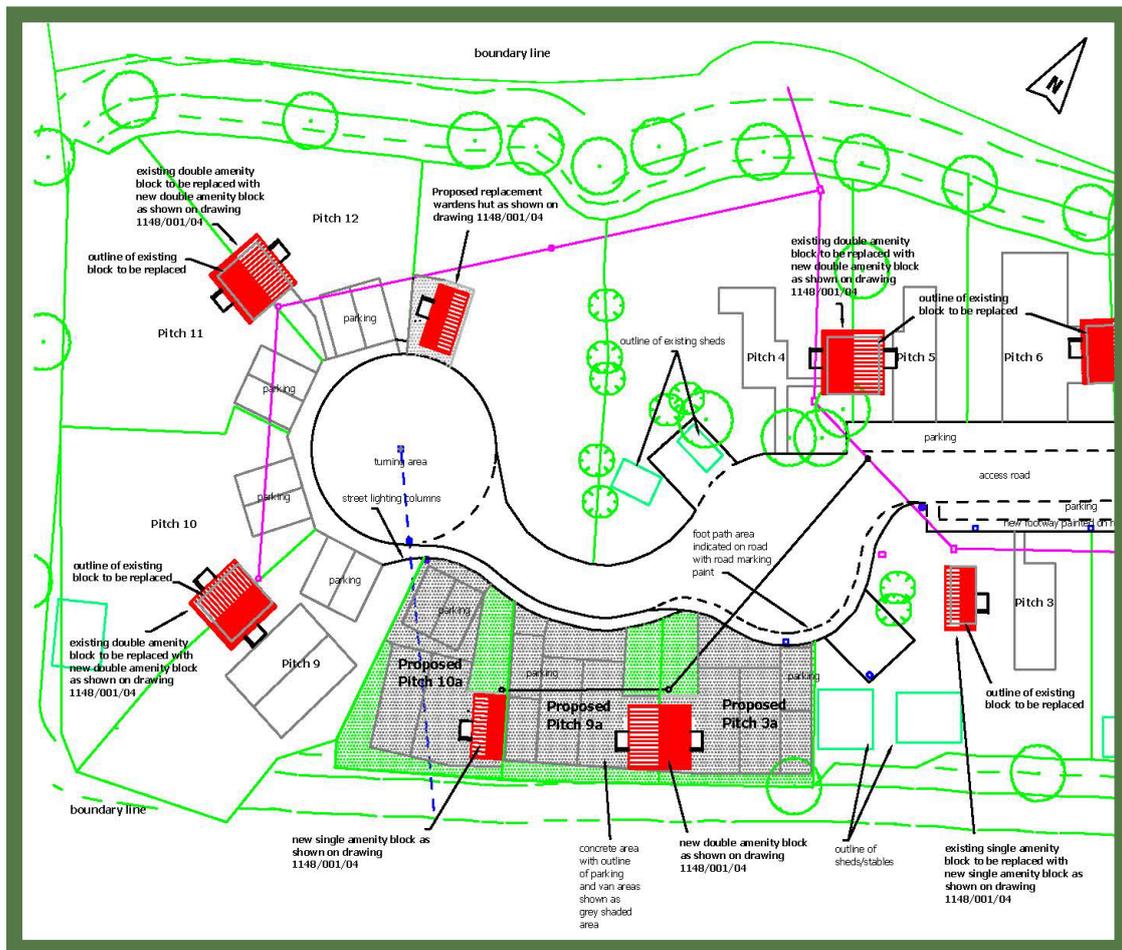


Gypsy and Traveller Plan

Site Options Consultation Document



May 2014

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1. Introduction

1.1. The Government believes that everyone should have the opportunity of a decent home. Ensuring the availability of decent homes is considered a key element of any thriving, sustainable community, and is true for both the settled and Gypsy and Traveller communities alike.

1.2. Through its national planning policy, the Government is committed to ensuring fair and equal treatment for gypsies and travellers. In order to achieve this Local Planning Authorities should make their own assessment of need across their District or Borough, and seek to plan positively in line with the principles of sustainable development.

1.3. This Gypsy and Traveller Plan - Site Options Consultation document is the first stage in the consultation process for the preparation of the Gypsy and Traveller Plan. The consultation presents an initial assessment of the site options proposed to the Council and identified by it. Inclusion in this document does not necessarily mean that a site will be taken forward as the plan progresses to examination and adoption. The Council will positively consider any proposed alternatives to the sites in this consultation document. The Gypsy and Traveller Plan, once adopted, will form part of the LDF/Local Plan, and will allocate a number of suitable and deliverable sites that provide for the identified accommodation needs of Gypsies and Travellers across Sevenoaks District. It is critical, therefore, that the suitability and deliverability of sites is robustly assessed and that sound planning reasons can be presented by the Council when proposing or rejecting sites. Before the Council can adopt a Gypsy and Traveller Plan it must be subjected to independent examination and found sound by a Government-appointed Planning Inspector.

1.4. The Council undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) in March 2012. The GTAA is the key evidence base document for identifying the need across Sevenoaks District. The study identified a need for 40 pitches to be delivered over the period 2012-2016 (when applying the planning definition tests of Gypsies and Travellers) and a subsequent need for a further 32 pitches over the period 2017 to 2026 (a total of 72 over the period 2012-2026).

1.5. It is important to plan to meet this need, as without the identification of suitable sites, the Council will find it hard to resist new proposals for sites across the District, regardless of their location, as strategic provision will not have been identified. Initial assessments have been conducted on the constraints of each site option, according to the criteria adopted in Core Strategy Policy SP6 for their potential suitability to provide Gypsy and Traveller accommodation. These criteria are outlined in para 6.5 of this document and the views of all stakeholders are now being sought on these sites, as well as an opportunity to put forward other sites that may be considered more suitable.

1.6. The responses made during the consultation, along with any additional sites suggested, will be duly considered and will assist in informing the next stages of the Gypsy and Traveller Plan preparation, which will put forward the Council's preferred options.

2. How to Respond to this Consultation

2.1. The Gypsy and Traveller Plan is being prepared as part of the Local Plan for Sevenoaks District to allocate sites for future gypsy and traveller accommodation.

2.2. This Site Options Consultation document represents the first stage in the preparation process of the Gypsy and Traveller Plan. We wish to hear from you regarding the set of site options put forward in this document to meet the identified need for providing Gypsy and Traveller accommodation across the District.

2.3. The consultation period runs from 9am on 23rd May to 5pm on 4th July 2014 but the Council will accept submission of alternative sites until 5pm on 18th July 2014.

How to comment:

You can make representations using several methods:

- By completing the form online at www.planningconsult.sevenoaks.gov.uk/GTPlanSitesOptions
- Email your response to ldf.consultation@sevenoaks.gov.uk
- By completing and returning the response form available through the online portal.

3. Background

3.1. The Council is required by the Housing Act 2004 and the National Planning Policy for Travellers to meet the accommodation needs of the population within the District, including the needs of the Gypsy and Traveller community and Travelling Showpeople unless it is able to agree that other authorities will meet this need through the Duty to Co-operate.

3.2. This Gypsy and Traveller Plan will eventually form part of the Local Plan for Sevenoaks District, and will set out a number of sound sites allocated to meet the accommodation needs of Gypsy, Traveller, and Travelling Showpeople for the current plan period (up to 2026). This Sites Options Consultation Document represents the first stage of consultation, setting out potential site options to address the identified need within the District.

Defining Gypsy and Travellers, and Sites and Pitches

3.3. For the purposes of this document, the definition of Gypsies and Travellers is taken from the national Planning Policy for Traveller Sites (2012):

Gypsies and Travellers -

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

Travelling Showpeople -

"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 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."

3.4. The terms 'site' and 'pitch' are often used to describe Gypsy and Traveller accommodation, and are commonly confused. It is important therefore to note what is meant by each term to ensure they are not mis-used.

What do we mean by 'Site' and 'Pitch'?

A Gypsy and Traveller **site** is an area of land on which Gypsies and Travellers are accommodated. Sites contain one or several units of accommodation. These units are known as a **pitch**. A pitch is generally home to one household. For example, a public site will almost certainly be home to several families, each who occupy their own pitch within that site.

There is no set definition of what should be contained within a pitch, but it is generally accepted that an average family pitch must be capable of accommodating a large trailer and touring caravan, an amenity building, parking space for two vehicles, and a small garden area (DCLG Designing Gypsy and Traveller Sites - Good Practice Guide para.7.12). Taking into account the available guidance, it is generally accepted that an average pitch size is 500sqm.

Main Aim, Objectives and Challenges

3.5. The National Planning Policy for Traveller Sites (PPTS) sets out the requirement for Local Planning Authorities to make their own assessment of need for Gypsy, Traveller, and Travelling Showpeople accommodation, ensuring fair and equal strategies to meet the identified need are developed. Further information on national planning policy in respect of Gypsies and Travellers is set out in section 4 of this consultation document. The main strategic document for Sevenoaks District is the Core Strategy (2011), which sets out the long-term spatial vision for how the District will develop and change up to 2026. The national and local planning policy context is set out in section 4.

3.6. The shortage of authorised Gypsy and Traveller sites across Sevenoaks District provides the key challenge this Plan seeks to address. The Plan will sit alongside the Core Strategy and Allocations and Development Management Plan (ADMP) as development plan documents, and once adopted will allocate sites for Gypsy and Traveller accommodation that have been robustly assessed and are demonstrated to be suitable and deliverable within the plan period.

3.7. The Gypsy, Traveller, and Travelling Showpeople Accommodation Assessment (2012) sets out the need for Sevenoaks District, identifying a requirement for 72 pitches to be delivered between 2012 and the end of the current plan period (2026).

3.8. However, Sevenoaks District is covered to a large extent by planning and landscape constraints, with 93% Metropolitan Green Belt and 61% Area of Outstanding Natural Beauty afforded considerable protection in national policy. These represent challenges to identifying suitable locations to meet the requirement.

3.9. The overarching aim of the Plan is therefore:

To increase the number of authorised Gypsy and Traveller pitches in the most appropriate locations across Sevenoaks District, reducing the number of unauthorised sites, and to enable Gypsy and Travellers to access services and facilities to meet their needs, whilst respecting the needs of the settled community in these locations.

3. Background

In order to achieve this aim, the Plan seeks to address a number of sub-objectives being:

- To identify sites that are available, suitable and deliverable to meet the identified need in Sevenoaks District;
- To allocate sites and grant permission for such sites that are sustainably located so as to improve access to local services and facilities such as education, healthcare provision, and convenience goods, whilst having minimal impact upon the surrounding landscape;
- To provide clear development management guidance for the assessment of planning applications regarding Gypsy and Traveller sites; and
- To ensure sites are designed to a high quality, providing a safe and pleasant living environment for residents.
- To protect the Green belt from inappropriate development, whilst recognising the difficulties of securing Gypsy and Traveller accommodation in the urban areas across the District.

