bricks and mortar housing that required site-based accommodation. However, information from Kent County Council indicated that there were 6 households who were currently doubled up on one of the socially rented sites who required independent accommodation in the district. All these households were independent households with children living on the pitches of their parents/families.

Assumptions:

- It is likely that these 6 households will form and demand independent accommodation so no pitch sharing adjustment has been made.
- As one interview was conducted with a household who was doubled-up on this site it is possible that the survey has already accounted for the needs of this households. The households reported that they were likely to move into bricks and mortar accommodation (see Row 6 & 11.17 below). Adjustment is needed to exclude the possibility of double-counting.
- All remaining households have been identified as needing site-based accommodation on the socially rented site they current inhabit.

Calculation: 6 households minus 1 potential move into housing = 5 concealed households.

11.17 **Row 6:** This is the number of new pitches required from new household formation.

Pitch requirement from new households forming

Finding: Drawing upon the information contained within Chapter 8, the analysis of the survey showed that there were 6 households likely to require pitch based accommodation in the district in the next 5 years from authorised sites. There were no households expected to form and require pitch based accommodation from bricks and mortar housing, unauthorised developments and temporary private sites.

Assumptions: It is unlikely that all households will form and demand independent accommodation. A ratio of pitch sharing has been assumed at a rate of 1:075 as advocated in the incomplete Inspector's Report for the South East Plan Partial Review.

Calculation:

- Authorised private sites (permanent) 1 household was identified in the survey that required independent site based accommodation. Applying the pitch sharing ratio equates to 1 new household which is the equivalent to 6% of the sample on private sites. This is then grossed to the whole population of households on permanent private sites = 2 households
- Socially rented sites 3 households were identified in the survey that
 required independent site based accommodation. Applying the pitch
 sharing ratio equates to 2 new households which is the equivalent to 7% of
 the sample on socially rented sites. This is then grossed to the whole
 population of households on permanent private sites = 4 households

11.18 **Row 7:** This is the level of need arising from current unauthorised developments. Column 1 of Table 11.1 details the number of pitches on unauthorised developments within the district. Column 2 of Table 11.1 details the number of pitches on unauthorised developments where the residents are estimated to meet the need for site-based accommodation under the planning definition.

Households on pitches on unauthorised developments meeting the planning definition

Applying the planning definition to households within the District was made possible by assessing the extent of travelling undertaken by households and the reasons for not travelling where households were sedentary.

Column 1 of Table 11.1 presents the actual number of households currently residing on unauthorised developments. Since these sites are, by definition, unauthorised, these households are in need of authorised, legal accommodation, whether through the granting of planning permission, the provision of other accommodation options or the provision of accommodation elsewhere. Column 2 of Table 11.1 applies findings from the survey which detail the extent of travelling undertaken by these households. The findings and calculation are as follows.

Finding: The number of households living on unauthorised developments who travel at times throughout the year was 54% of the resident households. Those households who no longer travelled for reasons of their or a dependents education, age or health needs was 39% of the resident households. Responses were checked to ensure no double counting.

Calculation: 93% on a base population of 21 unauthorised pitches = 20 households who meet the Planning definition

11.19 Row 8: This is the estimation of the flow from sites to houses and vice versa.

Movement between housing and sites

Movement from sites to housing finding: Only 1 site based household expressed a firm intention to move into bricks and mortar accommodation. This is the equivalent of 2% of the total site based sample.

Calculation: 2% of the total site based population present at the time of the study = 2 households who will move from sites to housing over the assessment period

Movement from housing to sites finding: Only 1 respondent in bricks and mortar accommodation had firm intentions to move from their house on a site. This is the equivalent of 5% of the bricks and mortar sample.

Calculation: 5% of the estimated bricks and mortar population = 2 households who will move from housing to sites over the assessment period.

Net movement from housing to sites = 0

- 11.20 **Row 9:** Plans to close existing sites, which have been calculated within the supply of site accommodation, will ultimately displace a number of Gypsies and Travellers resulting in an increase in housing need. It is the understanding of the project team that there was no intention to close any residential site in the district.
- 11.21 **Row 10:** This provides an estimation of the need arising from households on unauthorised encampments. This factor takes into account households involved in unauthorised encampments that require a residential pitch in the Study Area. The Caravan Count records and records collected by Kent County Council indicate low to nil levels of unauthorised encampments in the district. The survey team saw no primary evidence of unauthorised encampments during the fieldwork. This assessment has not found any need for residential accommodation from households on unauthorised encampments. ²⁶
- 11.22 **Row 11:** This is the level of movement of households between areas. The survey found no evidence to suggest that there is movement between areas. It is assumed that if movement does occur in-migration will balance out migration
- 11.23 **Row 12:** This is the total gross residential need for pitches arising in the district between 2012-2016
- 11.24 **Row 13:** At the time of the survey there was 1 vacancy on one of the socially rented sites. This is the only supply element included in this assessment.
- 11.25 **Row 14:** The total net requirement for pitches in the district over the period 2012–2016.

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²⁶ This should remain under close review by the agencies responsible.

Permanent residential accommodation need over 2017-2021 and 2022-2026

- 11.26 The current shortage of sites and pitches for Gypsies and Travellers means that it is difficult to predict trends in living arrangements until the current lack of pitch based accommodation has been addressed at a national level. There is no means of knowing how Gypsies and Travellers will decide to live in the next decade. There may be an increase in smaller households, moves into bricks and mortar housing may be more common or household formation may happen at a later age.
- 11.27 However, it is necessary to plan for the long term and anticipate pitch need from Gypsy and Traveller households. In order to tackle the complexity of needs that may well occur over the next decade it is established practice in assessment of Gypsy and Traveller accommodation need to apply an assumed rate of household growth. It has been common in similar studies to employ a standard 3% per annum compound rate of household growth. In order to produce a more locally responsive assessment this study considered the local household formation rate (based on predicted household growth 2012-2016) and found this to be 1.25% per annum compound. This is significantly lower than is found elsewhere. It should be noted that Table A2.4 outlines a significant number of children that will have reached an age where households are typically formed in Gypsy/Traveller families (i.e. 18-21 years) during the period to 2026. Although it appears that there seems to be a preference from some households for bricks and mortar accommodation, for their children, or incorporation within existing space this may not be a sustained trend. Taking these issues into consideration the 3% household growth rate has been employed. This figure is then applied, minus an assumed ratio for pitch sharing of 1:0.75, to the projected number of pitches which should be available by 2016. All household growth is assumed to require a site-based solution. This study does not allow for unauthorised developments over the next periods (2017 – 2021 and 2022 – 2026) because the factors which will contribute to future need have been clearly identified and measured as part of the study. The supply of pitches over the 2017–2026 period has been considered but has been assumed to be zero. This is consistent with earlier GTAAs and implicitly compensates for not taking into account needs arising from drivers other than family growth. It is recommended that the rate of household growth is kept under review.
- 11.28 **Row 15**: The total requirement for pitches in the district over the period 2017-2021.
- 11.29 **Row 16**: The total requirement for pitches in the district over the period 2022-2026.
- 11.30 **Row 17:** The total requirement for pitches in the district over the period 2012-2026.

In summary

- 11.31 Analysis of data has shown that accommodation need will arise from the following factors:
 - The ending of temporary planning permissions
 - Concealed/doubled-up households in the area
 - New households due to form
 - Unauthorised developments

This analysis has shown that there is an accommodation need for **78 households** over the 2012-2026 period. However, when an adjustment is made to account for the use of the planning definition to assess accommodation needs there is a **pitch need for 72 households**. These figures incorporate a household growth rate of 3% a year compound as applied to all current site based households in the area and all future households that should be accommodated on pitches by 2016 to estimate need in the period 2017-2026.

12. An assessment of need for transit accommodation

12.1 Although to a certain extent nomadism and travelling are currently restricted by a lack of sites nationally, this remains an important feature of Gypsy and Traveller identity and way of life, even if only to visit fairs or visit family. Some Gypsies and Travellers are still highly mobile without a permanent base, and others travel for significant parts of the year from a winter base. More Gypsies and Travellers might travel if it were possible to find places to stop without the threat of constant eviction. Nationally the worst living conditions are commonly experienced by Gypsies and Travellers living on unauthorised encampments who do not have easy access to water or toilet facilities and have difficulties in accessing education and health services.

