




Copy for public consultation
August 2016

Gypsy and Traveller Site(s) Local Plan

Potential Sites:

Regulation 18 (Stage 2) Consultation Report



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How do I comment?

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

This consultation runs for X 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/LDF/Pages/Gypsy-and-Traveller-local-plan.aspx

Copies of the document can be viewed on:

- the Council's website
www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Gypsy-and-Traveller-local-plan.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.

1. Introduction

The Gypsy and Traveller Site(s) Local Plan

1.1. The Housing and Planning Act (2016) includes a duty (under Section 8 of the 1985 Housing Act) for local authorities to consider the needs of “people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.”

1.2. The Gypsy and Traveller Site(s) Local Plan (GTSLP) will form part of Lewisham’s development plan and will identify and designate land in the borough to accommodate the identified need for gypsy and travellers, as defined in the National Planning Policy for Traveller Sites (August 2015).

1.3. Unless otherwise specified, “the Council” means the Council acting in its capacity as the Local Planning Authority.

Background

1.4. Following the closure in 2009 of a former site in Thurston Road, next to Lewisham Station, Lewisham does not have any existing sites for the gypsy and traveller community.

1.5. The Council did grant planning permission in 2008 for five pitches on a site in Church Grove, Ladywell. However, this permission was not acted upon, the planning permission has lapsed and this site is currently being developed for ‘bricks and mortar’ housing.

1.6. The Council adopted its Core Strategy in June 2011. Core Strategy Policy 2 identified criteria for selecting sites and envisaged that site(s) would be identified through a Sites Allocation DPD. However, it did not prove possible to include a site or sites in the Council’s Site Allocations Local Plan (SALP) when this was developed and adopted in June 2013. At the Examination in to the SALP, the Council confirmed its intention to bring forward a separate GTSLP by May 2014.

1.7. The Council began preparing a GTSLP in March 2013. However, other priorities meant that things did not progress as planned and preparation on the Local Plan halted.

1.8. The Council commissioned a Gypsy and Traveller Accommodation Assessment (published in June 2015) and began preparing a GTSLP again in January 2016. The 2015 Accommodation Assessment was updated in August 2016.

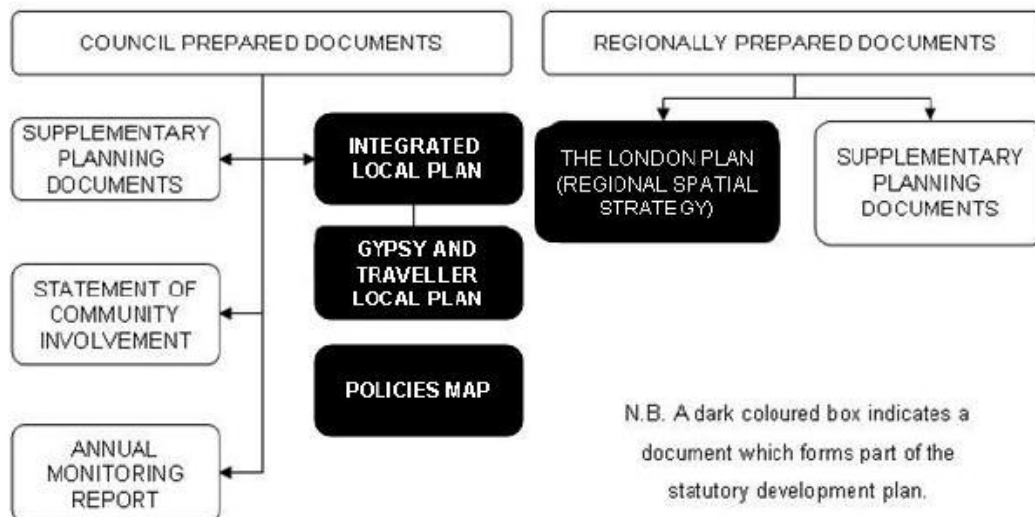
1.9. In parallel with developing a GTSLP, the Council (as Housing Authority) is developing a Gypsy and Traveller Pitch Allocation Scheme to, amongst other things, establish a fair, transparent and equitable system for the allocation of pitches on a Council managed site(s). This is to be the subject of separate consultation.