Consultation Questions - Main Aim and Objectives

Q1 Do you agree with the main aim and objectives of the Plan?

Q2 Do you think there are any other objectives that the Plan should address?

4. Planning Policy Framework

National Planning Policy and Guidance

4.1. In March 2012, the Government published a new Planning Policy for Traveller Sites (PPTS), in conjunction with the National Planning Policy Framework (NPPF). The overarching aim of government policy for Gypsies and Travellers is to ensure their fair and equal treatment in a way that facilitates the traditional and nomadic way of life, while respecting the interests of the settled community (para.3).

4.2. The policy sets out the requirement for local planning authorities (LPAs) to make their own assessment of need, setting their own pitch targets for gypsies and travellers and plot targets for travelling showpeople. This must be based on robust evidence, including engagement and cooperation with the traveller and settled community, and involve collaborative working with neighbouring authorities (para.4).

4.3. Policy B of the PPTS states that Local Plans addressing gypsy and traveller needs should:

- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of sites against their locally set targets;
- Identify a supply of specific, developable sites or broad locations for growth for years 6-10, and where possible years 11-15;
- Ensure sites are sustainable economically, socially and environmentally
- Set criteria to guide land supply allocations and help determine planning applications;
- Consider the provision of suitable traveller sites for mixed residential and business uses wherever possible; and
- Protect the Green Belt from inappropriate development, strictly limiting new traveller sites in open countryside away from existing settlements or outside areas allocated in the development plan.

4.4. Regard must also be given to the NPPF, which sets out the Government's overarching planning policies for England with a presumption in favour of sustainable development.

4.5. There are no set requirements of what should be contained within a site or a pitch. In order to assist Local Authorities and those involved in the design and delivery of sites, the Government produced a Good Practice Guide (2008). The guide is intended to concentrate on issues such as how to design successful sites by identifying good practice case studies and examples, and the consideration of the need to achieve a good mix of accommodation.

4.6. Chapter 4 of the Good Practice Guide recommends that, whilst there is no one ideal size of site or number of pitches, experience of site managers and residents alike suggests that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage (para.4.7). It goes on to suggest that smaller sites containing fewer pitches can also be successful, particularly if accommodating one extended family. The guidance recognises that if evidence exists to demonstrate that sites larger than the suggested threshold of 15 pitches is preferable by the local Gypsy or Traveller community, then higher capacities can be acceptable (para.4.8).

Local Planning Policy

4.7. Policy SP6 of the Core Strategy (2011) sets out the criteria by which sites will be assessed for allocation for gypsy and traveller accommodation, and if required, for travelling showpeople alongside national planning policy.

4.8. The identification of sites will take account of the following criteria:

- *The site should be located within or close to existing settlements with a range of services and facilities and access to public transport*
- *The site is of a scale appropriate to accommodate the facilities required and will offer an acceptable living environment for future occupants in terms of noise and air quality*
- *Safe and convenient vehicular and pedestrian access can be provided to the site*
- *The site is not located within an area liable to flood*
- *The development will have no significant adverse landscape or biodiversity impact. Particular care will be taken of landscape impacts on AONBs. In the AONBs, sites should only be allocated where it can be demonstrated that the objectives of the designation will not be compromised.*
- *Alternatives should be explored before Green Belt locations are considered.*

4.9. The policy further states that land allocated for Gypsies and Travellers and Travelling Showpeople will be safeguarded for this purpose so long as a need exists in the District for accommodation for Gypsies and Travellers and Travelling Showpeople.

4.10. Proposals for sites for Gypsies and Travellers and Travelling Showpeople on other land outside existing settlement confines will only be permitted where it is first demonstrated that the development is for occupation by Gypsies and Travellers or Travelling Showpeople and that the proposed occupant has a need for accommodation that cannot be met on lawful existing or allocated sites in the region. In addition development proposals will need to comply with the criteria above.

4.11. For the purposes of this policy Gypsies and Travellers are people who meet the definition in Circular 01/06, as set out in the Core Strategy. This definition has now been carried forward into the Government's Planning Policy for Traveller Sites, set out in para 3.3 of this document.

5. Preparing the Gypsy and Traveller Site Options Consultation Document

Development of the Document

5.1. This Plan has been prepared in accordance with:

National and local policies:

- The National Planning Policy Framework 2012
- Planning Policy for Traveller Sites 2012
- Sevenoaks District Core Strategy 2011
- The Community Plan for Sevenoaks 2013
- Statement of Community Involvement 2006

Evidence base:

- Gypsy, Traveller and Travelling Showpeople Accommodation Assessment for Sevenoaks (2012)

Key Assessments and Appraisals:

- Sustainability Appraisal of the potential site allocations highlighting any potential conflicts and measures to mitigate these, and ensuring the Plan is aligned with the principles of sustainable development.
- Equalities Impact Assessment to ensure the document has been prepared in an inclusive manner, and to identify any impacts on specific groups of race, gender, disability, age or religion.

Engagement with key stakeholders including consultation on:

- Core Strategy criteria-based Policy SP6 (2011)
- Call for Sites 2010, 2011, 2012

Evidence Base

5.2. In September 2011 the Council commissioned the Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford to produce a Gypsy, Traveller and Travelling Showpeople Needs Assessment (GTAA) for the district to replace the study formally undertaken by David Couttie Associates in 2006.

5.3. The GTAA for Sevenoaks was completed in March 2012, and forms key part of the evidence base for the preparation of the Gypsy and Traveller Plan. It considered the need for permanent pitches in Sevenoaks District in the period 2012-2026. Table 1 sets out the identified need. The assessment of need was based on interviews with over 50% of existing site-based households currently living in the District, interviews with 20 gypsy and traveller families in bricks and mortar housing and engagement with key stakeholders (see table 1). Households on unauthorised sites and sites with temporary

permission were considered by the study to identify their immediate and future needs for permanent pitches. As the assessment sought to identify the need for permanent site-based accommodation, households living on pitches with temporary planning permission were considered to constitute part of the figure for the number of pitches that need to be allocated. Granting permanent permissions for existing temporary pitches would contribute towards achieving the need identified, and is considered as a potential supply option in this consultation.

Table 1: Identified Need in Sevenoaks District

Period	Not applying planning definition	Applying planning definition
2012 - 2016	44	40
2017 - 2021	16	15
2022 - 2026	18	17
2012 - 2026	78	72

5.4. As identified in paragraph 3.3 of this document, the planning definition of gypsy and traveller excludes households that have stopped travelling for reasons other than their own family's or dependants' educational or health needs or old age. There is no clarification provided in national policy on when a household is considered to have 'stopped travelling'. However, the GTTAA asked households how often they travelled and if they no longer travelled why this was the case. The assessment was, therefore, able to estimate those existing households that no longer met the planning definition of a gypsy and traveller and reduce the identified need accordingly.

5.5. The study identified that Sevenoaks District has a sufficient provision of sites for Travelling Showpeople to meet the requirements of the plan period and therefore these figures only include those that meet the planning definition of gypsies and travellers.

5.6. Since the assessment was carried out 1 additional permanent pitch has been granted in the District by appeal at Land at Marwood House, Stones Cross Road, Crockenhill (SE/11/02166/FUL), as a result the residual need for permanent pitches is 71 in the period 2012-2026, if the planning definition analysis is applied.

Consultation Questions - Evidence Base

Q3 Do you consider that the Needs Assessment is robust and that the figure of 72 pitches to be provided in the period 2012-2026 is appropriate?

Q4 Is the Council correct to plan for Gypsies and Travellers that meet the planning definition?

Call for Sites

5.7. Calls for gypsy and traveller sites to be put forward to the Council were included in the Allocations (Options) consultation in 2010 and the Development Management: Draft Policies for Consultation in 2011. Following this, 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.

5.8. A third Call for Sites was undertaken in August 2012. This involved contacting Gypsies and Travellers living in the District, Gypsy and Traveller organisations and all those who registered an interest in the issue through consultations as part of the LDF. Parish and Town Councils were also contacted for their views on any potential sites within their areas.

5.9. Discussions have also been held in-house with Housing, Property, Development management and Enforcement Teams to suggest potential sites in SDC ownership or others than may come forward through the planning system. Discussions have also taken place in a similar manner with KCC regarding the potential for any sites, or extension to existing sites that could be put forward to assist with meeting the identified need for Sevenoaks District.

Duty to Co-operate

5.10. Section 110 of the Localism Act 2011 places a 'Duty to Cooperate' (hereafter 'The Duty') on Local Planning Authorities when preparing development plan documents. The Duty requires constructive, active engagement on an on-going basis to support all activities relating to a strategic matter.

5.11. The Council have participated in discussions with neighbouring authorities since early 2012 with regard to setting a common approach to the methodology for identifying and delivering need. The Council jointly commissioned Salford Housing and Urban Studies Unit (SHUSU) at the University of Salford to produce a GTTAA in 2012 with Maidstone Borough Council. Since this time, a number of local authorities across Kent have since commissioned Salford University to undertake their needs assessments so as to provide a common evidence base across the county.

5.12. In May 2013, the Council conducted a meeting with neighbouring authorities to understand what their individual provision requirements are, where they are in the plan preparation process, and how they intend or anticipate meeting these requirements. These discussions did not result in any expressions of interest or willingness from neighbouring authorities to support SDC in the provision of our identified need.

Consultation Question - Duty to Co-operate

Q5 Is your Local Authority willing and able to assist Sevenoaks DC in meeting the identified need in Sevenoaks District?

6. Site Assessment Criteria

6.1. This section sets out the approach taken to considering how the unmet needs of the District could be met, whilst ensuring appropriate consideration is given to constraints impacting upon the District.

6.2. The search for potential sites has looked at a number of sources:

- Proposed Allocations - as put forward in the Allocations and Development Management Plan
- Existing temporary sites
- Increasing capacity within existing permanent sites
- Extending existing public sites
- Suggested sites identified in the "call for site" exercise, and
- Currently unauthorised sites

6.3. It is proposed that potential sites should be assessed using a criteria-based approach in order to determine the suitability of each site. These criteria take into consideration national and local policy as set out in the NPPF, the national Planning Policy for Traveller Sites (PPTS), the CLG Designing Gypsy and Traveller Sites Good Practice Guide 2008 and the Core Strategy 2011. They also reflect a range of environmental, economic and social factors.

6.4. Gypsy and Traveller needs for accommodation are invariably different to that of the settled community, but the consideration of location should be similar in many ways, and have regard to the potential health, welfare and social impacts that may be caused as a result of the location.