Need for Transit Sites and Stopping Places

- 12.2 National policy is clear that there should be provision in order for Gypsies and Travellers who choose to travel to do so without resorting to stopping illegally or inappropriately.
- 12.3 We found no clear evidence of the need for transit provision as a result of unauthorised encampments in the District. It appears that some transit need is currently being catered for by site-based households resident in the area who allow their families and friends to stay with them for short periods at various times throughout the year. No one mentioned accommodating visitors as being a problem except households on socially rented sites, who reported requiring permission from the site manager.
- 12.4 This assessment would support the approach of creating a network of transit facilities across Kent and the wider region to accommodate short term accommodation requirements. Such an approach is discussed in a regional study on transit need produced in 2009.²⁷
- 12.5 There are a number of issues to note when considering the provision of transit accommodation:
 - The geographic nature of the area the provision of one transit site may not provide for need across the different areas of the District.
 - A single transit site would force the mixing of differing groups (family and ethnic) and could lead to potential tensions.
 - The needs of the travelling groups often combines a mixture of motivations (i.e. work, family and holiday). A uniform transit site may not meet the differing requirements.
 - Larger pitches on residential sites, or larger number of pitches on sites, provide
 the potential to meet the needs of short-term visitors and 'future-proof' against
 an increase in unauthorised encampments.

²⁷ South East England Regional Gypsy and Traveller Transit Study, Final Report, Pat Niner, University of Birmingham, October 2009

- 12.6 Although transit need could be met by the creation of 'hard' purpose-made pitches/sites, it is also recommended that consideration is also given to the need for the development of such 'hard' pitches with the possibility of 'soft' transit pitches (i.e. designated stopping places). Such 'softer' options would provide Gypsies and Travellers with somewhere authorised and more secure to stop whilst creating a minimal environmental impact. Such stopping places are often favoured by Gypsy and Traveller households.
- 12.7 Requirements for provision of future transit accommodation are impossible to predict from this survey. Additional provision would only be required if the level of travelling were to increase markedly. This underlines the general importance of monitoring and reviewing travelling patterns and the incidence of transient unauthorised encampments regularly, and re-assessing provision usage and requirements.

13. Concluding comments

- 13.1 This final chapter contains some concluding comments which aim to help Sevenoaks District Council in understanding how the need arising within the District may best be met.
- 13.2 The Gypsy and Traveller population appears relatively stable with few incidents of unauthorised encampments, as need for short-term stays is apparently met by residential sites, and relatively few incidents of new unauthorised development of sites. This means that the accommodation need is arising, in the main, from Gypsy and Traveller residents of the District as opposed to those from outside the area.
- 13.3 It is worth noting that the need assessed in the original GTAA was not fully met, as sites were typically granted temporary consent, and that need has rolled over into this GTAA. In order to reduce need over the next period there should be a preference of granting permanent permission in order to reduce uncertainty and costs associated with precarious planning situations.
- 13.4 It is possible that a significant proportion of the accommodation need within the District can met in the first five years (2012-2016) by regularising the existing sites without permanent planning permissions, where these sites are considered to be acceptable. Table 13.1 outlines the scenarios of providing permanent planning permission to all temporary pitches sites meeting the planning definition (11 pitches) and pitches on unauthorised developments meeting the planning definition (20 pitches)

Table 13.1: Scenarios for meeting need by regularising temporary and unauthorised pitches

	Remaining need 2012-2016
Total pitch need 2012-2016	40
If permanent planning permission is granted to the 11 pitches with temporary permission seen to meet the planning definition (see Ch 11)	29
If permanent planning permission is granted to the 11 pitches with temporary permission seen to meet the planning definition and the 20 pitches on unauthorised developments seen to meet the planning definition (see Ch 11)	9

- 13.5 As Table 13.1 shows the vast majority of need for the period 2012-2016 could be met without any further investment in site provision by the regularising of existing pitches. However, this will require the assessment of existing temporary and unauthorised sites to determine whether they are appropriate locations for permanent Gypsy and Traveller accommodation. It should be noted that the Council should take steps to address the provision of affordable accommodation for those who require it.
- 13.6 It is the understanding of the authors that some of the overcrowding on one of the socially rented sites (Barnfield Park) could be alleviated by further investment leading to remodelling of the site. It is the view of the authors that this should be considered a priority, in order to address the accommodation conditions of existing residents, alongside the provision of new pitches elsewhere.

- 13.7 There appears a nil need from Travelling Showpeople from households living within the District. However, it should be noted that Travelling Showpeople remain distinct from Gypsies and Travellers and further work may need to be produced, across local authority boundaries, to accurately understand their accommodation needs.
- 13.8 Although the pitch requirements over the 2012-2016 period should be seen as accurate as a result of utilising the best information available at the time of the study, pitch requirements for the 2017-2026 period should be seen as indicative due to the reliance on household growth figures. It is recommended that this assessment of accommodation need is repeated in due course (circa 5 years) to ensure this assessment remains as accurate as possible.
- 13.9 There is no apparent need for transit provision in any formal sense, as short-term visitors appear to be accommodated by households on residential sites. This should be monitored. Similarly, in order to 'future-proof' for need from visitors to the area consideration should be given to ensuring the provision of short-stay pitches is embedded within the permission granted for residential pitch accommodation.
- 13.10 The long term accommodation needs arising from Gypsy and Traveller households in bricks and mortar accommodation continue to be largely unknown. Although this assessment has been successful in including the needs of this group it is not known how representative these findings are across the entire population who live in houses. More work needs to take place around estimating the size of the housed population and monitoring their accommodation need. Some of this may be made possible as a result of findings from Census 2011 which included the ethnicities of Romany Gypsy and Irish Traveller.
- 13.11 Finally, it is imperative that progress is made to address the needs identified in this assessment. If no or little progress is made in meeting the accommodation needs of Gypsies and Travellers in the District it is likely that this would involve:
 - No additional public site/pitch provision. Pitches on existing public and private sites would only come available through current natural turnover and these would then be let according to current allocation policies and practices;
 - Receiving applications for the development of private Gypsy or Traveller sites.
 The national trend indicates that these will often be unsuccessful (around 60% of the time). It is likely that these will stimulate long processes of refusals, enforcement, appeals and inquiries; and,
 - A continuation, and possible increase, in the number of unauthorised developments occurring across the District

13.12 The implications of this are that:

- The various needs that have been identified during the course of this assessment will not be met;
- Households which are currently concealed and new households which are forming will not be able to locate in appropriate accommodation across the District;

- The legal and other costs of accommodating or removing unauthorised sites will continue and may increase;
- The Council fail to meet the requirements of both the Housing Act 2004 and national planning policy, which outline the requirement for plans to be developed in order to meet the accommodation needs of Gypsies and Travellers.
- Greater conflict between the settled and Gypsy and Traveller populations as a result of unauthorised development in inappropriate areas.
- 13.13 Engaging with a broad array of partners will be essential in order to move Gypsy, Traveller and Travelling Showpeople accommodation provision forward. Effective partnership working should be developed with:
 - internal staff and departments within the local authority to ensure a joined-up approach;
 - elected members;
 - adjacent local authorities;
 - Homes and Communities Agency;
 - key stakeholders including health, education and training, police and residential social landlords;
 - Gypsies and Travellers (including the Showmen's Guild); and,
 - The general public more widely
- 13.14 Only via effective partnership working can the accommodation needs identified here be addressed and have the best opportunity for long-term success.
- 13.15 It should be noted that the need identified in this assessment does not arise from people from elsewhere but from the existing residents of Sevenoaks. Addressing the accommodation needs of Gypsies, Travellers and Travelling Showpeople is the shortest and quickest route to helping to ensure positive outcomes for members of this population. Research has shown that a lack of suitable accommodation and poor conditions is related to poor educational and health as well as being at the root of ill feeling between the general non-Traveller community and Gypsies and Travellers. In addition, addressing accommodation will in the short and long-term reduce the costs of maintaining the process that surrounds unauthorised encampments and developments and help achieve additional revenue where socially rented sites are developed. Permanent solutions will offer the best chance for positive outcomes for all concerned and create a platform where greater engagement and cohesion can be fostered and developed throughout the District.