2. How the GTSLP will fit in with Lewisham’s planning framework

2.1. Lewisham’s existing planning framework comprises the adopted Core Strategy, Site Allocations Local Plan, Lewisham Town Centre Local Plan (February 2014) and Development Management Local Plan (November 2014) and supporting Supplementary Planning Documents.

2.2. 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 preparation of an integrated plan is a significant piece of work and has fallen behind schedule. Given the pressing need to provide traveller accommodation, the Council is continuing to develop a standalone GTSLP that will sit alongside the integrated Local Plan. The proposed Lewisham planning frameworks are summarised in Figure 1.

Figure 1: Proposed Lewisham planning framework



3. How the GTSLP has been prepared

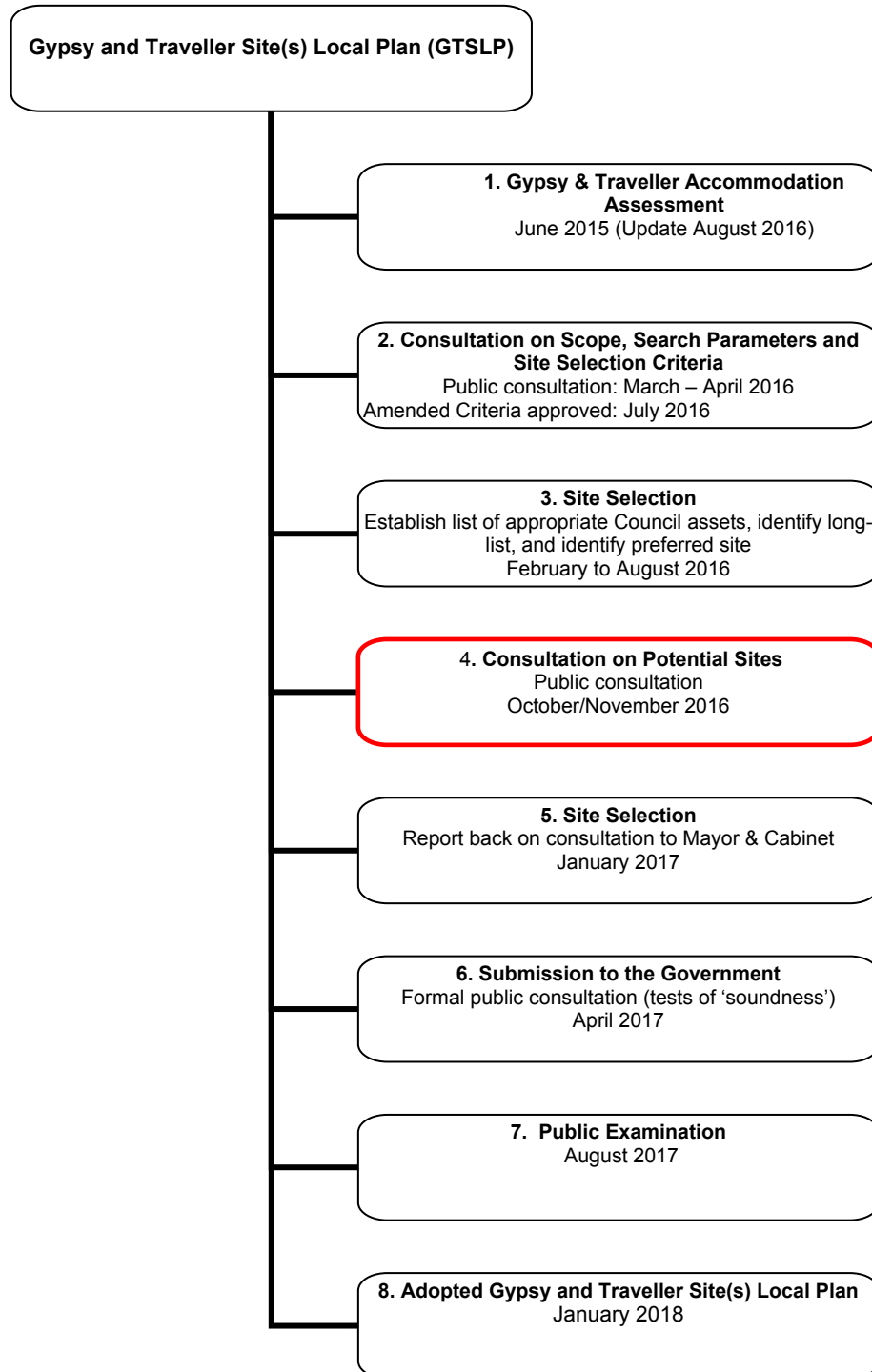
Regulations

3.1. The process for preparing Local Plans, including the GTSLP, is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.

Overall Process

3.2. The key stages in the preparation of the Plan are summarised in Figure 2 below. We are currently at Stage 4.

Figure 2: Key stages in preparing a GTSLP



Founding principles

3.3. The Plan has been founded on the following:

National and local policies, including:

- The National Planning Policy Framework (2012);
- The Government's Planning Policy for Traveller Sites (2015);
- National Planning Practice Guidance;
- The London Plan (2015);
- Lewisham's Core Strategy; and
- Other key relevant plans, policies and strategies.

Evidence base:

- Lewisham Gypsy and Traveller Needs Assessment (June 2015) as updated (July 2016).
- Other key relevant evidence.

Findings of the integrated appraisal:

- Sustainability Appraisal of the objectives, strategy and preferred site allocations to highlight potential conflicts or areas where there could be improvements and to ensure that the Plan accords with the principles of sustainable development.
- Equalities Analysis Assessment (EqAA) - an appraisal to identify equalities impacts and implications of emerging policy options.

Involvement of key stakeholders:

- Consultation on Scope, Search Parameters and Site Selection Criteria and Sustainability Appraisal Scoping Report;
- Consultation with officers across the Council, Lewisham Clinical Commissioning Group and the Metropolitan Police; and
- Co-operation with other public bodies.

National and local policies

National policy and guidance

3.4. The National Planning Policy Framework (NPPF) (March 2012) sets out the Government's planning policies for England. At the heart of the NPPF is a presumption in favour of sustainable development, which for plan-making means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area; and