Assessment Criteria

6.5. It is the Council's preference that potential sites meet all the below criteria. However, due to the previously mentioned planning and landscape constraints across the District, it may not be possible for all criteria to be satisfied. It may be necessary to prioritise some criteria over others to ensure that the most suitable sites are put forward as potential options to meet the requirements. Therefore, a site will not necessarily be ruled out if it fails to meet one of the criteria if sufficient justification can be put forward to satisfy other criteria considerations. In addition to being suitable in accordance with the criteria in Policy SP6, sites also need to be available and achievable.

Criteria

Location & Key Constraints

- a. The site is not located in the Green Belt
- b. The site is not located within an area at high risk of flooding, including functional floodplains.

c. The site should be located within or close to existing settlements with a range of services and facilities and access to public transport. This is specifically related to access to appropriate health services and ensuring that children can attend school on a regular basis and reducing the need for long-distance travelling. It should avoid placing undue pressure on local infrastructure and services.

d. The site will provide an acceptable living environment for future occupants in terms of noise, air quality and privacy and is relatively flat

e. The development will have no significant adverse impact upon the landscape, biodiversity or heritage asset. In the AONBs, sites should only be allocated where it can be demonstrated that the objectives of the designation will not be compromised.

f. Alternative priority land uses do not exist

Impact and Design

g. Responds to local character and reflects the identity of the local surroundings and will support peaceful and integrated co existence with the local community.

h. The site would or is capable, with mitigation, of securing good standards of amenity for existing residents.

i. The site is of a scale appropriate to accommodate the facilities required. In accordance with national policy (PPTS Policy F), wherever possible, Local Planning Authorities should include traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants. The sites should be able to accommodate a large mobile touring caravan, parking for 2 vehicles, utility building small garden area per household - 500 square metres.

j. Safe and convenient vehicular and pedestrian access can be provided to the site

Deliverability

k. The site is deliverable. The ease of acquisition is considered along with indicative costing of bringing the sites forward for development.

Considerations for the deliverability of the site will include:

- Whether or not the site is currently allocated for an alternative land use
- The ownership - private (non-gypsy/gypsy) or public
- Anticipated delivery costs

Consultation Questions - Criteria

Q6 Do you consider these to be an appropriate set of criteria to determine the suitability?

Q7 Do you feel any other criteria should be considered?

Q8 How do you consider that these criteria should be weighted?

Green Belt

6.6. The Metropolitan Green Belt covers 93% of Sevenoaks District. Core Strategy Policy SP6 'Provision for Gypsies and Travellers and Travelling Showpeople' states that "alternatives should be explored before Green Belt locations are considered". This therefore presents a large constraint to meeting the identified need.

6.7. National policy dictates that Gypsy and Traveller pitches are inappropriate development within the Green Belt. However, as with other forms of inappropriate development in the Green Belt, if very special circumstances exist then development may be acceptable. The lack of suitable sites outside of Green Belt land to meet identified needs could contribute to the justification of very special circumstances. All the existing sites in the District are in the Green Belt. It is therefore reasonable to explore Green Belt land if all other alternatives have been fully explored and exhausted before such sites are considered.

6.8. Previously the Council have lost appeal decisions due to the weight Planning Inspectors have given to the issue of identified need that has not been met. National Planning Policy (PPTS para.27) makes it clear that opportunities can arise for the granting of permanent pitches if an up-to-date five year supply of deliverable sites can not be demonstrated. Planning Policy for Traveller Sites also suggests that exceptional limited alterations to the Green Belt might need to be made through the plan-making process and allocated for a Gypsy and Traveller sites. However, the Council will consider the circumstances of each site option to determine where this may be an appropriate approach. The Council will seek to maintain the extent of the Green Belt wherever possible.

Areas of Outstanding Natural Beauty

6.9. Great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONBs). Gypsy and Traveller sites are not precluded from being located within Areas of Outstanding Natural Beauty. However, in order to comply with policy on AONBs, a site must not have an adverse impact on landscape and scenic beauty. In some circumstances it will be possible to overcome an impact through screening that is consistent with the local character. However, in other circumstances sites will be so visible in the landscape that no amount of mitigation will be able to overcome the impact. As the most suitable sites are selected going forward in subsequent stages of the Gypsy and Traveller Plan preparation, any design and layout guidance will need to consider how any impacts can be suitably mitigated, if possible.

Access to Services and Impact on Infrastructure

6.10. In terms of sustainability, sites for Gypsy and Traveller pitches would ideally be located within or close to existing settlements with a range of services (i.e. those defined as service villages or higher in the Settlement Hierarchy). The distribution of new Gypsy and Traveller pitches throughout the district should be considered. Concentrations in particular parts of the district could put a strain on infrastructure and public services and it would not be reasonable to further exacerbate any problems.

6.11. All sites have been assessed for their relative accessibility to key services, such as GP surgery, local shop, primary school and bus service, and their relative remoteness from such services. This is primarily because there are no agreed distance thresholds contained within national or local policy which can be used to reject sites purely on these grounds. Local authorities are also advised in the relevant circulars to be realistic about the availability of alternatives to the car in accessing local services.

Identifying Suitable Sites

6.12. In order to meet the identified need for a further 71 pitches to 2026 (accounting for the 1 pitch already delivered since 2012), the Council needs to identify suitable and deliverable sites to underpin this supply. The potential categories of sites are outlined in Table 2 below. These should be viewed as a series of interrelated options, as it is likely that a number of these approaches will be needed to meet the identified need.

6.13. The consultation presents an initial assessment of the site options proposed to the Council and identified by it. Inclusion in this document does not necessarily mean that a site will be taken forward as the plan progresses to examination and adoption. The Council will positively consider any proposed alternatives to the sites in this consultation document.

Table 2: Potential Categories of Sites

Potential Sources of Sites	Points of Consideration
Extensions to existing public authorised sites.	The existing public authorised sites in the District will require assessment in terms of the potential for expansion on to adjacent land, or through redevelopment or intensification within existing boundaries. The national good practice guidance 'Designing Gypsy and Traveller Sites' (2008) suggests in paragraph 4.7 that a maximum of 15 pitches for a site is conducive to providing a comfortable environment and this will be a consideration in determining the Council's final proposals. Sites should not have an adverse impact on the development of the remainder of the site or on the amenity of neighbouring land uses.
Examining whether existing temporary sites are suitable to be made permanent.	All of the sites are privately owned and it will be up to occupiers on the sites and/or landowners to submit planning applications. All applications will be assessed against their conformity with the Core Strategy and Local Plan policies as well as any applicable site specific criteria.

6. Site Assessment Criteria

Examining additional capacity on existing, private sites	The national good practice guidance 'Designing Gypsy and Traveller Sites' (2008) suggests in paragraph 4.7 that a maximum of 15 pitches for a site is conducive to providing a comfortable environment and this will be a consideration in determining the Council's final proposals.
Use of part of the sites allocated in the ADMP	The viability of including this land use at this site will need to be considered. The national good practice guidance 'Designing Gypsy and Traveller Sites' (2008) suggests in paragraph 4.7 that a maximum of 15 pitches for a site is conducive to providing a comfortable environment. Sites should not have an adverse impact on the development of the remainder of the site or on the amenity of neighbouring land uses.
Examining whether unauthorised sites are suitable in planning terms to be allocated and made permanent for this land use.	Consideration will need to be given to the reasons why any unauthorised sites may not have been granted planning permission. Granting permanent permission for these sites could be seen as circumventing the planning process.
Allocating new sites that have come forward through the Call for Sites process.	Any new sites will need to be assessed against the criteria set out in section 4. The national good practice guidance 'Designing Gypsy and Traveller Sites' (2008) suggests in paragraph 4.7 that a maximum of 15 pitches for a site is conducive to providing a comfortable environment.

6.14. The Government recognises that whilst more private traveller site provision should be promoted, it is likely that there will always be those Travellers who cannot provide their own sites. Therefore, by utilising a range of site types to meet the identified need, a range of tenures can be provided for.

Consultation Questions - Approach to Meeting Pitch Requirements

Q9 Do you consider the approach to the way in which our future pitch provision may be met is appropriate?

Q10 Are there any alternative ways in which the pitch requirements can be met?

7. Potential Site Options

7.1. All sites that have come forward through the sources outlined in paragraph 6.2 have been subject to initial assessments against the criteria noted in paragraph 6.5 on grounds of their suitability to potentially provide Gypsy and Traveller accommodation.

Potential Capacity

7.2. In order to understand whether or not the site options being assessed are able to potentially accommodate the requirement for the District, a potential capacity of each site has been put forward having had regard to several factors. These are:

- The number of existing temporary pitches on the site
- The number of pitches promoted on the site during the various call for sites
- The governments guidelines on an appropriate number of pitches to manage for an entirely new site
- The number of existing permanent pitches already on the site
- The government's guidance on an average pitch size

7.3. For some sites, the total capacity includes both current temporary pitches and proposed additional pitches.

7.4. Following such initial assessments, Table 3 below lists the sites considered to be potentially suitable options to consider allocating for the permanent use as Gypsy and Traveller accommodation. These site options and associated potential number of pitches are what the Council is now seeking views on. Appendix 1 includes information on the location of each site, their current status, and the potential capacity for additional pitches.

Table 3: Potential Site Options

Site details	Current status of site and how identified	Proposed no. additional permanent pitches for potential allocation	Total number of pitches on site (including existing permanent)
Holly Mobile Home Park, Hockenden Lane, Swanley	Temporary	3	3
Robertsons Nursery, Goldsel Road, Swanley	Temporary	1	1
Malt House Farm, Lower Road, Hextable	Temporary	1	1
Land adj. Valley Park South, Lower Road, Hextable	Call for sites	5	22 - This consists of the 17 pitches permanently permitted on the site, and an additional 5 being proposed

7. Potential Site Options

Hilltop Farm, London Road, Farningham	Temporary	5	5
Land East of Knockholt Station, London Road, Halstead	Temporary	12	12 - This consists of 6 currently temporary pitches and an additional 6 promoted during the 2012 call for sites
Land at Fort Halstead, Halstead (outside of Major Developed Site boundary)	Identified by the Council through Local Plan Allocations discussions	15	15
Land South of Mesne Way, part of Timberden Farm, Shoreham	Identified by the Council as landowner	15	15
Eagles Farm, Crowhurst Lane, West Kingsdown.	Both temporary and permanent pitches	4	6 - This includes 2 permanent pitches, 2 currently temporary pitches, and 2 additional pitches promoted during the 2012 call for sites.
Hollywood Gardens, School Lane, West Kingsdown	Temporary	1	1
Early Autumn, East Hill Road, Knatts Valley	Permanent - call for sites	1	3 - This consists of 2 existing permanent pitches, and 1 additional pitch promoted during the 2012 call for sites
Fordwood Farm, New Street Road, Hodsoll Street	Temporary	1	1
Seven Acre Farm, Hever Road, Edenbridge	Temporary	7	7
TOTAL proposed additional pitches:		71	

7.5. The Council hopes that additional pitches will be proposed through this consultation. This would put the Council in a strong position to be able to make sound, well informed choices about which of the options are the most suitable going forward. It is not simply the case that all of the sites proposed must be taken forward in later versions of this plan and through to examination and adoption.

