



Gypsy and Traveller Site(s) Local Plan

Intention to prepare a Local Plan:
Regulation 18 Consultation Report

DRAFT

March 2016

Copy for public consultation

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How do I comment?

The Council is inviting comments on the Gypsy and Traveller Site(s) Local Plan – Regulation 18 Consultation Report as part of a formal public consultation.

This consultation runs for 6 weeks from **XX** to **XX** 2016.

You can respond in the following ways:

- **On-line:** https://lewisham-consult.objective.co.uk/portal/planning_policy
- **E-mail:** planning.policy@lewisham.gov.uk
- **Post:** Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE6 4RU

You can also respond by completing a questionnaire which can be filled out:

- On-line https://lewisham-consult.objective.co.uk/portal/planning_policy

Or the questionnaire can be downloaded from our website:

- At www.lewisham.gov.uk/myservices/planning/policy/Pages/default.aspx

Copies of the document can be viewed on:

- the Council's website
www.lewisham.gov.uk/myservices/planning/policy/Pages/default.aspx
- inspected at all borough libraries and Council's AccessPoint, Ground Floor, Laurence House, Catford, SE6 4RU and obtained by contacting the Planning Policy Team on 020 8314 7400 who will also be happy to answer any questions you may have.

1. Introduction

- 1.1. The Housing Act 2004 requires authorities to assess the need for Gypsy and Traveller accommodation in their areas when they assess their overall housing requirements. In accordance with the Housing Act authorities must then develop a strategy which addresses the need arising from the accommodation assessment, through public or private provision.
- 1.2. London Plan Policy 3.8 (Housing choice) calls on boroughs to work with the Mayor of London and local communities to identify the range of needs likely to arise within their areas and to ensure (amongst other things) that the accommodation requirements of gypsies and travellers (including travelling show people) are identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.
- 1.3. Lewisham Core Strategy Policy 2 envisages that an additional gypsy and traveller site would be identified through the Sites Allocation Local Plan (SALP). However, it did not prove possible to include a site or sites in the SALP and the Council decided that a site or sites are identified in a Gypsy and Traveller Site(s) Local Plan (GTLP).
- 1.4. The Council consulted on a previous Regulation 18 consultation document for a GTLP in March 2013. However, other priorities meant that things did not progress as planned and preparation on a plan halted. This document supersedes the previous Regulation 18 document.
- 1.5. The Lewisham Gypsy and Traveller Accommodation Needs Assessment (GTANA) (June 2015) found that the provision needed to 2030 in Lewisham is for 6 additional pitches. Since the publication of the GTANA, the Government published its revised policy on planning for traveller sites (August 2015). This includes a new definition of 'gypsy and travellers' for planning policy purposes. To ensure a robust assessment of need, the GTANA was revised to take account of the current definition. The revised GTANA (February 2016) identifies a need for **TO BE ADDED** additional pitches up to 2030.

2. Purpose of the Gypsy and Traveller Local Plan (GTLP)

- 2.1. The GTLP is being prepared as a single-issue Local Plan in order to allocate a site or sites to meet the identified local accommodation needs of Gypsy and Traveller communities in the borough.

3. How the GTLP will fit in with Lewisham's planning framework

- 3.1. Lewisham's existing planning framework comprises the adopted Core Strategy (June 2011), Site Allocations Local Plan (June 2013), Lewisham Town Centre Local Plan (February 2014) and Development Management Local Plan (November 2014) and supporting Supplementary Planning Documents.
- 3.2. The Council is in the process of preparing a new integrated Local Plan which will eventually replace the existing Core Strategy, Site Allocations, Lewisham Town Centre and Development Management Local Plans. The GTLP will sit alongside the integrated Local Plan.
- 3.3. The existing and proposed Lewisham planning frameworks are summarised in Figures 3.1 and 3.2 below.