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless (i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits; or (ii) specific NPPF policies indicate development should be restricted.

3.5 The NPPF is augmented by the National Planning Policy for Traveller Sites (PPTS) (August 2015). This sets out the Government's overarching aim as being 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.

London Plan

3.6. The consolidated London Plan was published in March 2015. 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 are identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.

Lewisham Core Strategy

3.7. The Core Strategy was adopted in June 2011. Core Strategy Policy 2 (Gypsies and travellers) is set out in full below.

1. The Council will continue to assess and provide for the identified needs of gypsies and travellers in appropriate locations. The Council is in the process of identifying a suitable site to meet the immediate need arising from the redevelopment of the Thurston Road site, which forms part of the approved Lewisham Gateway development. A site will be identified through the Site Allocations DPD.

2. Proposals for additional and alternative gypsy and traveller sites will be assessed having regard to the following criteria:

- (a) They have reasonable access to local shops, services and community facilities in particular schools and health services.*
- (b) They are safe and have reasonably convenient access to the road network.*
- (c) They have provision for parking, turning, service and emergency vehicles.*
- (d) 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.*
- (e) They have a supply of essential services such as water, sewerage and drainage and waste disposal.*
- (f) 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*

Other key relevant strategies/plans

3.8 The key relevant strategies/plans that have informed the preparation of the GTSLP include:

- Lewisham Sustainable Community Strategy 2008-2020;
- LB Lewisham's Strategic Asset Management Plan (SAMP) 2015-2020; and
- Lewisham River Corridor Improvement Plan 2015.

Evidence base

Gypsy and Traveller Accommodation Assessment

3.9. The Planning Policy for Travellers Sites makes clear that in producing their Local Plans, local planning authorities should, amongst other things:

- Identify and update annually, a supply of specific 'deliverable' sites sufficient to provide 5 years' worth of sites against their locally set targets; and
- Identify a supply of specific, 'developable' sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.