Appendix 1: The assessment methodology

Draft practice guidance for local authorities undertaking Gypsy and Traveller Accommodation Assessments was released by the ODPM (now CLG) in February 2006 with final guidance made available in October 2007. Specialised guidance and assessments were felt to be required as many local authority housing needs assessments were previously failing to assess or identify the needs of Gypsies and Travellers. The Guidance explains why assessments are needed, how authorities might go about conducting an assessment and issues to consider. The Guidance is non-prescriptive in terms of methods but suggests that Gypsy and Traveller Accommodation Assessments integrate a wide variety of evidence such as existing secondary information, views of selected stakeholders and the views of Gypsies, Travellers and Travelling Showpeople.

It is noted that the recent draft Planning Policy Statement 'Planning for traveller sites' (CLG, 2011) has proposed removing the need for dedicated Gypsy and Traveller Accommodation Needs Assessments (GTAAs) from any new guidance. It states,

While the Government is keen that planning policy highlights the importance of ensuring that targets are based on robust evidence, it does not consider it necessary to prescribe to local planning authorities the type and volume of evidence required, especially as their conclusions will be tested through the process of consultation and Examination in Public of local plans. This also accords with the Government's "streamlining" objectives by removing policy that is already adequately covered by legislation. The proposed policy states that local planning authorities set their own evidence-based targets for the provision of pitches/plots. The policy does not dictate what targets local planning authorities should adopt. This is a matter for local planning authorities to decide themselves depending on the circumstances in their particular area.

However, in the absence of alternative methodologies for assessing the accommodation needs of Gypsies and Travellers we have adopted a modified survey of the sort used in the first round of GTAAs.

This assessment was undertaken in two distinct stages. Each of these stages is described in more detail below.

- Stage one collation and review of existing information
- Stage two survey with Gypsies and Travellers across the Study Area.

Stage One: Collation and review of existing secondary information

This first stage comprised a review of the available literature and secondary sources obtained from government (central and local) and regional and community bodies. This provided an historical, social and political overview to the situation of Gypsies and Travellers in the Study Area. More specifically this included the collection, review and synthesis of:

- The bi-annual Count of Gypsy and Traveller Caravans.
- Records and data maintained and provided by the local authority and the County Council

Stage Two: Survey with Gypsies and Travellers

One of the most important aspects of the assessment was consulting with local Gypsies, Travellers and Travelling Showpeople; the fieldwork took place between October and December 2011. These consultations took the form of face-to-face interviews in order to gather information about their characteristics, experiences, accommodation and related needs and aspirations. The survey with Gypsies and Travellers is discussed below under three sections: sampling strategy and response rates; questionnaire design; and fieldwork and interviewers.

Sampling and response rates

Sampling Gypsy and Traveller households for Gypsy and Traveller Accommodation Assessments is always problematic given the absence of accurate information concerning the size and location of the Travelling communities. As such the sampling technique for the assessment was purposive rather than purely random. The sampling strategy for the assessment differed depending upon the particular accommodation type currently inhabited by Gypsies, Travellers and Travelling Showpeople in the Study Area.²⁸

- For households on the socially rented sites, authorised private sites and unauthorised developments we compiled a sample frame from information provided by the local authority. We set an aspirational quota for the interviews of 50% of the occupied pitches on these sites. Repeat visits were made to locations in order to achieve interviews if households were away from the site, it was not convenient for the household in question or the fieldworkers ran out of time.
- For households on unauthorised encampments, officers were encouraged to inform
 the fieldwork team when and where encampments occurred during the fieldwork
 period. Fieldwork team members also sought to utilise their own contacts to trace
 any unauthorised sites. There were no unauthorised encampments reported to the
 team during the fieldwork period and none were found. From looking at the Caravan
 Count and from discussions with stakeholders it appears that the low number of
 encampments is reflective of the current trend.
- As the population of Gypsies and Travellers in bricks and mortar housing is relatively hidden from official records there was no sample frame from which to identify people. Therefore, in order to engage with housed Gypsies and Travellers the fieldwork team relied on three main methods: contacts of Gypsies and Travellers who had already been interviewed as part of the assessment; the contacts of the Gypsy and Traveller Community Interviewers on the fieldwork team; and contacts provided by stakeholders.
- Contact with Travelling Showpeople was made possible by information held by the local authority as to the whereabouts of yards as well as links provided by the local section of the Showmen's Guild.

²⁸ Such a sampling strategy coupled with the lack of knowledge about the overall size of the Gypsy and Traveller population means that discussing statistical issues such as sampling error and confidence intervals would be misleading.

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A total of 86 households were involved in the assessment within the district.

Table A1.1 below illustrates how the assessment sample relates to the known number of pitches and estimated population by accommodation type. As can be seen, we endeavoured to include all known sites in the Study. To be clear Table A1.2 reflects achieved household interviews. This represents the households who opted to participate in the study rather than the number of households approached. Anecdotally, households on temporary sites often tend to perceive, when asked, that they no longer have any accommodation needs, with households on unauthorised developments often wary of participating in a survey such as this in case participation complicated, or was detrimental to, their planning application (despite the researchers explaining that it was in no way linked to their application). However, we would not advocate taking these reasons as proxies for having no household need due to the level of suspicion in the communities around surveys of this nature. We therefore believe that the sample is as representative as can be reasonably expected.

Table A1.1: Sample in relation to local Gypsy and Traveller population

Type of accommodation		No. of sites	5	No. of known occupied pitches/households		
	Total	Sample	%	Total	Sample	%
Socially rented sites	3	3	100	57	27	47
Residential private authorised pitches (permanent)	11	7	64	30	18	60
Residential private authorised pitches (temporary)	7	7	100	14	7	50
Unauthorised developments	8	7	88	21	13	62
Unauthorised encampments	NA	NA	NA	NA	NA	NA
Housed	NA	NA	NA	NA	20	NA
Authorised Travelling Showpeople yards	1	1	100	1	1	100

In terms of the gender split between interviewees, we spoke to 12 men (14%) and 74 women (86%). This reflects a commonly achieved gender distribution in GTAAs.

On a base population of 163 households we consulted with 86 resident households, 53% of the estimated resident Gypsy and Traveller community across the Study Area. We believe that as the sample included a range of accommodation types and household circumstances we have no reason to believe that those households included in the survey are untypical from the total population in the area. Overall, we believe that the findings for the assessment are based on reliable information from accommodation types within the Study Area.

Questionnaire design

All household interviews have utilised a structured questionnaire upon which questions were routed according to the appropriate accommodation type. Questions were a mixture of tick-box answers and open-ended questions. This mixed approach enabled us to gather quantifiable information, but also allowed for contextualisation and qualification by the more narrative responses. The survey contained the following sections:

- Current accommodation;
- Local and historic connection;
- Travelling;

- Previous housing experiences;
- Household details;
- Health services; and
- Future accommodation.

The questionnaire used in the assessment is available in Appendix 4.

Fieldwork and interviewers

In addition to SHUSU fieldwork staff, and of crucial importance to engaging as effectively as possible with the Gypsy and Traveller population, was the involvement of Gypsy and Traveller Community Interviewers. In total, two members of the Gypsy and Traveller community were involved in the assessment as Community Interviewers. These interviewers had worked previously with SHUSU and were of Romany Gypsy background and lived outside the area.

Each interviewer took part in refresher training, prior to commencing fieldwork, and provided with support from the core study team members during their interviewing activity. Each questionnaire which was returned to us was subject to quality control and appropriate feedback was given to the interviewers. By taking this approach we found we were able to access a range of people that would not otherwise have been included in the assessment, such as 'hidden' members of the community (older people or people living in bricks and mortar housing), and those people who were uncomfortable talking to non-Travellers.

Appendix 2: Demographics of the local Gypsy and Traveller population

This section aims to provide some information on the demographics of the sample involved in this accommodation assessment within the Study Area.

Demographic and household characteristics

Characteristics of Gypsy and Traveller communities are often hidden or not widely known. Gypsy and Traveller Accommodation Assessments present an ideal opportunity to get to know more about the community at large, particularly in terms of living circumstances, age, Gypsy and Traveller groups and household composition. The following aims to provide some information about the composition of Gypsy and Traveller households in the sample.

Age of interviewees

The age profile of the sample can be seen from Table A2.1. The 25–39 age group was the most consulted during the assessment, forming 31% of the total sample. This was followed by the 40–49 age group (26%) and then the 18-24 age group (14%). A total of 17% of the sample were aged 60 years and over.