Figure 3.1: Existing Lewisham planning framework

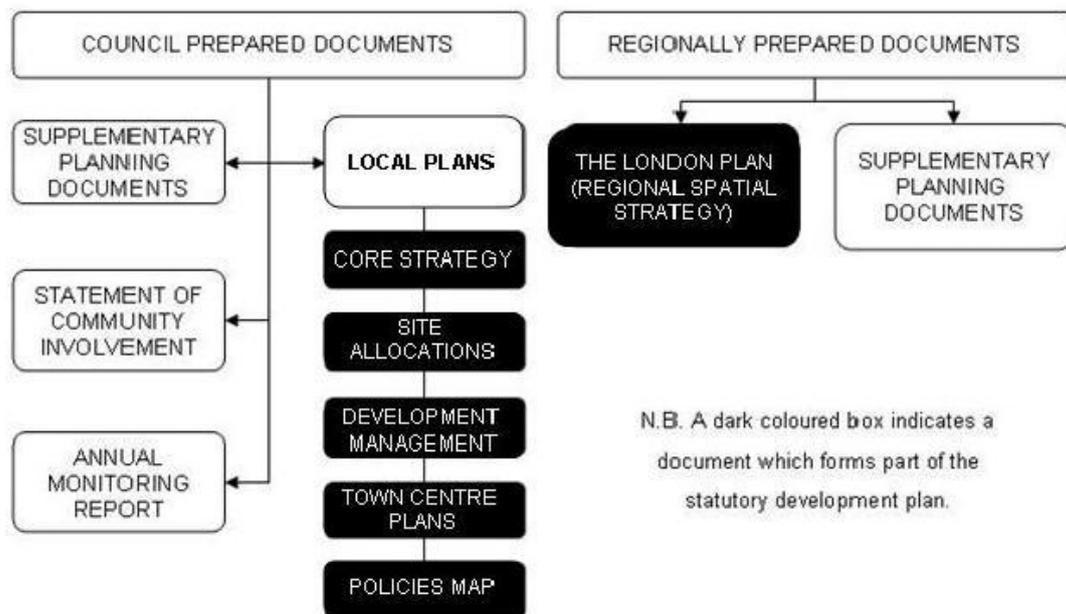
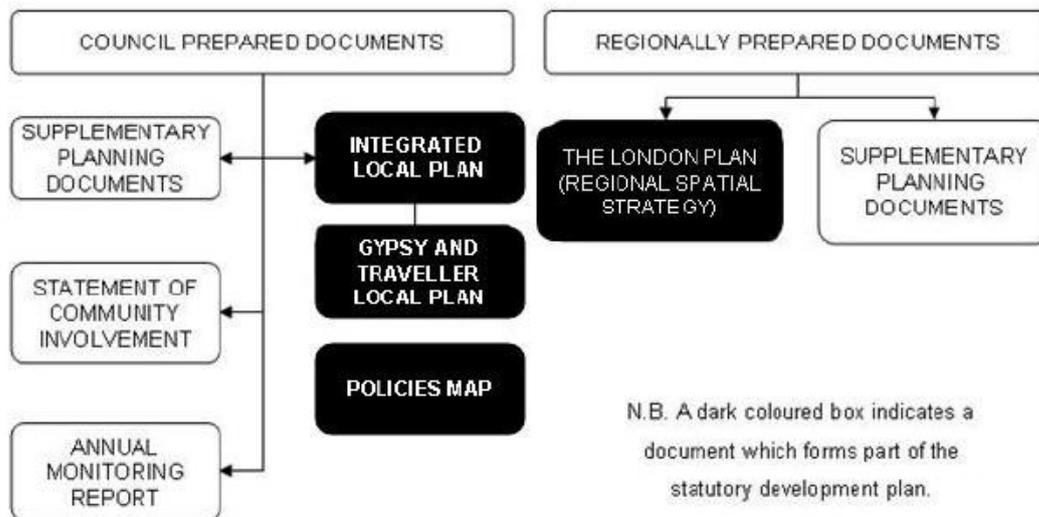


Figure 3.2: Proposed Lewisham planning framework



4.0 Process for preparation

4.1. The process for preparing statutory Local Plans, including the GTLP, is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 represents the first (statutory) stage in the process of preparing the GTLP. This specifically represents the “scoping” stage of the Local Plan preparation process, where Lewisham Council is asking key stakeholders what they think the GTLP should contain.

4.2. This report sets out the proposed scope of the GLTP (in 2.1 above), the proposed Search Parameters and Selection Criteria to be used to identify a site or sites (in Section 5 below) and the proposed timetable for preparing the Plan. Its purpose is to invite representations from organisations and local residents and businesses about all of these issues.

4.3. The Council will take into account any representations made in response to this consultation when preparing the Local Plan.

Evidence Base

4.4. A robust evidence base is required to inform and support Local Plans. The following relevant evidence base documents have been completed or are underway:

- Lewisham Gypsy and Traveller Accommodation Needs Assessment (GTANA) (June 2015) as revised February 2016;
- Lewisham Infrastructure Delivery Plan (2010) – under review with an IDP Framework Document being prepared in October 2015;
- Strategic Flood Risk Assessment Update 2015;

- CLG Designing Gypsy & Traveller Sites Good Practice Guidance (May 2008); and
- London Gypsy & Traveller Sites Working Paper on Net Density and Gypsy and Traveller Sites (July 2009).

Sustainability Appraisal

- 4.5. The GTLP will be subject to a Sustainability Appraisal (SA) which is an integral part of the plan preparation process. An SA involves identifying and evaluating a plan's impacts and assessing the social, environmental and economic impacts to help ensure that the plan accords with sustainable development principles. The Council is consulting on an SA Scoping Report at the same time as consulting on this document. You can see and comment on the SA Scoping Report by [ADD LINK & DETAILS](#).