7.6. For some of these site options, the development of the number of pitches would not require development on the whole site. Views are therefore also welcomed on what areas are considered to be the most appropriate locations within these sites.

Site with Live Planning Applications

7.7. Land West of Button Street, Swanley (Farningham, Horton Kirby and South Darenth Ward) has a live planning application to be determined. The application number is 13/03227/FUL. It would not be appropriate to pre-empt the planning process and make an initial assessment of suitability at this stage until the application has been determined. Therefore, whilst the Council has undertaken an assessment of the constraints on the site, according to the assessment criteria, views are being sought alongside the other site options on the suitability of this site in providing any future pitches to help meet the identified need.

7.8. An application has been received by the Council in early March (2014) for Land at Pedham Place, London Road, Farningham for the provision of 5 pitches for Gypsy and Traveller accommodation. It is intended that this site will be assessed in the same way as Land West of Button Street, Swanley, without compromising the planning application process.

Consultation Questions - Site Assessments

Q11 Do you agree with the initial site assessments (see also the background site assessment document)? If not, why not?

Q12 Do you think the number of pitches proposed for each potential site option is acceptable? If not, why not?

Q13 Should any future residential site provision include any additional space for visitors?

7.9. The consultation presents an initial assessment of the site options proposed to the Council and identified by it. Inclusion in this document does not necessarily mean that a site will be taken forward as the plan progresses to examination and adoption. The Council will positively consider any proposed alternatives to the sites in this consultation document.

Consultation Question - Additional Sites

Q14 Can you suggest any additional sites that you consider suitable for use as Gypsy and Traveller sites?

Consultation Question - Travelling Showpeople

Q15 In view of the fact that there is currently no specific identified need for a Travelling Showpeople site in Sevenoaks, is there a need to provide additional capacity for Travelling Showpeople in the District?

Design and Layout Guidance

7.10. The Council recognise that any proposed allocation sites will require design and layout criteria to be considered as part of an individual site allocation, to ensure sufficient mitigation measures are included in the development process of each site. The Council are therefore seeking the views of interested parties on these matters.

Consultation Question - Design and Layout Guidance

Q16 What criteria considerations do you feel should be included, if any, into design and layout guidance to support proposed allocations?

8. Sites Considered Unsuited for Allocation

8.1. The following sites were also assessed according to the same suitability criteria as those proposed as site allocation options, but are currently deemed unsuitable for varying reasons. Table 4 below sets out the key reasons why these sites have been rejected at this stage in the process. Site assessments and plans are presented in the background evidence to this consultation document.

Table 4: Sites Considered Unsuited for Allocation

Site details	Key reasons
Land adj. Valley Park North, Hextable	The original site promoted during the 2012 Call for Sites included both this land and the site option being considered to the south. The originally promoted site included a new point of access from the highway into the site, and 25 additional pitches. After having assessed the site for the suitability of this level of additional pitches, it was not deemed suitable due to the number of existing pitches on the adjacent land, creating a potential cumulative impact on the landscape (also taking into account the adjacent site of 70-72 Lower Road).
Polhill Park, Polhill	The site owners have informed the Council that this site does not have any further capacity to accommodate pitches within the site, and does not have the potential to physically expand so is unable to provide any additional pitches by extending the site.
Fort Halstead, Halstead	The Council has commissioned and published an assessment of the viability of the landowner's emerging redevelopment proposals. This assessment finds that, whilst viable opportunities for the redevelopment of the site exist, many mixed use development scenarios that could re-provide the number of jobs on the site are of marginal viability. At present, it is, therefore, not considered that there is scope for introducing additional uses with relatively low development values, such as gypsy and traveller pitches, within a redevelopment of the Major Employment Site area. This issue can be kept under review as the Gypsy and Traveller Plan develops and plans for the redevelopment of the site evolve between now and 2018 when DSTL is expected to have relocated away from the site.
Valley Farm North, Carters Hill, Underriver	This site has planning permission (SE/13/01179/FUL) for the demolition of a dwelling and erection of a new dwelling, therefore is no longer being promoted for use as a Gypsy and Traveller site.
Valley Farm South, Carters Hill, Underriver	The site is currently in agricultural use in a very open area of landscape. It lies opposite two listed buildings; hence any development on this site would impact upon their setting. Whilst the site is better connected to the centre of Underriver, the area is not considered to be a sustainable location for any new development.
Land adj. Cricket Pavilion, Underriver	This is a very small site, very remotely located away from the centre of Underriver. The site would not be within walking distance to the limited facilities in Underriver. There is no planning history on this site for use for Gypsy and Traveller pitches, and developing this site would therefore set a precedent for this land use in the open countryside, green belt, and AONB.
Romani Way, Hever Road, Edenbridge	This site does not have any further capacity to accommodate pitches within the site, and does not have the potential to

8. Sites Considered Unsuitable for Allocation

	physically expand so is unable to provide any additional pitches by extending the site.
Deers Leap Farm, Four Elms Road, Edenbridge	The site is very open in the countryside, and very visible from the highway. The site does not benefit from any previous planning permissions for this land use. It is not connected to the local settlement of Four Elms, which in itself is not considered to be a sustainable location for new development. There is a vast planning enforcement history on this site, including a compulsory purchase order undertaken by the Council to ensure the land could be restored back to its original state. The land is not available and therefore not considered suitable or deliverable for Gypsy and Traveller accommodation for the reasons set out above.
Land West of Enterprise Way, Edenbridge	The Planning Inspector who was examining the Allocations and Development Management Plan (ADMP) has recommended a 'main modification' to the document, to allocate the identified site, land west of Enterprise Way, Edenbridge, for housing development, and therefore indicated that it would be incompatible for this site also to be considered for Gypsy and Traveller pitches.
Barnfield Park, Ash	The Council consider that this site is unsuitable for allocation for a variety of reasons relating to the scale of the existing site and the scale of the 'settled' community of Ash.

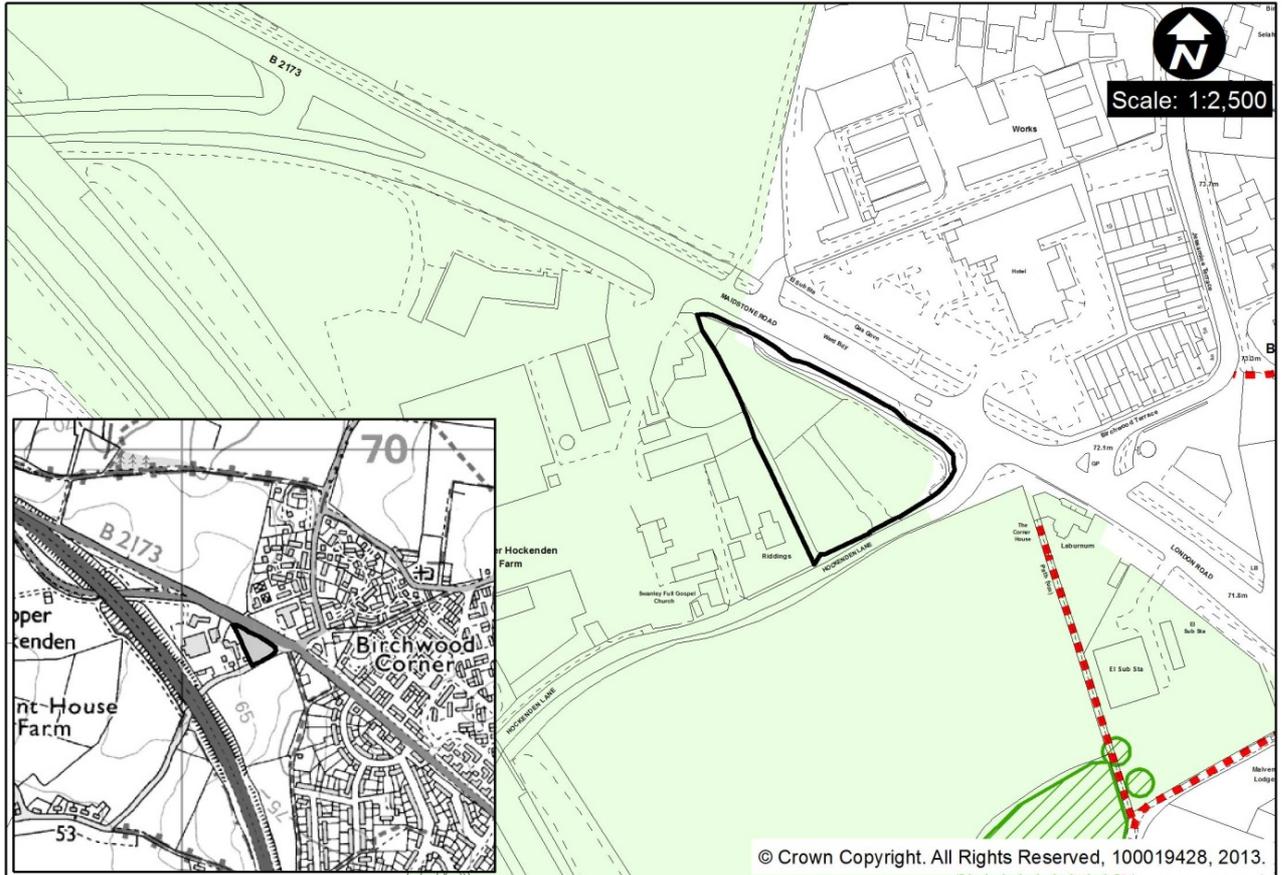
Consultation Question - Rejected Site Options

Q17 Do you agree with the rejected site options? If not, why not?