Table A2.1: Age of interviewees

Age Group	No.	%
18–24	12	14
25–39	27	31
40–49	22	26
50–59	10	12
60–64	10	12
65–74	3	4
75-84	1	1
Total	85	

Base: 85 respondents providing information

Household size

In total, the survey sample accounts for 284 members of the Gypsy and Traveller community in the Study Area. The average household size for the whole sample is 3.4 – larger than the household size of the non-Traveller population. However, this hides a range in household sizes as indicated in Table A2.2 below.

Table A2.2: Household size distribution

Household Size	No.	%
1 Person	9	11
2 Persons	18	21
3 Persons	15	17
4 Persons	26	30
5 Persons	12	14
6 Persons	5	6
Total people	284	

Base: 85 respondents providing information

There was very little variation in the size of households in relation to their current accommodation type. As can be seen from Table A2.3, respondents living on the most precarious sites (private sites with temporary planning permission and unauthorised developments) tended to have the largest households.

Table A2.3: Average household size by accommodation type

Accommodation type	Average household size
Residential private sites (Temp)	3.6
Unauthorised developments	3.5
Residential private sites (Perm)	3.2
Bricks and Mortar	3.2
Socially rented sites	3
Travelling Showpeople	1

Base: 85 respondents providing information

In order to consider household growth the number of children of different age cohorts were analysed. This can be seen as recorded in the survey and then grossed to the known population across accommodation types in Table A2.4.

Table A2.4: Number of children in households by accommodation type

	Unauth develo	norised pment		ially d sites	sit	/ate	sit	ate	Bricl Mo			elling people	То	tal
	Actual	Grossed	Actual	Grossed	Actual	Grossed	Actual	Grossed	Actual	Grossed	Actual	Grossed	Actual	Grossed
Children 0-4	5	8	20	42	4	8	4	7	0	0	0	0	33	65
Children 5-10	10	16	9	19	2	4	6	10	17	34	0	0	44	83
Children 11-16	4	7	8	17	2	4	6	10	12	24	0	0	32	62

Base: 86 respondents providing information

Gypsy and Traveller groups

The largest single group was Romany/Gypsy (78%), followed by smaller numbers of Irish Travellers (5%), Other (2%) and Traveller (not specified) (1%).

Table A2.5: Interviewees by Gypsy and Traveller group

Gypsy and Traveller groups	No. of households	%
Romany/Gypsy (English)	78	91
Irish Traveller	5	6
Other	2	2
Traveller (not specified)	1	1
Total	86	

Base: 86 respondents providing information

Appendix 3: Authorised sites with planning permission and unauthorised developments

Socially rented sites

Table A3.1: Socially rented sites

Site	No. of pitches
Hever Road	16
Polhill	7
Barnfield Park	35
Total	58

Authorised sites with permanent planning permission

Table A3.2: Authorised private sites with permanent planning consent

Site	Estimated No. of pitches
Early Autumn, West Kingsdown	2
Valley Park, Hextable	17
Eagle's Farm, West Kingsdown	2
Macandy, Knatts Valley	1
The Oaks Farm, Knockholt	1
Greenvale, West Kingsdown	1
Two Barnes, West Kingsdown	1
The Old Piggery, Knatts Valley	1
Pembroke House, Swanley	1
Park Lane, Swanley Village	2
72 Lower Road, Hextable	1
Total	30

Authorised sites with temporary planning permission

Table A3.3: Authorised private sites with temporary planning consent

Site	Estimated No. of pitches	Planning consent dates
Eagle's Farm, West Kingsdown	2	Granted 20/02/08 expires February 2013
Land SW Broomhill, Swanley	2	Granted 11/12/08 expires December 2012
Bournewood Brickworks, Crockenhill	1	Granted 13/01/09 expires January 2012
Robertson's Nursery, Swanley	1	Granted 24/07/09 expires July 2012
Seven Acre Farm, Edenbridge	6	Granted 17/09/10 expires September 2013
Hollywood Gardens, West Kingsdown	1	Granted 18/05/10 expires May 2013
The Mobile Home, Hextable	1	Granted 28/10/10 expires October 2013
Total	14	

Unauthorised developments

Table A3.4: Unauthorised developments

Site	Est pitches/ households
Knockholt Station, Halstead *	6
Land south of déjà vu, Swanley *	3
Brands Hatch Garage, Fawkham~	1
Fordwood Farm, Ash	1
Hill Top Farm, Farningham	5
Hopgarden Farm, Otford	1
Plot 4, South Darenth	1
St George's Stable, Well Hill~	3
Total	21

^{*} Further temporary planning permissions granted on these sites following the completion of the household survey by permissions SE/11/01510 and SE/11/02120, respectively \sim Sites have now been vacated.

Appendix 4: Questionnaire

Maidstone & Sevenoaks Gypsy, Traveller and Showpeople Study Site Accommodation Questionnaire

Introduction

My name is [] and I work for the University of Salford in Manchester [show badge]. We have been asked by the local authority [Maidstone or Sevenoaks] to see what sort of accommodation Gypsies, Travellers and Showpeople need locally. We want to be sure that we understand what people need. We're looking to speak with a number of people staying in the local area, in houses, on council sites, on private sites and on the roadside, to get a range of views. The views that we collect may help plan and improve accommodation, sites, planning and other services in the future.

We are completely independent of any local council or the government. Would you be willing to talk to me? If you agree it will probably about 25 minutes. I have a number of questions I would like to ask but I would like to hear about anything else you feel is relevant. I will be writing down your answers but the interview will be confidential and no one will be identified in any report that we write, and there is no way that anyone will be able to trace any particular answer back to you.

Would you be willing to talk to me? If it's not a good time I could arrange to come back later if that suits you better.

CHECK! Have you already been interviewed for this survey before? Do you have one of these (show pink sheet)?

Site ref number:	
Local authority:	
Address/Site:	
Date of Interview:	
Date of interview.	
Interviewer name:	

If, during the interview a question comes up that you don't want to answer just say so and I'll move on

SECTION A: CURRENT ACCOMMODATION

The first set of questions is about where you are living at present and your views about it. Can I ask you first about the living accommodation you have for yourself and your family?

QA1.	Type of accommodation. (Pleas	e tick ✓ one box only)	
	Unauthorised encampment		☐ Go to QA5
	Unauthorised development (own	land no planning)	☐ Go to QA4
	Residential Council/site/yard		☐ Go to QA4
	Residential Private site/yard with	☐ Go to QA3	
	Residential Private site/yard with	temporary planning permission	☐ Go to QA4
	Bricks & Mortar (rented from the	local authority or social landlord)	☐ Go to QA2
	Bricks & Mortar (rented from a pr	☐ Go to QA2	
	Bricks & Mortar (owner occupier)		☐ Go to QA2
	Other (please specify below)		☐ Go to QA4
QA2.	How many bedrooms do you have	ve here? (Please tick ✓ one box or	nly)
	One	☐ Go to QA6	
	Two	☐ Go to QA6	
	Three	☐ Go to QA6	
	Four or more	☐ Go to QA6	
QA3.	Is the permission 'personal' i.e. for	or you and your family only? (Pleas	e tick ✓ one box only)
	Yes	☐ Go to QA4	
	No	☐ Go to QA4	
	Don't know	☐ Go to QA4	
QA4.	Do you? (Please tick ✓ one bo	x only)	
	Own your plot/pitch	☐ Go to QA5	
	Rent your plot/pitch	☐ Go to QA5	
	Other (please specify below)	☐ Go to QA5	
	Don't know	 ☐ Go to QA5	

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QA5.	Do yo	u? (Please tick ✓ one	e box c	only)			
	Own y	our trailer/chalets/units/	3				
	Rent y	our trailer/chalets/units	3				
	Other	(please specify below)					
	Don't	know			_		
QA6.	How r	many trailers/chalets/ur	nits	(Please writ	te in spaces	provided)	
	a.	Do you have in total?					
	b.	Are used as sleeping	space	s?			
	C.	c. Are used as living spaces (non sleeping)?					
	d.	Trailers are used mai	inly for	storage/occasio	onal use?		
QA7.	pitch?	d you say you have end (Please tick ✓ one l viewer: this relates no	box on	ly)		current size in this hor	ne /
	Yes			☐ Go to QA	9		
	No			☐ Go to QA	8		
	Don't	know		☐ Go to QA	9		
QA8.	Do yo	u feel that you need?	(Pleas	se tick √ all tha	at apply)		
	A larg	er site/yard					
	A larg	er pitch/plot					
	More	caravans/trailers/units					
	Large	r caravans/trailers/units	8				
	More	bedrooms or living spa	ce				
	Other	(please specify below)					
					_		