Localism and the Duty to Co-operate

- 4.6. The Localism Act (2011) introduced a Duty to Co-operate which requires planning authorities and other public bodies to actively engage and work jointly on strategic matters. The Council will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies to ensure that strategic priorities are reflected and, where appropriate, addressed in the Local Plan.

5.0 Proposed Search Parameters and Selection Criteria

Proposed Search Parameters

- 5.1 Set out below is a discussion of the proposed parameters for searching for a suitable site or sites.
- 5.2 Council-owned housing land. Land held by the Council for housing purposes is clearly suitable, in principle, as a gypsy and traveller site, which is a form of housing. As such, LBL Housing land is to be included in the search.
- 5.3 Council-owned non-housing land. Land held by the Council for non-housing purposes may be suitable as a gypsy and traveller site, and as such, LBL non-housing land is to be included in the search.
- 5.4 Private and other publicly owned land. The Government's policy on gypsy and travellers (August 2015) seeks to promote more private traveller sites. However, the housing market in Lewisham and London is currently very buoyant, and some sources suggest that values are likely to increase by about 20% over the next five years.

- 5.5 Given this and recent Government initiatives to encourage additional housing, it is considered very unlikely that private or other public landowners would choose to bring forward and manage a gypsy and traveller site. In any event, the Council does not have resources available to buy additional land for the purposes of developing a gypsy and traveller site.
- 5.6 For these reasons, it is proposed to focus on Council owned property, other than, possibly, adjacent land in other ownerships that may be necessary to develop a Council asset.
- 5.7 One or more sites? The GTANA (June 2015), identified a need for 6 pitches over the period to 2030. This is a relatively small number and for practical considerations of site management and economic considerations the Council consider this need should be met on a single site.
- 5.8 Type of site. The intention is to consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and any combination.
- 5.9 Size of site. The findings of the 'Net Density and Gypsy & Traveller Sites' working paper, prepared by the London Gypsy & Traveller Unit in (July 2009), suggest that for a new site in Inner London, the density should be within the range of 14 to 25 pitches per hectare (between 400 and 714sqm per pitch). Taking account of this and other advice in this working paper, the requirements set out in the CLG 'Designing Gypsy & Traveller Sites' Good Practice Guidance (May 2008), the Government's PPTS (August 2015) and the need to optimise the use of scarce urban land, it is proposed to base a search for sites on 400sqm per pitch. For a site of 6 pitches this equates to 2,400sqm (0.24ha) or greater.
- 5.10 Location of site. There are no known particular locational needs for gypsy and travellers who may wish to live on a site in Lewisham and given the difficulties in identifying a site, it is not proposed that any geographical preferences are identified (other than those in the selection criteria).
- 5.11 Whilst previous searches have sought to identify potential sites outside of the borough but close to its boundary, for practical and deliverability considerations, it is proposed to limit the search to land within the LB Lewisham.

Proposed Selection Criteria

- 5.12 Set out below is a discussion of the proposed criteria for selecting suitable site or sites.
- 5.13 Effective & efficient use of public assets. The LB Lewisham is a single authority with a wide range of different duties and discretionary powers. The Council has in place a Strategic Asset Management Plan (SAMP) 2015-2020 to ensure an integrated and overarching approach to land and property that it owns. This sets four interlinked objectives. These are:
- Compliance with regulation and responsiveness to risk;
 - Improving the quality of services delivered by the corporate asset function;
 - Reducing expenditure associated with the Council's assets; and
 - Increasing the level of income generated by the Council's assets.
- 5.14 The identification of a Council owned site or sites to provide gypsy and traveller pitches must reflect the objectives of the SAMP and the need for the effective and efficient use of publicly owned urban land during a period of unprecedented public sector cuts.
- 5.15 Core Strategy criteria. Core Strategy Policy 2 sets out the following 6 specific criteria for proposals for additional and alternative gypsy and traveller sites:
- They have reasonable access to local shops, services and community facilities in particular schools and health services.
 - They are safe and have reasonably convenient access to the road network.
 - They have provision for parking, turning, service and emergency vehicles.
 - Any business activities do not have unacceptable adverse impacts on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site.
 - They have a supply of essential services such as water, sewerage and drainage and waste disposal.
 - They are designed and landscaped to a high standard which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site.
- 5.16 It is proposed that all of these are incorporated in to the site selection criteria. However, in the absence of any site-specific proposal, some of these criteria need to be adjusted so that the

judgement to be made is whether the potential site is capable of meeting the criteria following detailed design and the establishment of appropriate management arrangements.