Appendix 1 - Site details for potential site options

Key	
	Potential Gypsy & Traveller Site Options March 2014
	Flood Zone 3a
	Flood Zone 3b
	Flood Zone 2
	TPO's
	Listed Building
	Public Right of Way
	Ancient Woodland
	Sites of Special Scientific Interest
	Scheduled Monuments
	Conservation Areas
	Local Wildlife Sites
	Area of Outstanding Natural Beauty
	Metropolitan Green Belt

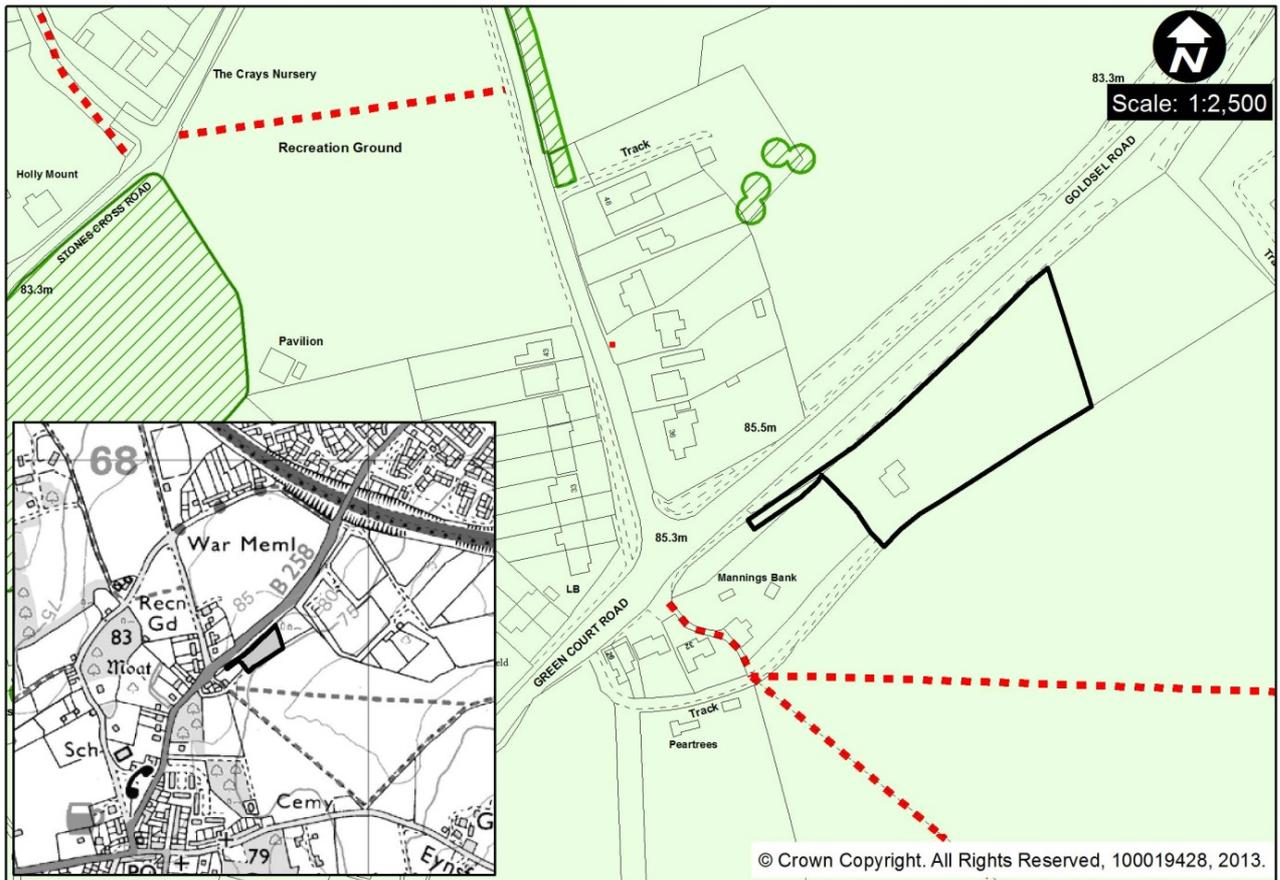
Holly Mobile Home Park, Hockenden Lane, Swanley



Current status:	Temporary site containing 3 pitches.
Proposed Number of permanent pitches to allocate:	3

Consult on as a potential allocation?

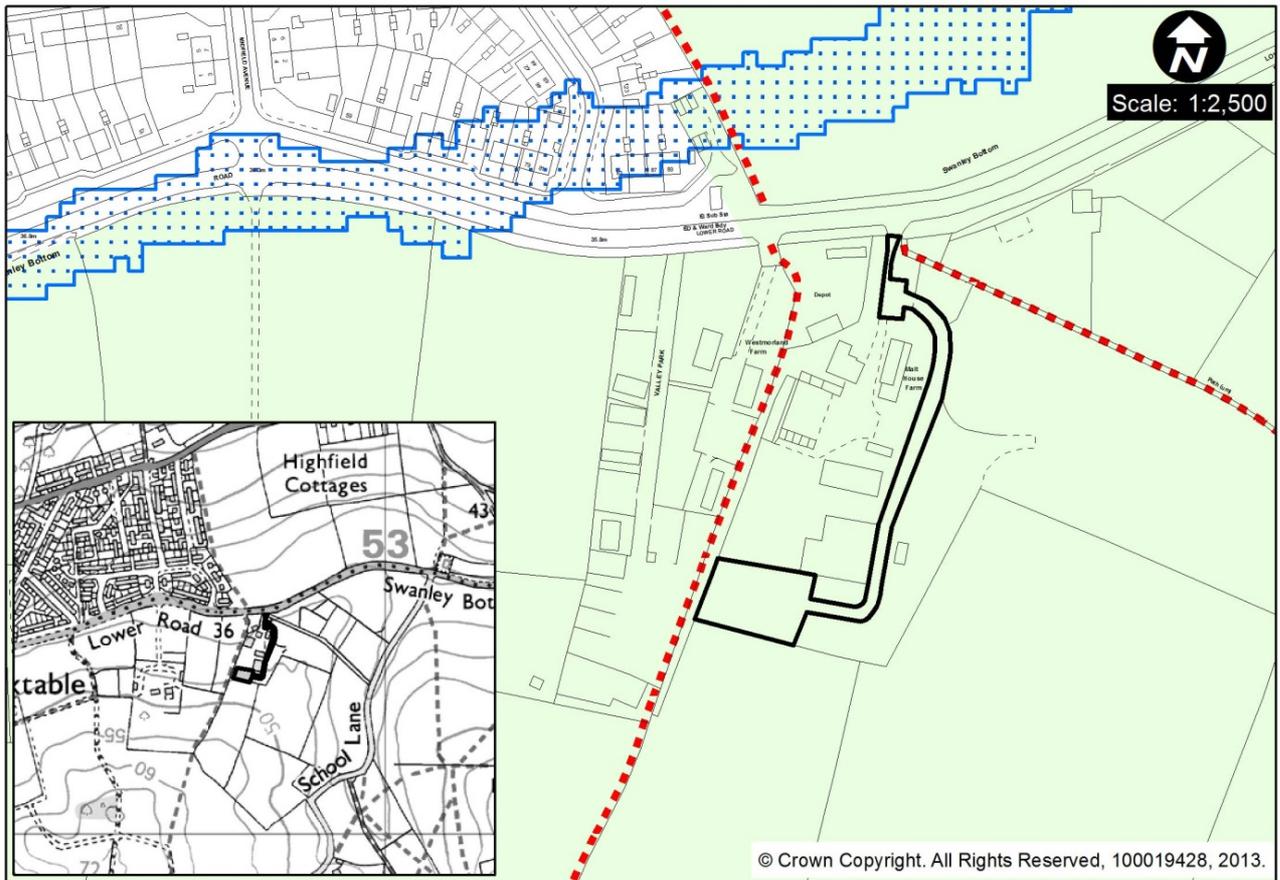
Robertsons Nursery, Goldsel Road, Swanley



Current status:	Temporary site containing 1 pitch.
Proposed Number of permanent pitches to allocate:	1

Consult on as a potential allocation?

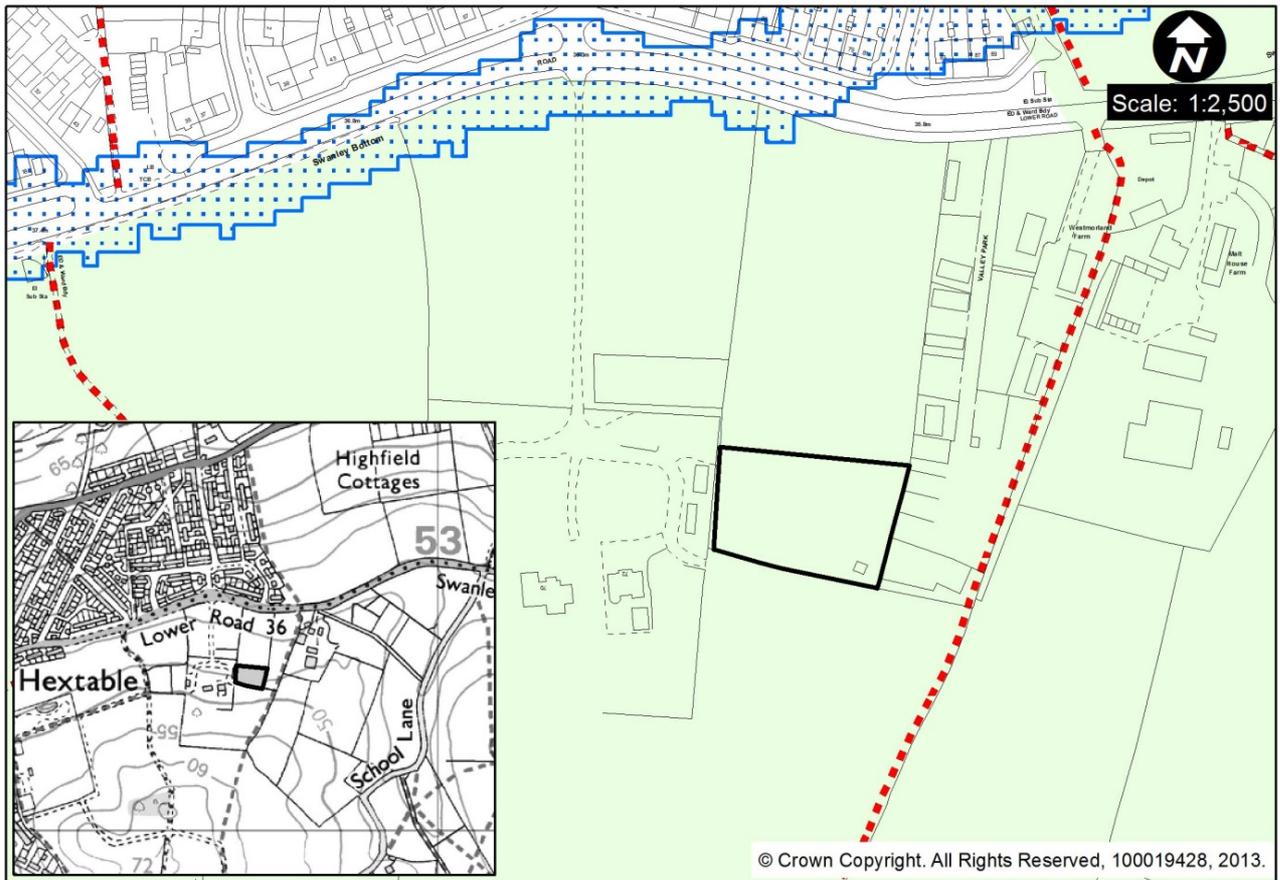
Malt House Farm, Lower Road, Hextable



Current status:	Temporary site containing 1 pitch.
Proposed Number of permanent pitches to allocate:	1

Consult on as a potential allocation?