3.10. The Accommodation Assessment (as updated in August 2016) found the need of the households in Lewisham that meet the new definition are for an additional 6 pitches. This is made up of three existing adult households and accounting for three new households, usually formed by adult children setting up their own households.

Figure 3: Additional need for 'travelling' households by 5 year periods

Years	0-5	6-10	11-15	
	2016-21	2021-26	2026-31	Total
Lewisham Travelling	3	2	1	6

Other key relevant evidence:

3.11. The other key relevant evidence that has informed the preparation of the Plan includes:

- Lewisham Infrastructure Delivery Plan (2010) – under review with an IDP Framework Document being prepared in October 2015;
- Strategic Flood Risk Assessment Update 2015; and
- London Gypsy & Traveller Sites Working Paper on Net Density and Gypsy and Traveller Sites (July 2009).

Findings of the integrated appraisal

3.12. The provision of gypsy and traveller pitches at New Cross Social Club, and the adjoining land, could have a detrimental effect on health,

social inclusion and accessibility to community infrastructure through the loss of a social club and a multi-use games area. The provision of gypsy and traveller pitches at Pool Court could have a negative effect on landscape, biodiversity, flora and fauna through the loss of open space.

Involvement of key stakeholders

Consultation on Scope, Search Parameters and Site Selection Criteria

3.13. Consultation on the intention to prepare a Local Plan, its proposed scope and proposed Search Parameters and Site Selection Criteria (in accordance with Regulation 18) was undertaken in March and April 2016. Consultation on a Sustainability Appraisal Scoping report took place at the same time.

3.14. Consultation was in accordance with the minimum requirements of the relevant Regulations and the Council's adopted Statement of Community Involvement and included:

- Public display of documents;
- Documents published on the Council website and Consultation Portal;
- Press Notice;
- Mail out to prescribed and non-statutory bodies;
- Liaison with neighbouring boroughs; and
- Meetings with the Lewisham Gypsy and Traveller Forum and London Gypsy and Traveller Unit.

3.15. Following consultation, in July 2016 the Council's Mayor and Cabinet approved the final Search Parameters and Site Selection Criteria. Comments received on the Sustainability Appraisal Scoping Report have also been taken in to account in developing the appraisal.

Assessment of potential sites

3.16. Officers across the Council (including School Places, Environmental Protection, Public Health and Housing), Lewisham Clinical Commissioning Group (CCG) and the Metropolitan Police were consulted on a list of potential sites. The Council also commissioned studies to assess the suitability of these sites in terms of vehicular access and movement and, where necessary, flood risk.

Duty to Co-operate

3.17. 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 PPTS encourages LPAs to consider production of joint development plans that set targets on a cross-

authority basis, to provide more flexibility in identifying sites, particularly if they have special or strict planning constraints across its area.

3.18. The South East London Planning Authorities (Lewisham, Bexley, Bromley, Greenwich and Southwark) hold quarterly meetings to facilitate joint working on strategic matters. The group have considered the provision of sites for Gypsy and Traveller accommodation across the subregion and have considered a joint approach to address this strategic issue. The boroughs have been progressing traveller pitch provision through different development plan documents which are at different stages in plan preparation, and have therefore not prepared a joint, subregional document to assess need or allocate site(s) for gypsy and traveller accommodation.

3.19 The boroughs have previously considered their joint approach to bricks and mortar housing through the joint production of a South East London Strategic Housing Market Assessment (2014) (SHMA) which looks at housing need across the subregion and provides an evidence base to inform plan making. This is to ensure that housing planning policies are consistent across the boroughs and are aligned towards the same objectives. This subregional work is ongoing and arrangements are in place to consider all housing issues at future South East London Planning Authorities Duty to Cooperate meetings.