QA9.	What was the <u>main reason</u> for moving to this site/encampment/house/yard? (Please tick ✓ one box only)						
	Moved there with parents/family (if known, detail family/parents reasons for moving)						
	Born/raised there (if known, detail family/pa	arents reasons for moving)					
	Own health/family member or other dependent health reasons (please explain below)						
	To be near family/friends						
	To look after a family member / dependent	in old age	_				
	Evicted from last accommodation						
	Lack of sites						
	Overcrowded in previous accommodation						
	For children's schooling/education						
	Homeless						
	Work available in the area		_				
	Land/pitch was available to buy		_				
	There was a vacancy		_				
	Convenient for working pattern (Showpeo)	ole only)	_				
	Holiday		_				
	Family event						
	Other (please specify below)						
	CONTINUE TO SECTION B FOR UNAUTHORISED ENCAMPMENTS						
QA10.	Do other Gypsies/Travellers/Showpeople (t short-term/transit basis? (Please tick ✓ o	riends/family etc.) come to stay with you on a ne box only)					
	Yes	☐ Go to QA11					
	No	☐ Go to QA12					
	Don't know	☐ Go to QA12					

QA11.	how many trailers they bring (i.e. daughte	ay, how often they come, how long they stay and r, her husband and dependent children, twice a trailers.)? (Interviewer: this is to explore how of informally)
QA12.	Is hosting visitors here? (Please tick ✓ o	ne box only)
	Not a problem for you	
	A problem (please specify below)	
	Other (please specify below)	
QA13.		at equipment do you have at present? (Please list quipment as well as issues regarding the

SECTION B: LOCAL AND HISTORIC CONNECTION

This section moves onto asking you about why you are staying in this particular area.

	(Interviewer:	a.	Tick all the reasons tha	at apply	
		b.	From the reasons they that was most important		em to choose one
				a: Yes (Tick ✓ all that apply)	b: Most important reason (Tick ✓ one only)
	Born/raised here)			
	Have family livin	g in area			
	Own/family/depe	endent hea	lth		
	Look after a fam	ily member	r/dependent in old age		
	Children's school	oling/educa			
	Homeless				
	Work available in	n the area			
	Convenient for w	•			
	Availability of site	e(s)/accom	modation		
	Lack of sites				
	Holiday 				
	Family or comm	•			
	Only place I cou		,		
	Other (please sp	Decity below	v) 	_	
QB2.			his general area? (Interv one or Sevenoaks) (Ple		
	Less than 1 montl	h			
	Between 1 and 6	months			
	6 months or more	but less th			
	1 years or more b	ut less thai	n 3		
	3 years or more b	ut less thai	n 5		
	5 years or more b	ut less thai	n 10		
	10 years or more				
	Don't know				

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ADO.	(Please tick ✓ one box only)	pmeni/nouse/yard?
	Up to 1 week	☐ Go to QB4
	2-4 weeks	☐ Go to QB4
	More than 1 month but less than 3 months	☐ Go to QB4
	3 months or more but less than 6 months	☐ Go to QB4
	6 months or more but less than 12 months	☐ Go to QB4
	1 years or more but less than 3 years	☐ Go to QB4
	3 years or more but less than 5 years	☐ Go to QB4
	5 years or more but less than 10 years	☐ Go to QB4
	10 years or more	☐ Go to QB5
	Don't know	☐ Go to QB4

QB4. If resided for less than 10 years at the site/encampment/house/yard please can you tell me where you have lived since late 2001?

Dates (from – to) starting with 2001 onwards	Nearest town	Local authority (if known)	Site type (roadside, UD, LA site, private site)

	(from – to) ag with 2001 ds	Nearest town	Local authority (if known)	Site type (roadside, UD, LA site, private site)
QB5.	ideally we a	eks of the year how many wre looking at the local autl ✓ one box only)		
	Between 1 a	nd 10 weeks	☐ Go to QB6	
	Between 11 a	and 20 weeks	☐ Go to QB6	
	Between 21	and 30 weeks	☐ Go to QB6	
	Between 31	and 40 weeks	☐ Go to QB6	
	Between 41	and 51 weeks	☐ Go to QB6	
	52/Never leav	ve	☐ Go to QB7	
	Don't know		☐ Go to QB6	
QB6.		u usually go for the other pa er) (Interviewer note: expl		
QB7.	Do you have	a base somewhere else? (Please tick ✓ one box on	ly)
	Yes	☐ Go to QB8	3	
	Yes No	☐ Go to QB8		

QB8.	If YES	, where is it and what type of base?	
	a:	Where is it? (i.e. town/local authority)	
	b:	What type of accommodation is it?	
		Unauthorised development (own land no planning)	
		Residential Council/ site/yard	
		Residential Private site/yard with permanent planning permission	
		Residential Private site/yard with temporary planning permission	
		Bricks & Mortar (rented from the local authority or social landlord)	
		Bricks & Mortar (rented from a private landlord)	
		Bricks & Mortar (owner occupier)	
		Other (please specify below)	

SECTION C: TRAVELLING

If it's ok I'd like to talk about your experiences of travelling, or moving about, in general

QC1.	How often do you travel or move at present (Please tick ✓ the statement that most of			
	I/we travel or move every day or so	☐ Go to QC4		
	I we travel or move every week or so	Go to QC4		
	I/we travel or move every month or so	☐ Go to QC4		
	I/ we travel or move a few times a year	☐ Go to QC4		
	I/we travel or move once a year only	☐ Go to QC4		
	I/we never travel	☐ Go to QC2		
QC2.	If NEVER , is this because of any of the foll	owing reasons? (Plea	se tick √ a	ill that apply)
			Yes	No
	Your, a family member or a dependents h	nealth		
	Your, a family member or a dependents of			
	Your, a family member or a dependents older age			
	Other (please specify below)			
QC3.	If NEVER, When did you last travel? (Interago) IF NEVER TRAVEL	viewer: ascertain nui	mber of mo	onths/years
QC4.	Which places do you like to go? - List 3 mindicate the 3 main areas their fairs/ever		elling Shov	wpeople should
	1			
	(nearest town:)		
	2			
	(nearest town:)		
	3.			
	(nearest town:)		

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	(Interviewer: inse		s do you normally travel with? one)				
QC6.	How many pieces (Interviewer: ins		ment do you normally travel with?	?			
QC7.	Have you travelle	d in the la	ast 12 months?				
	Yes		Go to QC8				
	No		Go to SECTION D				
	Don't know		Go to SECTION D				
QC8.	In the last 12 months, did you travel for any of the following reasons?						
	(Interviewer:	a.	Tick all the reasons that app	ly			
		b.	From the reasons they have that was most important)	given, ask t	hem to choose one		
			(Tick	n: Yes √ all that apply)	b: The main reason (Tick ✓ one only)		
	Work opportunit	ies	(Tick	√ all that	reason		
	Work opportunit A holiday	ies	(Tick	√ all that	reason		
	A holiday Attend a fair (no	t working	(Tick	√ all that	reason		
	A holiday Attend a fair (no To visit relatives	t working	(Tick	√ all that	reason		
	A holiday Attend a fair (no To visit relatives To attend family	t working	at fair)	√ all that	reason		
	A holiday Attend a fair (no To visit relatives	t working events unity eve	at fair)	√ all that	reason		

QC9. In the last 12 months have you stayed at any of the following? (Please tick ✓ all that apply)

	Yes	No
Roadside (countryside)		
Roadside (town/city)		
Caravan park (i.e. holiday park/campsite)		
With family/relatives on private sites		
With family/relatives on council/public sites		
Public or private transit sites		
Farmer's fields		
Designated fairground land for Showpeople		
Other Showpeople yards		
Other (please specify below)		

SECTION D: PREVIOUS HOUSING EXPERIENCES

Is it ok now to move onto talking about some of the places you have lived in the past?