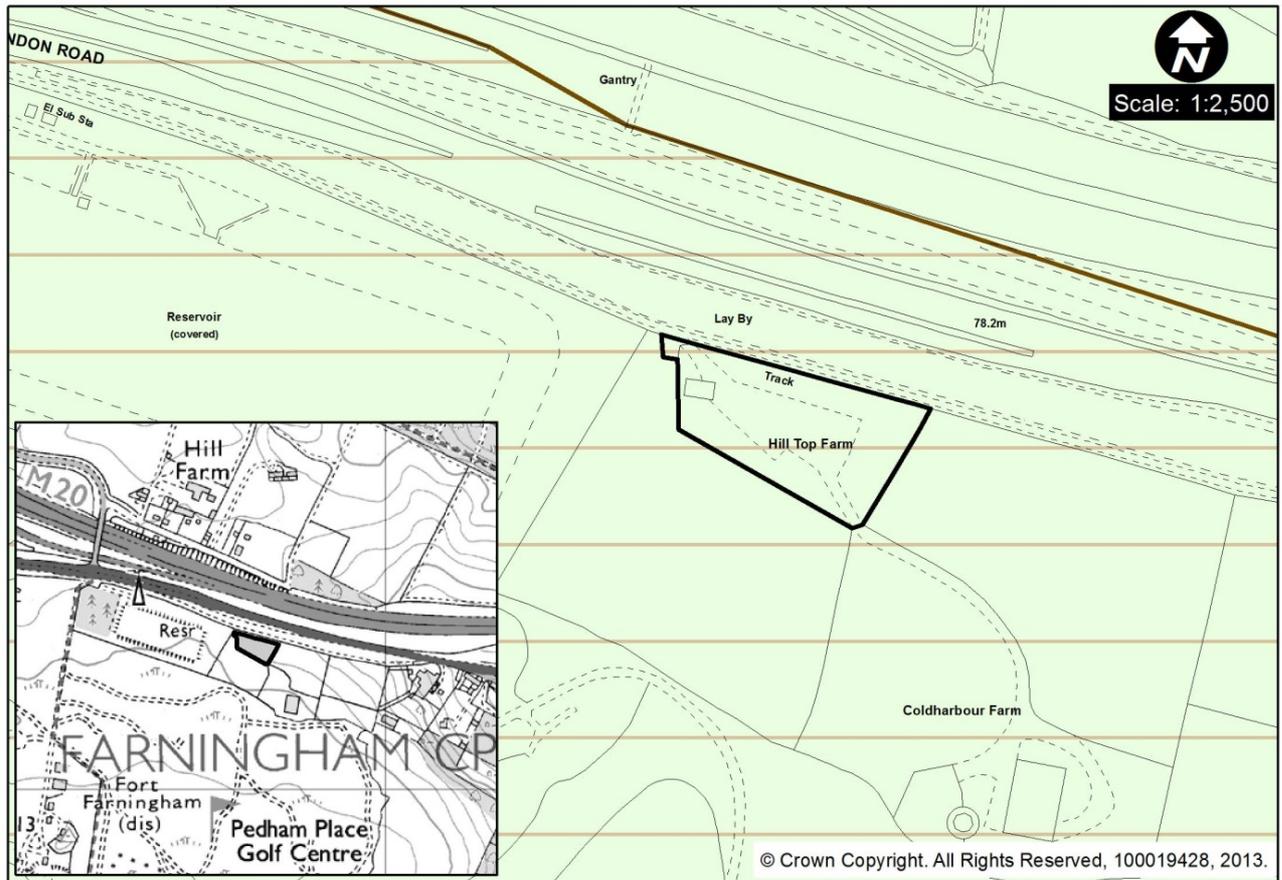
Land adj. Valley Park south, Lower Road, Hextable.



Current status:	Extension to existing site
Proposed Number of permanent pitches to allocate:	5

Consult on as a potential allocation?

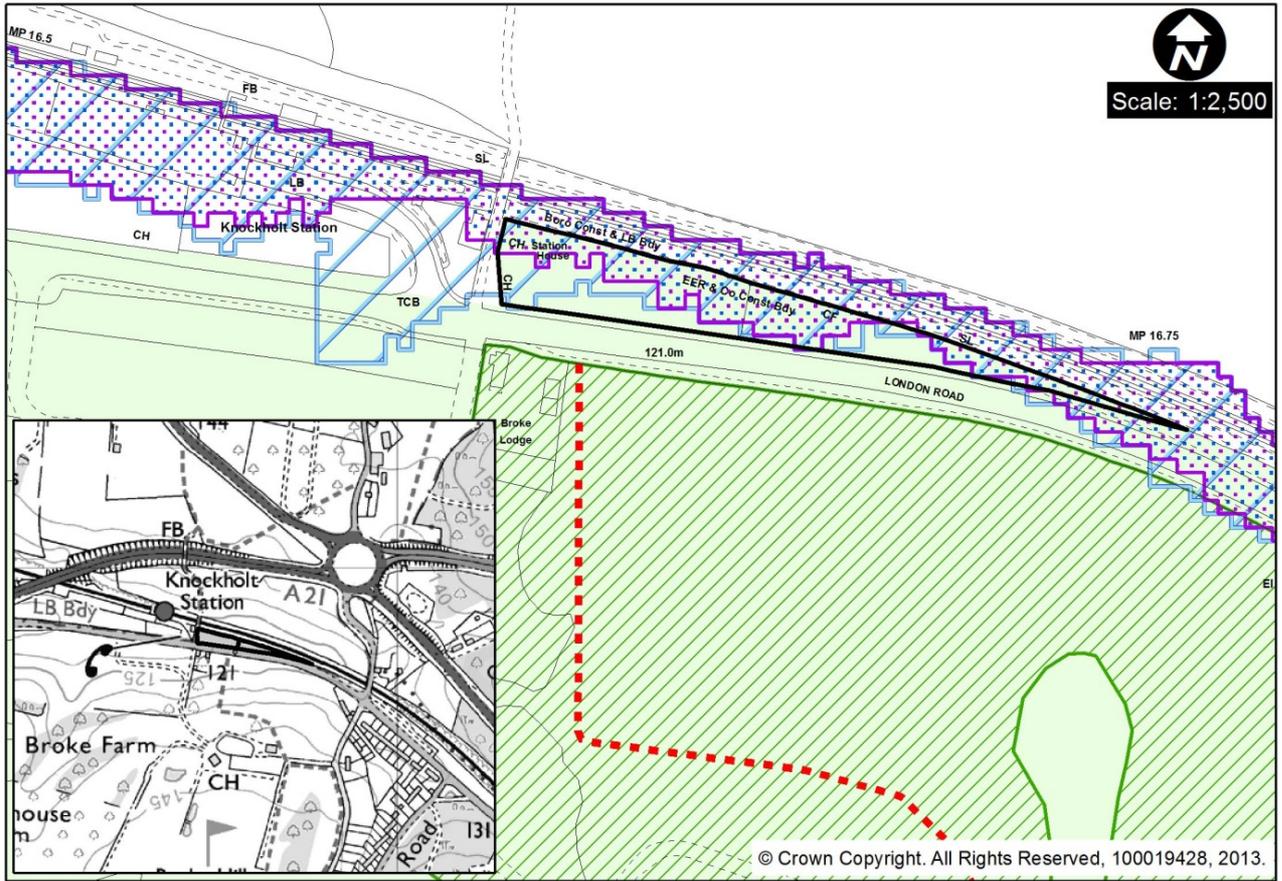
Hilltop Farm, London Road, Farningham



Current status:	Temporary site containing 5 pitches.
Proposed Number of permanent pitches to allocate:	5

Consult on as a potential allocation?

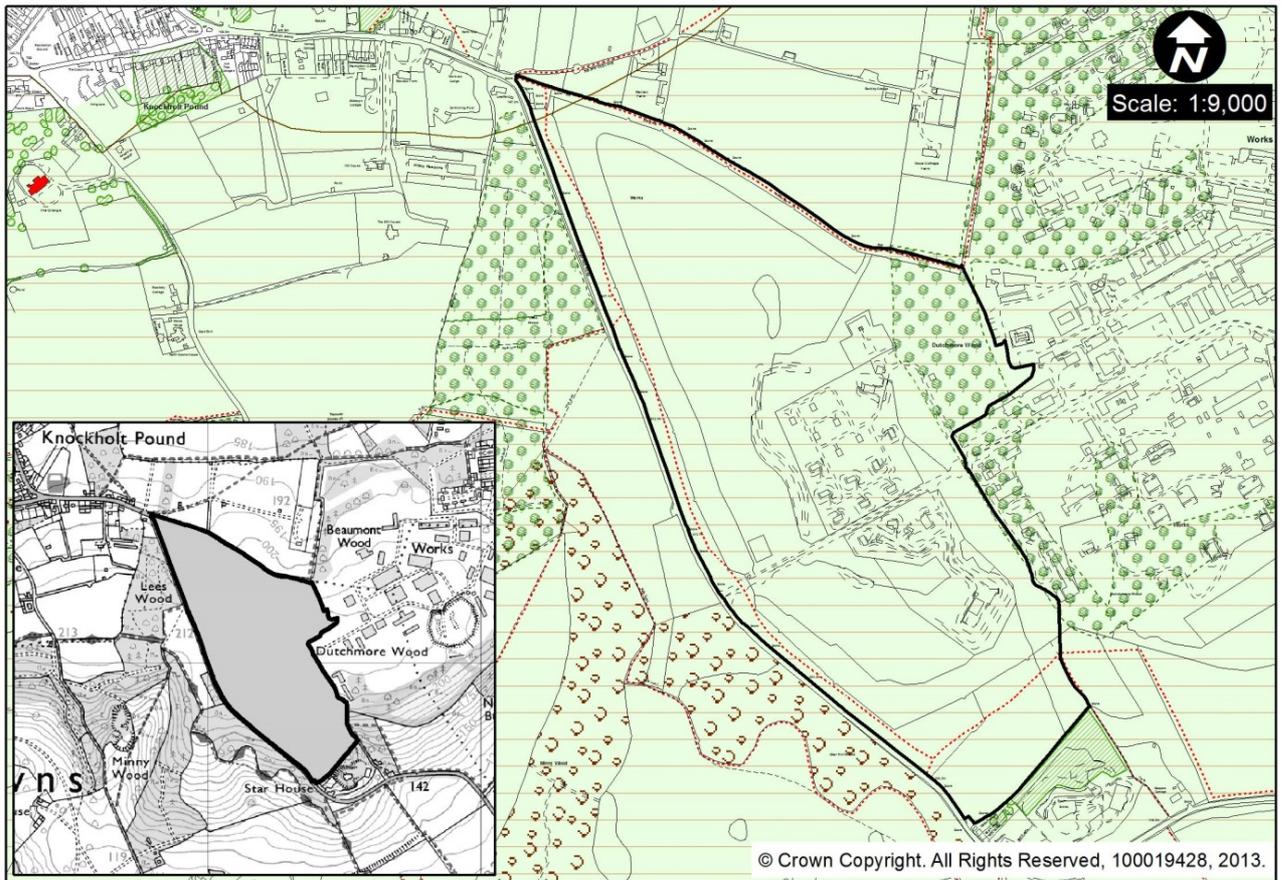
Land East of Knockholt Station, Halstead.