4. Site selection process

4.1. The Council originally identified a seven-step site selection process, including 'long-list', 'short-list' and 'Preferred Site or Sites' steps. However, given the relatively small number of potential sites that emerged from Stage 3, the 'long-list' and 'short-list' steps were combined in to one. This resulted in the following six-step approach:

Step	Task
Step 1	<i>Consult on proposed scope of Plan, Search Parameters, Site Selection Criteria & Sustainability Appraisal Scoping Report.</i> This was undertaken in March and April 2016.
Step 2	<i>Establish a list of appropriate Council assets.</i> Officers identified a list of all Council assets (land and buildings) of 0.24ha in size and above based on 6 pitches with an average of 400sqm from Council ownership data by reviewing the Council's asset registers.
Step 3	<i>Identify a long-list of potential sites.</i> Officers applied Site Selection Criterion 1 (Effective and efficient use of public assets) and this resulted in 5 potential Council-owned sites being identified. A private landowner also put its site forward for consideration during Stage 1 and this was included on the following long-list of 6 sites:

Step	Task
	<p>A - Land on Westbourne Drive SE23; B - Land off Turnham Road, SE4 ; C - New Cross Social Club & adjoining land, Hornshay Street, SE15; D - Land at R/O 46-116 Baizdon Road SE3; E - Land at Pool Court, SE6; and F - Land at St Mildred's Road, Hither Green, SE12.</p>
Step 4	<p><i>Identify a preferred site or sites.</i> Officers apply Site Selection Criteria 2 to 10 to the long-list of sites resulting in the identification of the proposed preferred sites.</p> <p>Officers drew on the results of engagement with officers across the Council and the Clinical Commissioning Group and the Metropolitan Police, together with the findings of relevant studies (as discussed in Section 3.16 above) when applying Criteria 2 to 10 to the long-list of sites and assessing the appropriateness of potential sites.</p> <p>A site selection matrix was established so that each criterion for each site could be given a qualitative score (1 – Excellent, 2- Good, 3 – Average, 4 – Poor or 5 - Very poor). This in turn allowed for the six long-listed sites to be compared and the merits and shortcomings of each site to be considered in order that the most appropriate site or sites is allocated in the Plan.</p>
Step 5	<p><i>Publish a draft Local Plan that identifies a preferred site or sites.</i> Undertake appropriate consultation on the potential site or sites. This is the stage that the Plan is currently at.</p>
Step 6	<p><i>Select a site.</i> Take full account of the results of consultation and the integrated appraisal and choose a site for inclusion in a submission version of the GTSLP.</p> <p>The submission version of the GTSLP (Regulation 22) will be accompanied by supporting documents, including a Statement of Representations that sets out details of who was consulted when preparing the Plan and how the main issues raised have been addressed. This provides a formal opportunity for the local community and other interests to comment on the ‘soundness’ of the proposed site allocation(s).</p>

Site-selection background paper

4.2. The site selection assessment is set out in detail in a Site-selection Background Paper that is published alongside this report.

4.3. Having considered the results of the assessment process as a whole, two alternative sites have been considered suitable for meeting the identified need. These are:

- Site C - New Cross Social Club & adjoining land; and
- Site E - Land at Pool Court.

5. Site Allocations

Introduction

5.1. Government guidance is that where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development (addressing the ‘what, where, when and how’ questions).

What

5.2. The two preferred sites are alternative ways of providing a gypsy and traveller site. The Council will take full account of comments made in response to this consultation, the findings of the integrated appraisal and all other material considerations before deciding which of the two sites should be allocated for permanent residential pitches.

5.3. Both preferred sites are capable of accommodating more than the 6 pitches that are estimated to be needed in Lewisham up to 2031. In common with ‘bricks and mortar’ housing, the Council is keen to optimise the actual number of pitches that are provided on a chosen site. In the absence of detailed design, it is not possible at this stage to know what this would be. However, taking account of site characteristics and a site-specific average pitch size that reflects these, an indicative capacity is identified for both preferred sites.

5.4. A chosen site is likely to be designed and developed to accommodate pitches of varying sizes to meet the needs of those households that have the greatest housing need and are top of the Council’s waiting list for pitches. Pitches are likely to include a hardstanding area for a static caravan, touring caravan and parking space. Pitches are also expected to include a single-storey amenity building and some landscaping/open space. It is hoped that there would also be an area of communal play/open meeting space on the site.

Where

5.5. The two alternative preferred sites are identified below.

When

5.6. The Needs Assessment (as updated in August 2016) found that the minimum need for 6 pitches arises from people currently living in bricks and mortar homes, teenage children and household formation – with 3 pitches needed immediately (2016-21), 2 further pitches needed between 2021 and 2026 and 1 more needed between 2026 and 2031.