QD1.	What type of accommodation did you live in/on immediately before (Please tick ✓ one box only)	e you came here?
	Unauthorised encampment	☐ Go to QD2
	Unauthorised development (own land no planning)	☐ Go to QD2
	Residential Council/ site/yard	☐ Go to QD2
	Residential Private site/yard with permanent planning permission	☐ Go to QD2
	Residential Private site/yard with temporary planning permission	☐ Go to QD2
	Transit site	☐ Go to QD2
	Bricks & Mortar (rented from the local authority or social landlord)	☐ Go to QD2
	Bricks & Mortar (rented from a private landlord)	☐ Go to QD2
	Bricks & Mortar (owner occupier)	☐ Go to QD2
	Been here all my adult life	☐ Go to SECTION E
	Other (please specify below)	☐ Go to QD2
QD2.	Where was this? (i.e. which town/local authority)	

QD3.	What was the main re	<u>eason</u> f	or leaving there? (Please tick ✓ or	ne box only)
	To be near family/frie	ends		
	Own health/family me	ember c	or other dependent health reasons	
	Evicted			
	For children's school	ing/edu	cation	
	Harassment			
	Land/pitch was availa	able to I	ouy here	
	There was a vacancy	/ here		
	Overcrowded condition	ons		
	Fears over personal	safety		
	Site closure			
	Planning problems			
	Wanted independent	е		
	Work reasons			
	To travel			
	Site/accommodation	conditio	ons	
	Get married/live with	partner		
	No particular reason			
	Other (please specify	below)		
QD4.			ise (Interviewer – if currently in a (Please tick ✓ one box only)	house this question asks
	Yes		Go to QD5	
	No		Go to SECTION E	
	Don't know		Go to SECTION E	
QD5.	What type of house?	(Pleas	se tick ✓ one box only)	
	Council rented Housing Association/ Private rented Privately owned Other (please specify			

QD6.	Where was it	? (i.e. which t	own/local authority)		
QD7.	What was the	main reasor	n for moving to that he	ouse? (Pleas e	e tick ✓ one box or	nly)
	Moved there	with parents/fa	amily (if known, detail	family/parents	s reasons for moving	g) 🗆
	Born/raised th	nere (if known	, detail family/parents	reasons for m	noving)	
	Own health/fa	amily member	or other dependent h	nealth reasons	(please explain belo	ow)
	To be near fa	mily/friends				
	To look after	a family memb	oer / dependent in old	l age		
	Evicted from	last site				
	Lack of sites					
	For children's	schooling/ed	ucation			
	Homeless					
	Work availabl	e in the area				
	House was a	vailable to buy	1			
	House was a	vailable to ren	t			
	Convenient fo	or working pat	tern (Showpeople)			
	Other (please	specify belov	v)			
0.00						
QD8.	How would yo	ou rate your ex	xperience of living in	a nouse? (Ple	ease tick √ one box	c only)
	Very good	Good	Neither good nor poor	Poor	Very poor	Don't know

QD9.	What was the <u>main reason</u> for leaving the house? (Please tick ✓	one box only)
	To be near family/friends	
	Own health/family member or other dependent health reasons	
	Evicted	
	For children's schooling/education	
	Harassment	
	Land/pitch was available to buy here	
	There was a vacancy here	
	Overcrowded conditions	
	Fears over personal safety	
	Wanted independence	
	Work reasons	
	To travel	
	Site/accommodation conditions	
	Get married/live with partner	
	No particular reason	
	Other (please specify below)	

SECTION E: HOUSEHOLD DETAILS

QE1. Thinking about the people you live with, can you tell me their ages, whether they are male or female, their marital status and their relationship to you.

Interviewer: Please note that the person you interview is always number 1. In order to avoid confusion you should work downwards getting all information for one household member, then moving on to next household member.

	FAMILY MEMBER										
AGE	1	2	3	4	5	6	7	8	9	10	11
0 – 5 years											
6 – 10 years											
11 – 16 years											
17 – 24 years											
25 – 39 years											
40 – 49 years											
50 - 59 years											
60 – 74 years											
75 – 84 years											
85 years +											
GENDER		_	_		_	_	_	_		_	
Male											
Female											
MARITAL STATUS		_	_	_	_	_	_	_	_	_	
Married											
Single											
Living together											
Widowed											
Separated											
Divorced											
RELATIONSHIP		1	ı	1	T	ı	T	T	ı	ı	
Partner											
Son or daughter											
Sister/brother											
Uncle/aunt											
Cousin											
Grandparent											
Grandchild											
Other											

OFFICE	: USE ONLY	
QE2.	How many people are there in the household?	
QE3.	How many adults are there in the household age	d 60 or over?
QE4.	How many children are there in your household a	ged:
	None	
	0 – 5	_
	6 – 10 11 – 16	_
		_
QE5.	How do you think of yourself? (Plea	se tick ✓ one box only)
	Romany/Gypsy (English)	
	Welsh Gypsy/Traveller	
	Scottish Gypsy/ Traveller	
	Irish Traveller	П
	New Traveller	
	Traveller (not specified)	
	Showmen/Circus person	
	Roma	
	Bargee/Boat dweller	
	Other (please specify below)	
	Don't know	<u></u> -
	Refused	
	Do you mind telling me a bi	t about the work you and your family do?
QE6.	Are you and your family employed/s	elf employed?
	(Please write the number of peopl	e as well if appropriate)
	Self employed	
	Employed	
	Both employed and self-employed	
	Retired	
		
QE7.	Do you mind telling me what type of	work you and your family do? (i.e. main trade)
		· · · · · · · · · · · · · · · · · · ·

QE8.	Where do you (m	ostly) work	(Please tick ✓</th <th>one box or</th> <th>ıly)</th> <th></th>	one box or	ıly)	
	Within the same	e local area	a			
	Within Maidstor (note: show m		aks i <mark>ct and include</mark> p	olace below)		
	Within South Ea	ast				
	Other parts of the	ne UK				
	Abroad					
	Other (please s	pecify belo	w)			
					_	
	Interviewer pro	mpt for a	specific location	ı (i.e. neares	st town)	
QE9.	Do you have any	site/space	needs relating to	your work?	(Please tick ✓ one	box only)
	Yes		Go to QE10			
	No		Go to SECTIO	NF		
	Don't know		Go to SECTIO	NF		
QE10.	If YES , what nee	ds?				

SECTION F: HEALTH SERVICES

I'd like to talk to you a little bit about what you think of the local health services.

QF1. Do you or your family feel that you have sufficient access to the following services?

Comico	Have a	ccess	Not relevant
Service	Yes	No	
GP/health centre			
Health visitor			
Maternity care			
A&E			
Dentist			

	Dontiot							
F2.	Is there anyth	ing that stopa ✓ one box o	s you from nly)	accessing a	any of the a	bove?		
	Yes		Go to G	PF3				
	No		Go to C	QF4				
	Don't know		Go to G	F4				
F3.	If YES , what?	(Interviewe	er: probe fo	or issues s	uch as trar	nsport, lac	k of aware	ness, et
- 4.	Are there any improved?	ways in whice	ch you thinl	k health ser	vices, or yo	ur access t	o them, co	uld be

SECTION G: FUTURE ACCOMMODATION

Finally I'd like to ask some questions about the future.

QG1.	Thinking about your current accommodation which of th (Please tick ✓ one box only)	e following applies to you?
	I would like to move immediately	☐ Go to QG2
	I would like to move in the next 12 months	☐ Go to QG2
	I would like to move in the next 1 – 2 years	☐ Go to QG2
	I would like to move in the next 2 – 5 years	☐ Go to QG2
	I would like to move in the next 5 – 10 years	☐ Go to QG2
	I am going to stay in this accommodation indefinitely	☐ Go to QG8
	Other (please describe below)	☐ Go to QG2

a.

QG2. Why do you need to move?

(Interviewer:

b. From the reasons they have that was most important)	given, ask them	to choose one
	a: Yes (Tick ✓ all that apply)	b: The most important reason (Tick ✓ one only)
Own health/family member or other dependent health reasons		,
For children's schooling/education		
To look after a family member / dependent in old age		
To be nearer to family/friends		
Overcrowded living conditions		
Overcrowded on site		
To move to a vacant pitch on a preferred site		
Going to buy own site/pitch		
Being moved on (as encamped)		
Eviction		
Harassment		
Fears over personal safety		
Site closure		
No planning permission		
Want independence		
Work reasons		
To travel		
Site/accommodation conditions		
Get married/live with partner		
No particular reason		
Other (please specify below)		
QG3. Do you intend to stay in this area? (Interviewer: the local a (Please tick ✓ one box only)	uthority area)	
Yes		
No		
Don't know		

Tick all the reasons that apply

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	b.	Tick all types that appl From types they have preference)	choose their		
			a: Yes (Tick √ all that apply)	b: Main preference (Tick ✓ one only)	
Roadside/inform	nal stoppi	ng place			
Own site with p	lanning pe	ermission			
Council owned	site – per	manent			
Council owned	site – trar	nsit			
Private site owr	ned by sor	meone else			
Piece of land to	buy (with	out planning permission)			
I already own a	piece of I	and			
Bricks and mort	tar/anothe	r house			
Other (please s	pecify bel	ow)			
Within Maidstone	e/Sevenoa	ve to? (Please tick ✓ one aks ict and include place belo			
Within South Eas	st				
Other parts of the	e UK				
Abroad					
			_		

QG4. What type of accommodation are you looking for?