- 5.17 Healthy lifestyles. Policy H in the PPTS includes the need for LPAs when determining future planning applications to attach weight to (amongst other things) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children. The assumed average pitch size of 400sqm should allow for the incorporation of some landscaping and communal play space. However, it is proposed that the Core Strategy criteria are augmented by a criterion of promoting healthy lifestyles.
- 5.18 Local environmental quality. There is the need to augment the Core Strategy criteria with one that ensures an acceptable environment for residential use in terms of noise, air quality, flood risk and land contamination.
- 5.19 Spatial planning & development management considerations. There is the need to take account of planning policy considerations by reviewing policies in the adopted and emerging Local Plan, published London Plan and emerging Local and any Neighbourhood Plans. There is also the need to take account of key relevant planning guidance and the planning history of sites.
- 5.20 Deliverability. The PPTS defines sites that are ‘deliverable’ as follows: “Sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years.”
- 5.21 It is proposed that this definition of deliverability is used for site selection; otherwise the risk is that site selection is little more than a paper exercise with no realistic prospect of a site being delivered.

Application of proposed selection criteria

- 5.22 Table 5.1 below sets out the proposed criteria and how it is intended that they will be applied.

Table 5.1 Proposed Site Selection Criteria

| Site Selection Criteria | Explanation and application |
|--|--|
| 1. Effective and efficient use of public assets. | (a) Effective use of public assets – Judgement, taking account of existing service commitments and use, running costs, investment requirements, reasonable alternative use(s) for the provision of other services and the SAMP. (b) Efficient use of public assets– Judgement, taking |

| Site Selection Criteria | Explanation and application |
|---|--|
| | account of reasonable alternative use(s) and the Council's need to minimise opportunity costs and optimise capital receipts. |
| 2. Reasonable access to local shops, services and community facilities in particular schools and health services. | (a) Site within 800m of bus stop and/or station. (b) The following services within 1,500m: (i) Local shop; (ii) Primary School; and (iii) Health facility. |
| 3. Safe and reasonably convenient access to the road network. | (a) Safe vehicular access or capable of creating safe vehicular access for 15m long caravan to/off a public highway. (b) Access for emergency services. (c) Clearance height of 3.7m. |
| 4. Capable of satisfactory provision for parking, turning, service and emergency vehicles. | (a) Judgement (size and shape of site). (b) Infrequent access needed for 15m long caravan. |
| 5. Mixed residential and business use opportunities. | (a) Mixed-use residential and business use acceptable in principle (b) Any likely adverse impacts are acceptable (assuming appropriate licensing and planning conditions manage activities that could be carried out). |
| 6. Supply of essential services such as water, sewerage and drainage and waste disposal. | Assume all sites have access to all essential services or are capable of being connected (NB cost of doing so may vary and affect deliverability). N.B. All sites to be given a score of 'Average' for this criterion. |
| 7. Scope for healthy lifestyles and integration. | (a) Opportunities for healthy lifestyles such as adequate landscaping & play areas - Judgement (size and shape of site). (b) High standard design and landscaped which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site - Judgement (size and shape of site). |
| 8. Local environmental quality | (a) Contamination – Free from significant contamination or able to be cleaned up (consult LBL Environmental Health) ((NB cost of doing so may vary and affect deliverability). (b) Noise – Acceptable internal noise environment (consult LBL Environmental Health) (c) Air quality – Acceptable air quality (consult LBL Environmental Health) (d) Flooding – Reasonable prospect of sequential test and exceptions tests being met(See below) |
| 9. Spatial planning & development management considerations. | (a) Key relevant site specific development plan policies – both for the site itself and adjoining land (b) Key relevant general policies (c) Key relevant policies in emerging Local Plan and any emerging Neighbourhood Plan |

| Site Selection Criteria | Explanation and application |
|--------------------------------|---|
| | (d) Key relevant planning guidance (e) Planning history – identification of any key relevant planning history. (f) Summary – overall conclusion, taking account of the above. |
| 10. Deliverability. | Taking account of all of the previous criteria, sites should be: (a) Available now; (b) Offer a suitable location for development; and (c) Be achievable with a realistic prospect that development will be delivered on the site within five years. |

6 Timetable for preparation of the Local Plan

- 6.1. It is hoped that a GTLP will be adopted by January 2018. Before submitting a Plan to the Government for examination, it is proposed that there is one round of public consultation on a preferred site or sites. The expected timing is set out in Table 6.1 below.

Table 6.1 Proposed Timetable

| Stage | Expected timing |
|--|---|
| Consultation on scope, search parameters and selection criteria | This consultation – February/March 2016 |
| Consultation on scope of Sustainability Appraisal | February/March 2016 |
| Consultation on a preferred site or sites | September/October 2016 |
| Submission to the Government | April 2017 |
| Examination | August 2017 |
| Adoption | January 2018 |