Current status:	Temporary site containing 6 pitches.
Proposed Number of permanent pitches to allocate:	12 - 6 temporary and 6 additional pitches to be made permanent

Consult on as a potential allocation?

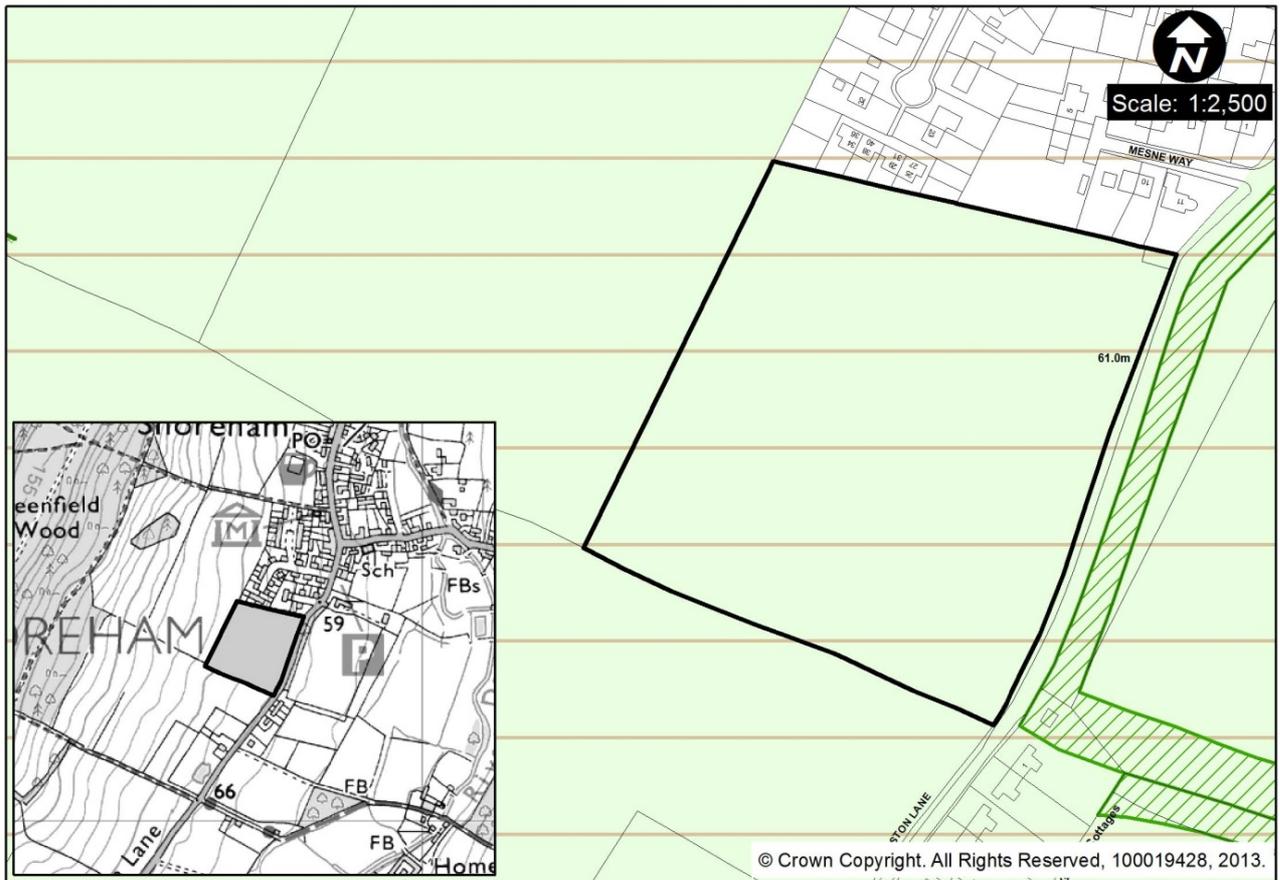
Land at Fort Halstead, Halstead (Outside of Major Developed Site Boundary)



Current status:	Part of Fort Halstead site outside of the developed area
Proposed Number of permanent pitches to allocate:	15

Consult on as a potential allocation?

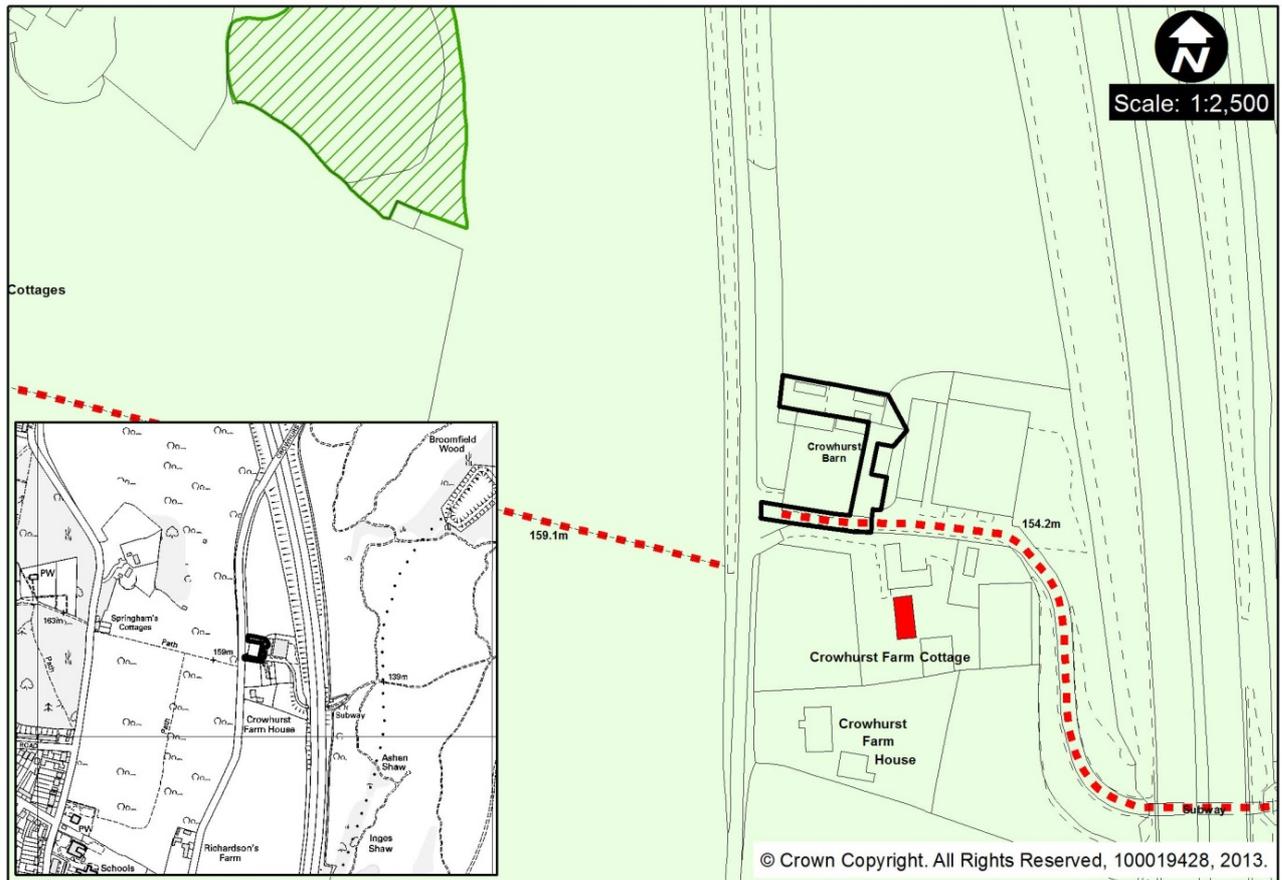
Land South of Mesne Way, part of Timberden Farm Shoreham



Current status:	Agricultural site identified through call for sites
Proposed Number of permanent pitches to allocate:	15

Consult on as a potential allocation?