QG6.	Why this place?				
	(Interviewer:	a.	Tick all the reasons that	t apply	
		b.	From the reasons they have given, ask them to choose one that was most important)		
				a: Yes (Tick ✓ all that apply)	b: The most important reason (Tick ✓ one only)
	Born/raised there				
	Have family living	in area			
	Own/family/depen	Own/family/dependent health			
	Look after a family	/ memb	er/dependent in old age		
	Children's schooli	ng/educ	ation		
	Homeless				
	Work available in	the area			
	Convenient for wo	rking pa			
	Availability of site(s)/acco	mmodation		
	Lack of sites				
	Holiday				
	Family or community event				
	Only place I could find				
	Other (please specify below)				
QG7.	Is there any accomi	modatio	on available for you to move	to? (Please tick	√ one box only)
	Yes				
	No				
	Don't know				
QG8.		grown เ	usehold who is in need of th up children, extended family nly)		accommodation
	Yes	□G	o to QG9		
	No	□G	o to QG15		
	Don't know	□ G	o to QG15		
QG9.	How many member	s of you	ur household?		

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QG10.	Who (note: include ages at the tim	ne of the interview)?				
QG11.	Where do you expect them to move to? (Please tick ✓ one box only)					
	Within the same local area					
	Within Maidstone/Sevenoaks (note: show map of district and include place below)					
	Within South East					
	Other parts of the UK					
	Abroad					
	Don't know					
	Interviewer prompt for a specific location (i.e. name of nearest town):					
QG12.	What sort of accommodation are they likely to need? (Please tick ✓ one box only)					
	Bricks & Mortar	☐ Go to QG15				
	Site based trailer/caravan	☐ Go to QG13				
	Up to them	☐ Go to QG13				
	Don't know	☐ Go to QG13				
	Other (please specify below)	☐ Go to QG13				
QG13.	How would they prefer to be accomm	modated? (Please tick ✓ one box only)				
QO 10.	Then we did they profes to be december	induction (induction with box only)				
	Live on this pitch with us	☐ Go to QG14				
	Live on this site	☐ Go to QG15				
	Move to another site	☐ Go to QG15				
	Don't know	☐ Go to QG15				
	Other (please specify below)	☐ Go to QG15				

QG14.	Is there enough room on your pitch to accommodate then	n? (Please tick ✓ one box only			
	Yes, but likely to need planning permission				
	Yes, without needing planning permission				
	Yes, but uncertain of the need for planning permission				
	Yes, but would need permission from the landlord				
	No				
	Don't know				
	Other (please specify below)				
QG15.	Is there anyone in your household (e.g. son or daughter) separate accommodation in the next 5 years (by 2016)?				
	Yes Go to QG16				
	No Go to QG22				
	Don't know Go to QG22				
QG16.	How many members of your household?	_			
QG17.	Who (note: include ages at the time of the interview)?				
QG18.	Where do you expect them to move to? (Please tick ✓ one box only)				
	Within the same local area				
	Within Maidstone/Sevenoaks (note: show map of district and include place below)				
	Within South East				
	Other parts of the UK				
	Abroad				
	Don't know				
	Interviewer prompt for a specific location (i.e. nearest	town):			

QG19.	What sort of accomm	nodation are they likely	to need? (P	ease tick ✓ one box only)
	Bricks & Mortar		☐ Go to Q	G22
	Site based trailer/car	ravan	☐ Go to Q	G20
	Up to them		☐ Go to Q	G20
	Don't know		☐ Go to Q	G20
	Other (please specif	y below)	☐ Go to Q	320
QG20.	How would they pref	er to be accommodate	d? (Please t i	ck ✓ one box only)
	Live on this pitch with	h us	☐ Go to Q	G21
	Live on this site		☐ Go to Q	G22
	Move to another site		☐ Go to Q	G22
	Don't know		☐ Go to Q	G22
	Other (please specify	y below)	☐ Go to Q	G22
QG21.	Yes, but likely to need planning permission Yes, without planning permission Yes, uncertain of the need for planning permission Yes, but would need permission from the landlord No Don't know Other (please specify below) Please tick ✓ one box only			
QG22.	(Please tick ✓ one k Yes No	oox only) ☐ Go to QG23 ☐ Go to QG24	- currently on	a waiting list(s) for a site?
	Don't know	☐ Go to QG24		

QG23.	Which site(s)? Wher	e? Is it local authority site/private	e sites/etc.?		
QG24.	Are you – or a memb (Please tick ✓ one b	per of your household – currently box only)	on a waiting list for a house?		
	Yes	☐ Go to QG25			
	No	☐ Go to QG26			
	Don't know	☐ Go to QG26			
QG25.	Which list? Where?				
QG26.	Could you currently afford to purchase any of the following? (Please tick ✓ all that apply)				
	A pitch on a private site with planning permission				
	A pitch on a private site without planning permission				
	Land to be developed into a site				
	Cannot afford to purchase land or a pitch				
	Not relevant (please	specify below)			

We are now going to ask a couple of questions about income and savings. Please remember that any information you give is completely confidential – the following questions ask about income and savings but are important in terms of being able to plan affordable accommodation

QG27. What does your rent / mortgage cost in total per week or month for your current accommodation approximately? (Please tick ✓ one box only)

Interviewer: please note that you need the TOTAL cost of rent / mortgage for the whole dwelling/pitch

Weekly	Monthly	
Under £30	Under £130	
£30 - £59	£130 - £255	
£60 - £89	£256 - £385	
£90 - £119	£386 - £515	
£120 - £149	£516 - £645	
£150 - £179	£646 - £775	
£180 - £209	£776 - £905	
£210 - £239	£906 - £1,035	
£240 - £269	£1,036 - £1,165	
£270 - £299	£1,166 - £1,295	
£300 or more	£1,296 or more	
Don't know		
Prefer not to say		
Don't pay rent or mo	rtgage	

QG28. Please can you tell me your household's weekly, monthly or annual gross income (i.e. before tax but including any investment income or household state benefits)?

(Please tick ✓ one box only)

Weekly	Monthly	Annual	
Under £50	Under £217	Under £2,600	
£50 - £100	£217 - £433	£2,600 - £5,200	
£101 - £150	£434 - £650	£5,201 - £7,800	
£151 - £200	£651 - £867	£7,801 - £10,400	
£201 - £250	£868 - £1,080	£10,401 - £13,000	
£251 - £300	£1,081 - £1,300	£13,001 - £15,600	
£301 - £350	£1,301 - £1,517	£15,601 - £18,200	
£351 - £400	£1,518 - £1,733	£18,201 - £20,800	
£401 - £500	£1,734 - £2,167	£20,801 - £26,000	
£501 - £700	£2,168 - £3,033	£26,001 - £36,400	
£701 - £900	£3,034 - £3,900	£36,401 - £46,800	
£901 - £1,100	£3,901 - £4,767	£46,801 - £57,200	
£1,101 - £1,300	£4,768 - £5,633	£57,201 - £67,600	
£1,301 - £1,500	£5,634 - £6,500	£67,601 - £78,000	
£1,501 - £1,700	£6,501 - £7,366	£78,001 - £88,400	
£1,701 - £2,000	£7,367 - £8,666	£88,401 - £104,000	
Over £2,000	Over £8,667	Over £104,000	
None			
Don't know			
Prefer not to say			

QG29.	29. Please can you indicate your total household savings? (Please tick ✓ one box only)			
	(Interviewer: please note that this varied for.)	vould not include children or those who are		
	In debt (negative savings)			
	None			
	£1,000 or less			
	£1,001 - £5,000			
	£5,001 - £10,000			
	£10,001 - £25,000			
	£25,001 - £50,000			
	£50,001 - £100,000			
	£100,001 - £250,000			
	Over £250,000			
	Prefer not to say			
	like to mention?			