5.7. However, for practical and financial reasons, the Council expects to deliver all of the optimum number of pitches on a chosen site in one go and will allocate them according to its emerging Traveller Pitch Allocation Scheme.

How

5.8. The allocation of a site for use as a gypsy and traveller site in a GTSLP would provide a presumption in favour of the principle of this use and effectively safeguard the land for this purpose. However, full planning permission for the development and detailed design of the site would be required in the normal way.

5.9. The law requires that, to the extent that development plan policies are material to an application, the decision on planning applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Core Strategy Policy 2 (see Section 3.7) sets out criteria for assessing proposals for gypsy and traveller sites and these will form the basis for determining future planning applications. There are also a number of relevant policies in the Council's Development Management Local Plan (November 2014).

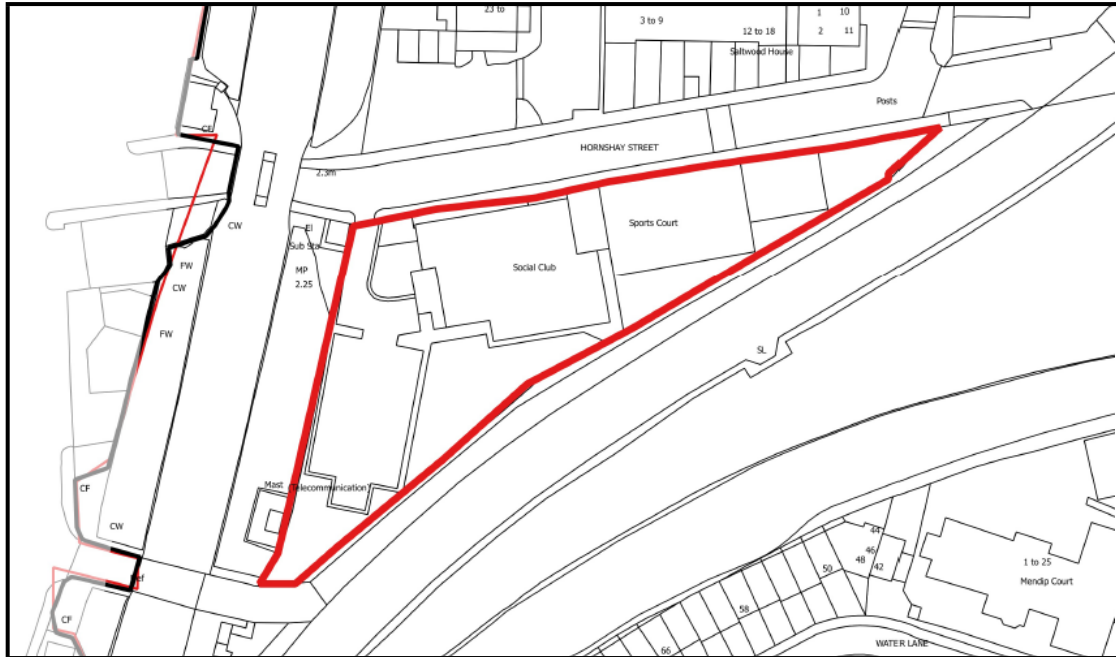
5.10. The Council would welcome pre-application discussions over the design and management of a site so that it can help shape proposals to ensure that they meet the needs of the gypsy and traveller community, represent high quality design, safeguard existing residential amenity and respect the environment. The Council will also want to ensure any permission is subject to appropriate planning conditions and that, together with necessary environmental permits and licensing arrangements, these effectively manage the use and operation of the site

5.11. The Council is expected to be the applicant and as such, any planning application will need to be dealt with in accordance with Regulation 3 of the Town and Country Planning General Regulations 1992 – which, in summary, means that no officer or councillor that has a role in asset management can have any role in assessing or determining the planning application.

5.12. The Council is expected to be responsible for managing a chosen site, either directly or indirectly via a third party, and appropriate management arrangements will be put in place in due course.

Potential Site C

5.13. Site Name/Address. New Cross Social Club and adjoining land.



5.14. Size. 0.31

5.15. Ownership: LB Lewisham

5.16. Current Use. Licensed bar and hall (also used for community events) and associated car parking and Multi Use Games Area (MUGA).

5.17. Site Characteristics. The part one/part two-storey building and car parking area and the fenced MUGA are on the south side of Hornshay Street, which connects Ilderton Road with the Lovelinch Close Estate. The site is relatively flat.

5.18. On the north side of the street, behind a brick wall, are the gardens of homes in Saltwood House, a four-storey block of flats, and a car parking area that serves this building and Upnall House. To the east, through an underpass, is Bridgehouse Meadows. The southern boundary is formed by a brick retaining wall and raised railway which forms part of the London Overground network and the western boundary is formed by a railway embankment.

5.19. Proposed Use and indicative capacity. Based on a site-specific average pitch size of 400sqm - permanent traveller site for at least 6 residential pitches.

5.20. Site-specific Development Guidelines:

(a) One or two vehicular access/exit points would be acceptable along the length of the Hornshay Street frontage (providing, if there are two, that there is a safe distance between them).

(b) The Hornshay Street boundary treatment and access should be designed to provide a safe and welcoming entrance to the site, protect the privacy of residents living on the site and provide an attractive street frontage (including some visual interaction between the street and the site).

(c) Trees should be planted along on site close to its boundary with Hornshay Street in order to provide visual interest and shade for future residents and improve the street scene.

(d) Any on-site external lighting should be carefully designed and specified so as not to cause disturbance to nearby residents.

(e) Mitigation for the loss of the existing MUGA by way of either improvements to an existing facility or facilities or a replacement facility.

Potential Site E

5.21. Site Name/Address. Land at Pool Court.



5.22. Size. 0.78ha

5.23. Ownership: LB Lewisham and Network Rail

5.24. Current Use. Vacant open land and scaffolding yard.

5.25. Site Characteristics. The site comprises two parcels of land either side of Pool Court road.

5.26. The western part of the site comprises vacant open land to the north of existing housing/car parking area. The land is currently fenced off and inaccessible and forms part of the designated Site of Importance for Nature Conservation (SINC), called Pool River Linear Park. The western boundary is formed of a railway embankment and the northern boundary is formed by the Pool River and other open land.

5.27. The eastern part of the site comprises an operational scaffolding yard that is accessed from Fordmill Road and open land, with additional open land to the north – leading up to the River. The eastern boundary is formed by a railway embankment, which also forms part of the Site of Importance for Nature Conservation.

5.28. Proposed Use and indicative capacity. Based on a site-specific average pitch size of 750sqm - permanent traveller site for between 6 and 10 residential pitches.

5.29. Site-specific Development Guidelines.

(a) The site should be accessed and exited solely from the Fordmill Road frontage.

(b) The boundary treatment and access/exit along the Fordmill Road should be designed to provide a safe and welcoming entrance to the site, protect the privacy of residents living on the site and provide an attractive street frontage (including some visual interaction between the street and the site).

(c) The boundary treatment to the Pool Court road frontage and car parking area should safeguard the existing trees that are just outside of the site and safeguard the amenity of existing residents.

(d) All works carried out within 8m of the Pool River will require an environmental permit from the Environment Agency. Earth works, landscaping and other development in this part of the site should be designed and managed to enhance this part of the River and take account of guidance in the River Corridor Improvement Plan SPD (September 2015).

(e) As many existing trees and as much mature vegetation as possible should be retained and incorporated in to the landscape design and additional tree planting should be incorporated where possible along the boundaries with Pool Court.

(c) Any on-site external lighting should be carefully designed and specified so as not to cause disturbance to nearby residents or harm the biodiversity value of the site or adjoining land.

6. General Design Guidelines and Planning Application Requirements

General Design Guidelines

6.1. Whilst formally withdrawn in October 2015 following the publication of the National Planning Policy for Travellers, there is a lot of good general design guidance in the Department of Communities and Local Government's 'Good Practice Guide' (published in 2008). In the absence of any replacement guidance, reference should be made to this in the detailed design of a site and its individual pitches.

6.2. Applicants are encouraged to engage fully with the gypsy and traveller community, seek expert advice and draw on good practice from across London to ensure that a site:

- Meets the needs of the gypsy and traveller community;
- Is of a high quality design;
- Safeguards existing residential amenity; and
- Respects the environment.

Planning Application Requirements

6.3. A full planning application should include the following:

- Existing and proposed site levels;
- General site arrangement plan;
- Hard and soft landscaping drawings (including full details of road ways, paths, hardstanding areas, tree and other soft landscaping, Sustainable Urban Drainage features and boundary treatments, including between pitches);
- Floor plans, sections and elevations of permanent buildings;
- Full details of refuse collection and postal delivery arrangements;
- Full details of treatment of external boundaries;
- Full details of all external lighting;
- Flood Risk Assessment and Drainage;
- Transport Statement;
- Design and Access Statement; and
- Site Management Plan.

7. Infrastructure

7.1. The Council published an Infrastructure Delivery Plan (IDP) in August 2010. It has prepared an IDP Framework Document in (October 2015) and this is being used to prepare a revised IDP to support the delivery of the emerging Integrated Local Plan and the GTSLP.

7.2. The relatively small number of households that are expected to live on a chosen site are unlikely to give rise to the need for additional infrastructure.

7.3. Nevertheless, members of the gypsy and traveller community face particular challenges in accessing health, education and other services. The Council's School Places Manager and Lewisham Clinical Commissioning Group will continue to be involved once a site is selected and delivered, to help ensure that necessary adjustments to local service provision are made to cater for the particular needs of people living on a site.

8. Delivery and monitoring

8.1. The delivery of an allocated site is addressed in Section 5 above, under the 'How' heading. In the event that an allocated site should fail to deliver the number of pitches needed, Core Strategy Policy 2 (Gypsy and travellers) makes provision for any unmet need to be met through the planning application process only, stating as it does that:

"2. Proposals for additional and alternative gypsy and traveller sites will be assessed having regard to the following criteria" (Listed in Section 3.7 above):

8.2. The monitoring framework in the Core Strategy sets out indicators and targets for each of its strategic objectives. For Objectives 02 (Housing provision and distribution) and 03 (Local housing need), the following are identified in relation to Core Strategy Policy 2 (Gypsies and travellers):

- Indicators – Net additional pitches (gypsy and travellers); and
- Target – Net additional pitches.

8.3. The Council will be monitoring the delivery of pitches using the above indicator and target, or any relevant replacement ones that may be identified as part of preparing a unified Local Plan, and will use its Annual Monitoring Report (AMR) to record progress.

9. Changes to existing allocations

9.1. If Site E is chosen and allocated as a permanent gypsy and traveller site, the Council will need to de-allocate those parts of the Site of Importance for Nature Conservation called Pool River Linear Park.

Appendix 1: Approved Search Parameters and Site Selection Criteria

Search Parameters

The approved search parameters are as follows:

- Council-owned housing land.
- Council-owned non-housing land.
- Private and other publicly owned land – focus on Council owned land, other than, possibly, adjacent land in other ownerships that may be necessary to develop a Council asset.
- For practical considerations of site management and economic considerations the Council consider the need for 6 pitches should be met on a single site.
- Type of site - full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and any combination.
- Size of site - base a search for sites on 400sqm per pitch (average size).
- Location of site – whole borough.

Site Selection Criteria

The final Site Selection Criteria are as follows:

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 Strategic Asset Management Plan (SAMP). (b) Efficient use of public assets– Judgement, taking 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 environmental permitting regulations, appropriate licensing and planning conditions manage activities that could be carried out).
6. Supply of essential	Assume all sites have access to all essential services or are capable

Site Selection Criteria	Explanation and application
services such as water, sewerage and drainage and waste disposal.	of being connected (NB cost of doing so may vary and affect deliverability).
7. Scope for healthy lifestyles and integration.	<ul style="list-style-type: none"> (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	<ul style="list-style-type: none"> (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
9. Spatial planning & development management considerations.	<ul style="list-style-type: none"> (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 (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.	<p>Taking account of all of the previous criteria, sites should be:</p> <ul style="list-style-type: none"> (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.