Eagles Farm, Crowhurst Lane, West Kingsdown (Existing site)

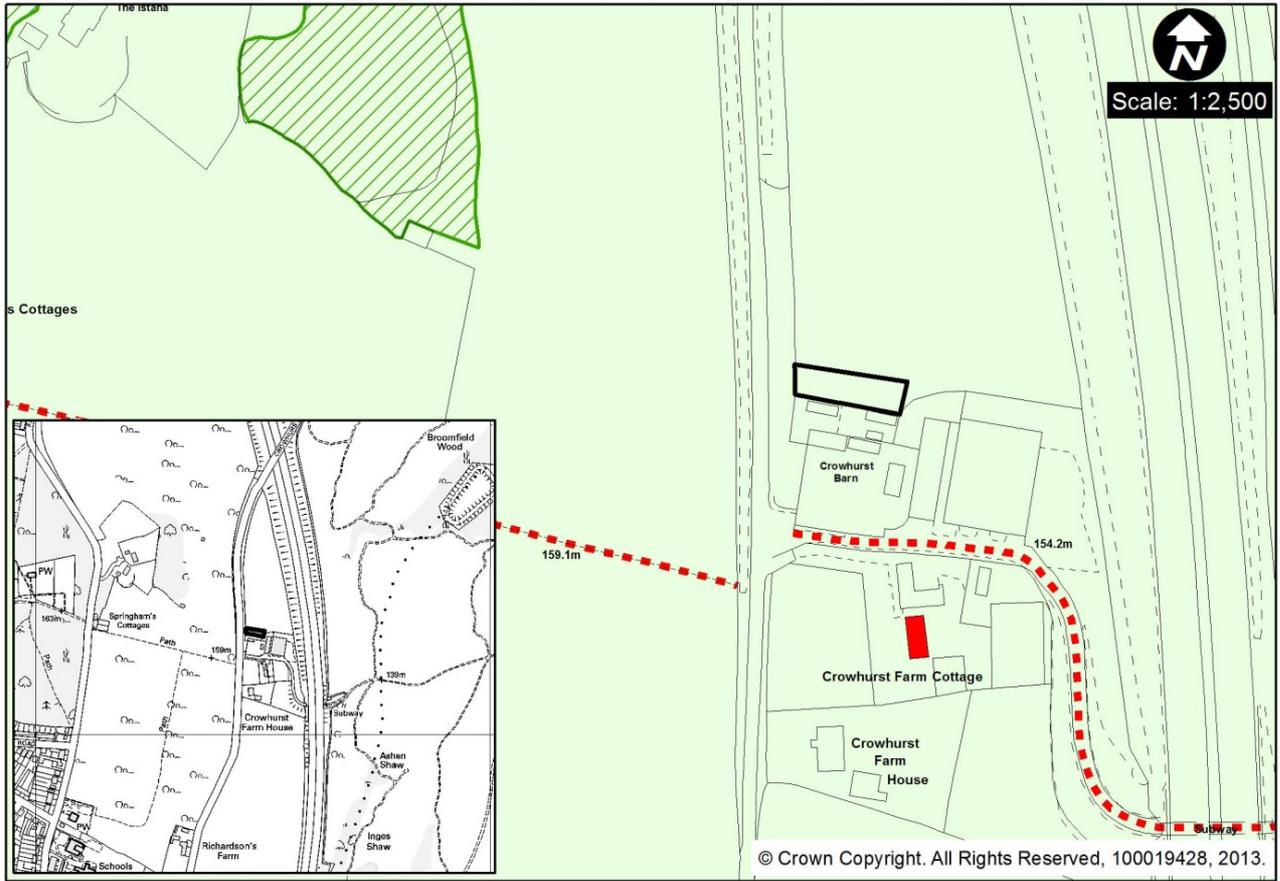


Current status of the site:	Temporary site for 2 pitches
Proposed Number of permanent pitches to allocate:	2

Consult on as a potential allocation?



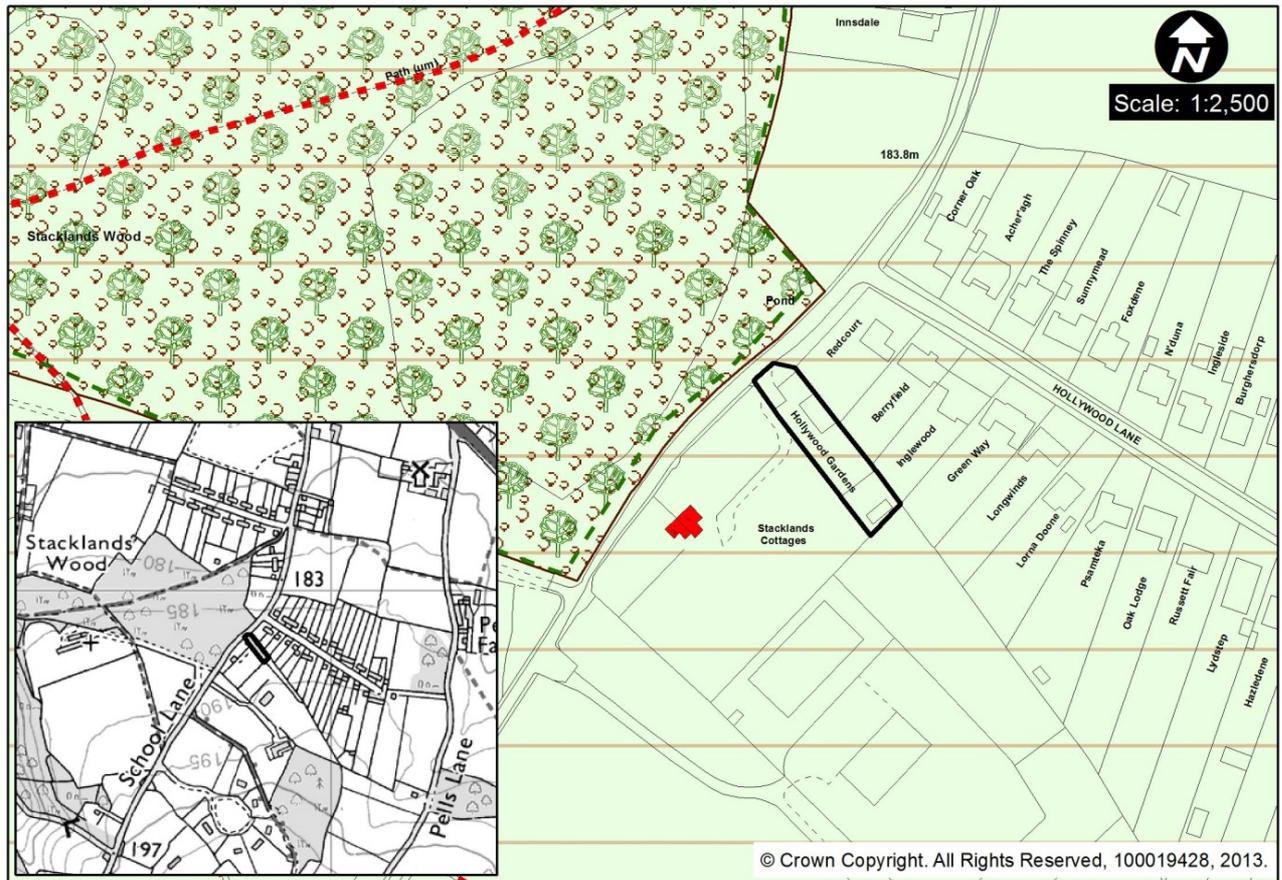
Eagles Farm, Crowhurst Lane, West Kingsdown (Extension)



Current status:	Additional pitches promoted through Call for Sites
Proposed Number of permanent pitches to allocate :	2

Consult on as a potential allocation?

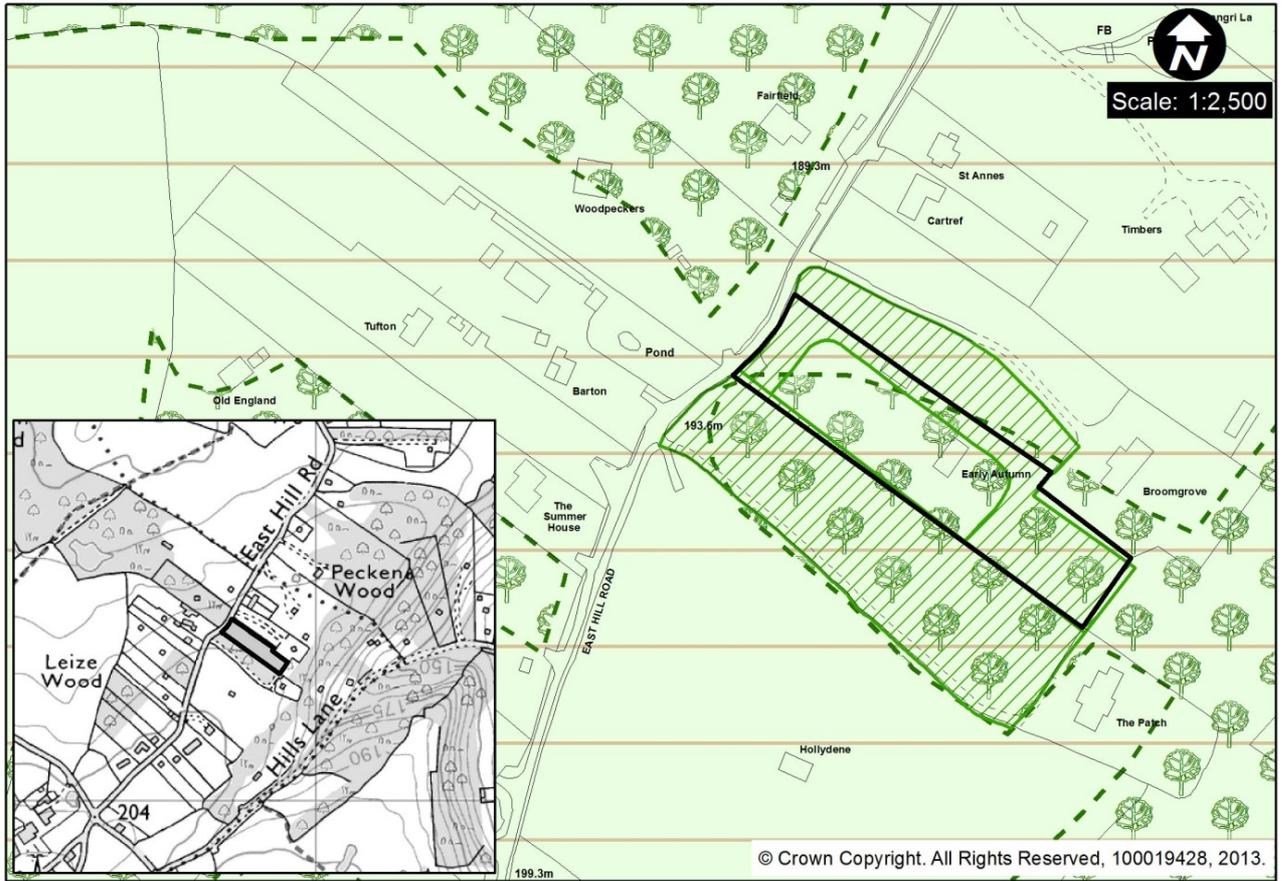
Hollywood Gardens, School Lane, West Kingsdown



Current status:	Temporary site containing 1 pitch
Proposed Number of permanent pitches to allocate:	1

Consult on as a potential allocation?

Early Autumn, East Hill Road, Knatts Valley



Current status:	Additional pitch on existing permanent site
Proposed Number of permanent pitches to allocate:	1

Consult on as a potential allocation?

Fordwood Farm, New Street Road, Hodsoll Street



Current status:	Temporary Permission for 1 pitch
Proposed Number of permanent pitches to allocate:	1

Consult on as a potential allocation?

Seven Acres Farm, Hever Road, Edenbridge



Current status:	Temporary site containing 7 pitches.
Proposed Number of permanent pitches to allocate:	7

Consult on as a potential allocation?

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