Thank you very much for your time For further details on the study please contact: Dr Phil Brown on 0161 295 3647 or Dr Lisa Scullion on 0161 295 5078

Appendix 5: Gypsy and Traveller Accommodation and Pitch Need

Table A5: Detailed Gypsy and Traveller Accommodation and Pitch Need

		Column 1	Column 2
	Element of supply and need	Accommodation Need/Supply Total (households)	Pitch Need/Supply Total (pitches): Application of Planning Definition
	Current residential supply		
1	Socially rented pitches	58.00	58.00
2	Private authorised pitches	30.00	30.00
3	Total authorised Gypsy and Traveller pitches	88.00	88.00
	Residential pitch need, 2012–2016		
4	End of temporary planning permissions	14.00	10.92
5	Concealed households	5.00	5.00
6	New household formation	5.86	5.86
	Private permanent sites	1.80	1.80
	Private temporary sites	0	0
	Socially rented sites	4.06	4.06
	Unauthorised developments	0	0
7	Unauthorised developments	21.00	19.53
8	Net Movement from housing to sites	-0.46	-0.46
	Housing to sites	2.00	2.00
	Sites to housing	2.46	-2.46
9	Closure of sites	0	0
10	Unauthorised encampments	0	0
11	Movement between areas	0	0
12	Residential pitch need (2012–2016)	45.40	40.85
13	Supply (2012-2016)	1.00	1.00
14	Residential pitch need (2012-2016)	44.40	39.85
15	Residential pitch need (2017–2021)	15.82	15.27
16	Residential pitch need (2022–2026)	17.71	17.10
17	Total Residential pitch need (2012–2026)	77.92	72.22



Planning policy for traveller sites





Planning policy for traveller sites

March 2012 Department for Communities and Local Government

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Planning policy for traveller sites

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Introduction

- 1. This document sets out the Government's planning policy for traveller¹ sites.² It should be read in conjunction with the National Planning Policy Framework
- 2. Planning law requires that applications for planning permission must be determined in accordance with the development plan³, unless material considerations indicate otherwise⁴. This policy must be taken into account in the preparation of development plans, and is a material consideration in planning decisions. 5 Local planning authorities preparing plans for and taking decisions on traveller sites should also have regard to the policies in the National Planning Policy Framework so far as relevant.
- 3. The Government's overarching aim 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.
- 4. To help achieve this, Government's aims in respect of traveller sites are:
 - that local planning authorities should make their own assessment of need for the purposes of planning
 - to ensure that local planning authorities, working collaboratively. develop fair and effective strategies to meet need through the identification of land for sites
 - to encourage local planning authorities to plan for sites over a reasonable timescale
 - that plan-making and decision-taking should protect Green Belt from inappropriate development
 - to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites
 - that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective

¹ See Annex 1 for the definition of traveller for the purposes of this statement.

² This policy replaces ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople.

³ Section 38(1) of the Planning and Compulsory Purchase Act 2004

⁴ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

⁵ Sections 19(2)(a) and 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990. In relation to neighbourhood plans, under section 38B and C and paragraph 8(2) of new Schedule 4B to the 2004 Act (inserted by the Localism Act 2011 section 116 and Schedules 9 and 10) the independent examiner will consider whether having regard to national policy it is appropriate to make the plan.

- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies
- to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- to reduce tensions between settled and traveller communities in planmaking and planning decisions
- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- for local planning authorities to have due regard to the protection of local amenity and local environment.
- 5. To benefit those engaged in planning for traveller sites, specific planning policies for traveller sites are clearly set out in this separate document. The Government intends to review this policy when fair and representative practical results of its implementation are clear. It is intended to incorporate a version of this policy within the National Planning Policy Framework at that stage, having taken account of the results of its implementation.

Using evidence

Policy A: Using evidence to plan positively and manage development

- 6. In assembling the evidence base necessary to support their planning approach, local planning authorities should:
 - a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)
 - b) co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities
 - c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.

Plan-making

Policy B: Planning for traveller sites

- 7. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the policies in the National Planning Policy Framework, including the presumption in favour of sustainable development and the application of specific policies in the Framework and this planning policy for traveller sites.
- 8. Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople⁶ which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 9. Local planning authorities should, in producing their Local Plan:
 - a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
 - b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
 - c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
 - d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
 - e) protect local amenity and environment
- 10. Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies

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⁶ See Annex A for definitions of 'pitch' and 'plot'.

⁷ To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that development will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

⁸ To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

- 11. Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:
 - a) promote peaceful and integrated co-existence between the site and the local community
 - b) promote, in collaboration with commissioners of health services, access to appropriate health services
 - c) ensure that children can attend school on a regular basis
 - d) provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
 - e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development
 - f) avoid placing undue pressure on local infrastructure and services
 - g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
 - h) reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Policy C: Sites in rural areas and the countryside

12. When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.

Policy D: Rural exception sites

13. If there is a lack of affordable land to meet local traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites, including using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities⁹, that would not normally be used for traveller sites.

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⁹ Small rural settlements have been designated for enfranchisement and right to acquire purposes (under Section 17 of the *Housing Act 1996*) by SI 1997/620-25 inclusive and 1999/1307.

Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.

Policy E: Traveller sites in Green Belt

- 14. Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.
- 15. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

Policy F: Mixed planning use traveller sites

- 16. Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practicable.
- 17. Local planning authorities should have regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment.
- 18. Local planning authorities should not permit mixed use on rural exception sites.

Policy G: Major development projects

19. Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site. Local planning authorities are entitled to expect the applicant to identify and provide an alternative site, providing the development on the original site is authorised.

Decision-taking

Policy H: Determining planning applications for traveller sites

- 20. Planning law requires that applications for planning permission must be determined in accordance with the development plan¹⁰, unless material considerations indicate otherwise¹¹.
- 21. Applications should be assessed and determined in accordance with the presumption in favour of sustainable development and the application of specific policies in the National Planning Policy Framework and this planning policy for traveller sites.
- 22. Local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:
 - a) the existing level of local provision and need for sites
 - b) the availability (or lack) of alternative accommodation for the applicants
 - c) other personal circumstances of the applicant
 - d) that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites
 - e) that they should determine applications for sites from any travellers and not just those with local connections
- 23. Local planning authorities should strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate the nearest settled community, and avoid placing an undue pressure on the local infrastructure.
- 24. When considering applications, local planning authorities should attach weight to the following matters:
 - a) effective use of previously developed (brownfield), untidy or derelict land

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¹⁰ Section 38(1) of the Planning and Compulsory Purchase Act 2004: this includes adopted or approved development plan documents i.e. the local plan and neighbourhood plans which have been made in relation to the area (and the London Plan)

¹¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

- b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness
- c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children
- d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community
- 25. Subject to the implementation arrangements at paragraph 28, if a local planning authority cannot demonstrate an up–to-date five-year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission¹².
- 26. Local planning authorities should consider how they could overcome planning objections to particular proposals using planning conditions or planning obligations including:
 - a) limiting which parts of a site may be used for any business operations, in order to minimise the visual impact and limit the effect of noise
 - b) specifying the number of days the site can be occupied by more than the allowed number of caravans (which permits visitors and allows attendance at family or community events)
 - c) limiting the maximum number of days for which caravans might be permitted to stay on a transit site.

Policy I: Implementation

- 27. This planning policy comes into effect on the same day as the National Planning Policy Framework.
- 28. The policy set out in paragraph 25 only applies to applications for temporary planning permission for traveller sites made 12 months after this policy comes into force.
- 29. The implementation policies set out in the National Planning Policy Framework will apply also to plan-making and decision-taking for traveller sites. In applying those implementation provisions to traveller sites, references in those provisions to policies in the National Planning Policy Framework should, where relevant, be read to include policies in this planning policy for traveller sites.

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¹² Policy on the use of temporary permissions is set out in *Circular 11/1995: The Use of Conditions in Planning Permission*. This states that there is no presumption that a temporary planning permission should become permanent.

Annex 1: Glossary

1. For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' 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.

2. For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised 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.

- 3. For the purposes of this planning policy, "travellers" means "gypsies and travellers" and "travelling showpeople" as defined above.
- 4. For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use plots for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment.