



Gypsy and Traveller Site(s) Local Plan

Intention to prepare a Local Plan:
Regulation 18 Consultation Report

Consultation Statement

Town and Country Planning (Local Planning) (England) Regulations 2012

August 2016

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1.0 Introduction

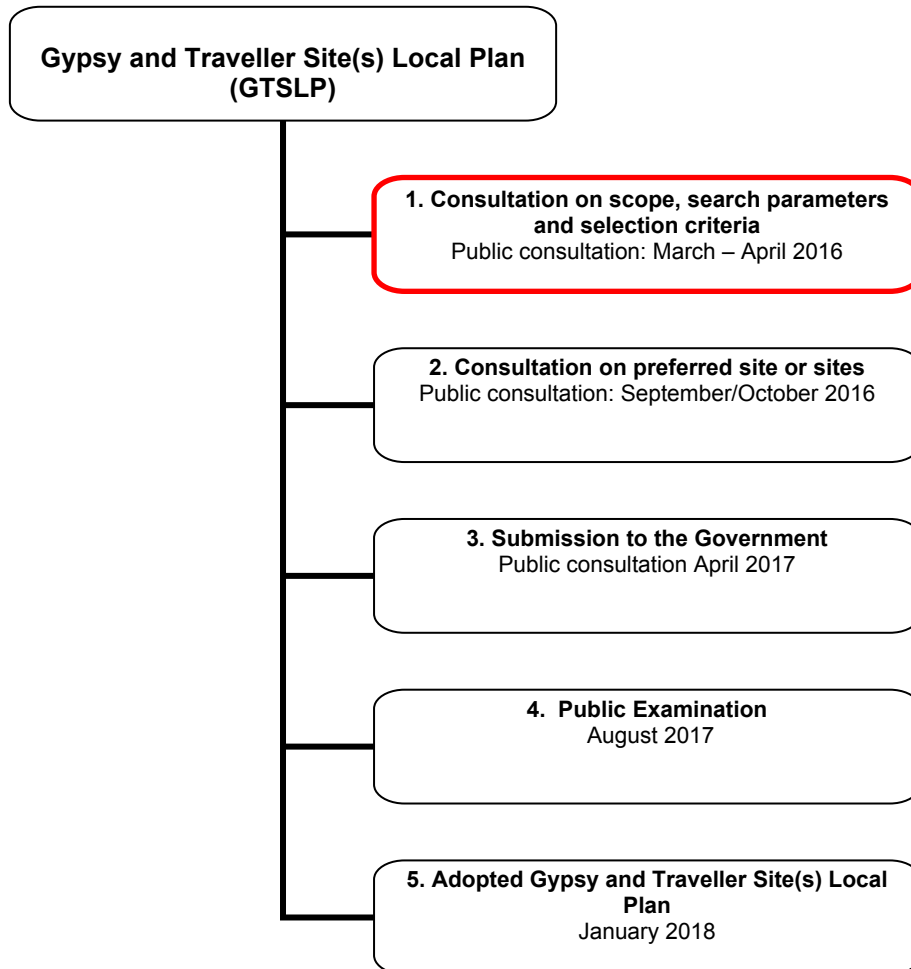
- 1.1 The Gypsy and Traveller Site(s) Local Plan (GTSLP) is being prepared as a single-issue Local Plan in order to allocate a site or sites to meet the identified local accommodation needs of Gypsy and Traveller communities in the borough. The legislative requirement for local authorities to assess the need for Gypsy and Traveller accommodation in their areas was outlined in the [Consultation Report](#). The GTSLP will set out how the Council will meet the needs of Gypsy and Traveller and Travelling Showpeople accommodation in Lewisham over the next 15 years.
- 1.2 The process for preparing statutory Local Plans is stipulated in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 establishes the consultation requirements for the preparation of a local plan and the need for local planning authorities to take into account the representations received. Lewisham's Statement of Community Involvement (adopted 2006) (SCI) defines the Council's standards in relation to involving the community in the preparation of all local development documents. The purpose of the SCI is to ensure that all sections of the community and other interested parties have a reasonable opportunity to get involved from the earliest stage of policy proposals.
- 1.3 With respect to the Regulation 18 Consultation Report and the accompanying Sustainability Appraisal Scoping Report this statement sets out the following:
- **Section 2:** the process of consultation in relation to the overall preparation of the plan
 - **Section 3:** which bodies and persons were invited to make representations under Regulation 18 (2012)
 - **Section 4:** how those bodies and persons were invited to make such representations
 - **Section 5:** the channels available for respondents to reply
 - **Section 6:** the process for consultation on the SA Scoping report
 - **Section 7:** a summary of the main issues raised by written representations on the Regulation 18 Consultation Report and the Council response to the issues raised.
 - **Section 8:** a summary of the main issues raised by questionnaire responses and the Council response to the issues raised.
 - **Section 9:** A summary of the issues raised in a meeting with Gypsy and Traveller Forum (24.02.2016) and the Council response to the issues raised.
 - **Section 10:** A summary of the issues raised in meeting with London Gypsy and Traveller Forum (LGTU) (14.04.2016) the Council response to the issues raised.

- **Section 11:** a summary of the main issues raised by the representations in response to the SA Scoping report and the Council's response to the issues raised.
- **Section 12:** the conclusions and a statement of compliance with the requirements of Regulation 18

2.0 Consultation Process

2.1 Regulation 18 represents the first (statutory) stage in the process of preparing the GTSLP.

Figure 1: Key stages in the preparation of the GTSLP



2.2 Stage One is the initial “scoping” phase of the plan preparation process and, in accordance with Regulation 18 (1), Lewisham Council asked key stakeholders and interested people about the intention to produce the Gypsy and Traveller Site(s) Local Plan and invited representations about they thought it should contain.

2.3 Specifically, representations were sought regarding:

- the scope of the plan (the preparation of the GTSLP as a single-issue Local Plan to allocate a site or sites to meet the identified local accommodation needs of Gypsy and Traveller communities in the borough)
- the proposed search parameters and selection criteria to be used to identify a site or sites
- the proposed timetable for preparing the plan

- 2.4 The official public consultation on the GTSLP – Stage One: Scope, Search Parameters and Selection Criteria Report, and Sustainability Scoping Report was originally advertised from 3rd March 2016 to 14 April 2016 which met the minimum six week time period set out in the Statement of Community Involvement (SCI) and the Planning Regulations 2012. The consultation period was subsequently extended for an additional week, to 22 April 2016. The methods of consultation used during this time are set out in section 4 of this report.

3.0 Consultees

- 3.1 The National Planning Policy Framework (NPPF) states that a wide section of the community should be engaged in the preparation of Local Plans so that, as far as possible, they reflect a set of agreed priorities for the sustainable development of the area (para. 155).
- 3.2 Regulation 18 (2) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local planning authorities to consult any 'specific consultation bodies' such as national agencies and neighbouring planning authorities that they consider may have an interest in the subject of a proposed local plan. They are required to do the same for general consultation bodies, such as organizations that represent the interests of different ethnic groups, and finally, with respect to residents or other persons conducting business with the area from whom representations would also be pertinent.
- 3.3 The GTSLP will show how the Council will meet Gypsy and Traveller and Travelling Showpeople accommodation needs in Lewisham over the next 15 years and will therefore have an impact on residents across the borough. London Borough of Lewisham carried out early and meaning engagement and collaboration with neighbourhoods, local organisations and businesses, in line with paragraph 155 of the NPPF. Specifically, it was identified that the following stakeholders should be invited to make representations on the GTSLP: Stage One: Scope, Search Parameters and Selection Criteria Report:
- Existing residents and businesses within the borough
 - Representatives for and members of the Gypsy and Traveller and Travelling Showpeople community with the borough
 - Local service providers
 - Consultees listed on the planning policy database
 - Landowners
- 3.4 The contact list was taken from the planning consultation database, which has been compiled over a number of years, and is continuously amended and updated. A list of the specific consultation bodies that were consulted as required by the Regulations is provided in Appendix 1. A list of all the types general consultation groups consulted is in Appendix 2.

4.0 Methods of Consultation

4.1 Regulation 35 (Part 9) of the Town and Country Planning (Local Planning) Regulations 2012 specifies the minimum requirements for ensuring the availability of local plan consultation documents.

4.2 In addition, Lewisham's Statement of Community Involvement outlines a range of possible mechanisms to involve and engage the Lewisham's diverse population. These consultation methods were adapted to meet the requirements and needs of the GTSP: Stage One: Scope, Search Parameters and Selection Criteria Report and are listed below.

Public Display of Documents

4.3 In compliance with Regulation 35 (1a) hard copies of the documents were displayed at all the Borough libraries and the AccessPoint, at Laurence House, Catford for the duration of the consultation period.

Publish on Council Website & Consultation Portal

4.4 In compliance with Regulation 35 (1b), the plans were put on the [Council website](#) and the [Consultation Portal](#) from the start of the consultation period.

Press Notices

4.5 The SCI identifies the use of a press notice as one of the consultation tools at the disposal of Lewisham Borough Council with the potential to reach a borough-wide audience. Thus, a press notice was published in the local newspaper, the South London Press, on the 1st March 2016 for the start of the consultation period.

Mail-out to prescribed and non-statutory bodies in the planning policy consultation database

4.6 The planning policy database contains consultee addresses and is updated regularly. Letter and e-mails were used to notify consultees about the GTSLP – Stage One: Scope, Search Parameters and Selection Criteria Consultation Report.

Liaison with Neighbouring Boroughs

4.7 Neighbouring Boroughs (Greenwich, Southwark, Bromley and Tower Hamlets) were sent a letter inviting them to contact the Planning Policy Team in relation to the consultation.

Questionnaire

4.8 A questionnaire was developed and tailored to obtain feedback on the proposed search parameters to be used to identify a site or sites, and the proposed selection criteria to assess alternative sites.

Meetings with key stakeholders

4.9 Given the subject of the GTSLP it was considered appropriate to meet directly with members and representatives of the Gypsy and Traveller and Travelling showpeople Community. To this end meetings were held with the Lewisham Gypsy and Traveller Forum (24.02.16) and the London Gypsy and Traveller Unit (12.04.16) to obtain their views and discuss the subject of the consultation in detail.

Copies of documents

- 4.10 In addition, interested parties were able to obtain hard copies of the report by contacting the Planning Policy Team. The team were also available to answer questions.

5.0 Methods of Response

Communication Channels

5.1 Respondents were able to comment and made representations via the following communication channels:

Online via: https://lewisham-consult.objective.co.uk/portal/planning_policy

Email at: planning.policy@lewisham.gov.uk

Post to: Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE6 4RU

Verbally Comments made by participants at meetings (see previous section) were taken down as notes.

6.0 Sustainability Appraisal Scoping Report Consultation

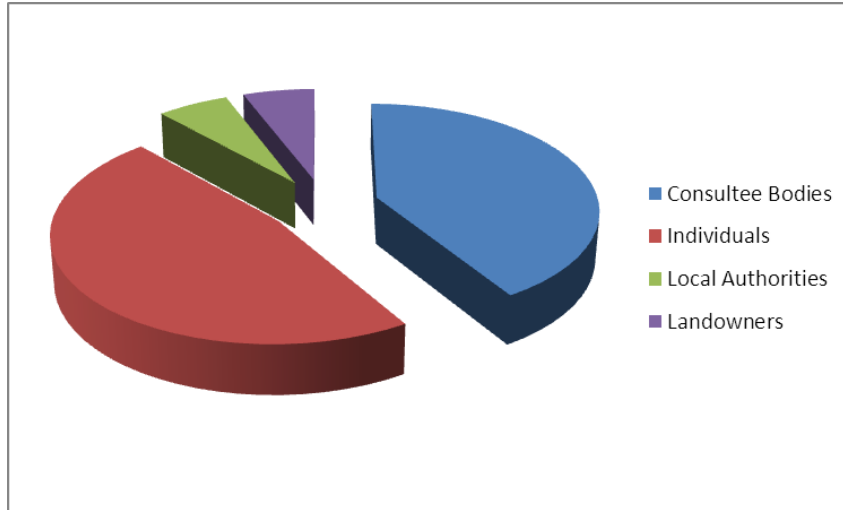
- 6.1 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a Sustainability Appraisal (SA) of each of the proposals in a Local Plan during its preparation. The SA involves identifying and evaluating a plan's impacts and assessing the social, environmental and economic effects to help ensure that the plan accords with sustainable development principles. Scoping forms the initial stage of the SA process and incorporates the collection of baseline data and information on other plans, policies and programmes that can influence the preparation of the Gypsy & Traveller Site(s) Local Plan. The data presented in the [Sustainability Appraisal Scoping Report](#) identified key sustainability issues, objectives and targets.
- 6.2 The Council consulted on the SA Scoping Report at the same time as consulting on the Regulation 18 Consultation Report. It was, likewise, published on the website and the consultation portal, and copies were made available at all the borough libraries and the AccessPoint at the Council offices.
- 6.3 On 8th March 2016 the Council sent the 'Sustainability Appraisal Scoping Report' to the following authorities with environmental responsibilities:
- Natural England
 - Historic England
 - Sport England
 - The Environment Agency
 - Greater London Authority

A copy of the covering letter sent to these bodies, dated 8th March 2016, is contained in Appendix 4.

7.0 Written Representations

7.1 The Council received a total of 17 written representations during the public consultation process. In the chart below the written representations are broken down by type of respondent. As can be seen the responses are divided equally between consultee bodies/Local authorities and individuals/landowners.

Figure 2: Breakdown of Consultation Responses by Type of Respondent



7.2 Full details of all comments received during the consultation can be obtained from the Planning Service and Appendix 6 contains a summary and response to each respondent. However, the main issues raised in the responses are summarised in the table below. Regulation 18 (3) requires Local planning authorities to take into account the representations made to them in response to local plan preparation and, after each distinct issue raised by through the written representations, the Council has given its response.

Table 1: Written Representations - Summary of Main Issues

Flood Risk
<p><u>Comments:</u> The Environment Agency (EA) reiterated the national policy requirements for sequential testing and, where required, the application of the exception test for sites in flood risk locations, as well as emphasizing the vulnerability to flooding of this particular use.</p> <p>The Agency also highlighted the need for the Sustainability Appraisal and the GTSLP to be informed by updated flood modelling for the area and higher allowances for the potential impacts of climate change - indicating greater future flood impact. The EA expressed the desire to discuss how these issues would inform the preparation of the GTSLP.</p> <p><u>Council Response:</u> The Council will liaise closely with the Environment Agency to ensure the most up-to-date data on flood risk is taken account of within the plan</p>

preparation.

River Corridors and Biodiversity

Comments: The Environment Agency recommended that the following additional site selection criteria be included:

Any business activities follow regulations/ good practice and do not have a negative impact on the quality of the river corridor or on the biodiversity value of any neighbouring sites which support protected or priority habitats or species.

Council Response: The Council will consider the inclusion of this in the policies for the site or sites.

Comments: The Environment Agency requested that the explanation and application of Table 5.1 Proposed Site Selection Criteria point 5 (Mixed residential and business use opportunities) be amended as highlighted in bold below:

*(b) Any likely adverse impacts are acceptable (assuming **environmental permitting regulations**, licensing and planning conditions manage activities that could be carried out).*

Council Response: The text will be amended as proposed.

Land Contamination

Comments: The Environment Agency noted the potential beneficial effects of the return to use of brownfield land in terms of improvements to land and water quality. However, they stressed that the condition of the land could restrict the use of SUDS and engender additional costs through the need to address contamination.

Council Response: The Council will take this into account.

Impact on Local Community Services and Infrastructure

Comments: There were a number of comments from local residents regarding the potential impact on the surrounding people and local services and infrastructure caused by the introduction of this land use in an area. One specific suggestion put forward by a number of residents (3) was for the inclusion of criterion that a new site should not be located within a three mile radius of any existing Gypsy and Traveller sites.

Council Response: In accordance with the Government's *Planning Policy for traveller sites* (para.4.k) the evaluation of a site would have due regard to the protection of local amenity and the local environment and 'protect local amenity and environment' (para.10.e).

Given the size of the borough and the difficulties involved in locating a site for Gypsy and Traveller use, it is not proposed to apply an exclusion zone. Such a restriction

would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site would be of a level that would significantly add to pressure on local services.

Integration with the existing communities in terms of the access of the site to services and community facilities, such as schools and health services, is set out in criterion 2 of the Proposed Site Selection Criteria and criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure. .

However, as stated in the Consultation Report, Lewisham will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies.

Impact on Social Deprivation

Comments: One response from a local authority highlighted the need to consider the possible impact of the location of a Gypsy and Traveller site in an area where there is an existing a high level of social deprivation. The response called into question the siting of a new Gypsy and Traveller settlement in an area where services are already under pressure and suggested that this issue be incorporated amongst the criteria for site selection.

Council Response: Given the difficulties in identifying a site, it is not proposed to apply additional geographical constraints to the process of site selection. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services. In addition, criterion 2 of the proposed site selection criteria will ensure any occupants of a proposed site or sites will have access to essential local services and community facilities. Criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure.

Accommodation Need

Comments: One respondent expressed their opposition to the provision of a Gypsy and Traveller site(s) due to the potential recipients currently already being adequately accommodated in permanent buildings in the form of houses and council flats.

Council Response: The Lewisham Gypsy and Traveller Accommodation Needs Assessment (GTANA) will be revised to take account of the new definition of “gypsies and travellers” set out in Annex 1 to the Government’s ‘Planning policy for traveller sites,’ and will consider whether Gypsies and Travellers have previously led a nomadic habit of life, the reasons for ceasing their nomadic habit of life, whether they intend to live a nomadic habit of life in the future, and if so, how soon, and in what circumstances.

Comments: The London Gypsy and Traveller Unit (LGTU) voiced their concern that a review of the Gypsy and Traveller Accommodation Needs Assessment might result in a

lower figure of accommodation need for two reasons. Firstly, due to difficulties in securing the same number of households for further interviews. Secondly, through the potential application of an incorrect interpretation of the planning definition of travellers which failed to take account of:

- the need to accommodate young Gypsy and Traveller families in the future
- the reasons why travellers have stopped travelling related to education, healthcare and access to employment opportunities, plus tenancy restrictions, as well as the lack of currently available site accommodation and limited possibilities to travel
- The diverse reasons for travelling, including cultural and traditional reasons such as visiting family, attending weddings and funerals, attending religious events and pilgrimages, and going to fairs.

Council Response: The Council notes these concerns.

Proposed Sites

Comments: A request, on behalf of the landowner, was made for land at Hither Green to the rear of St Mildred's Road and Rayford Avenue / Ronver Road. Oceanwave Estates Ltd. to be considered as a potential gypsy and traveller site.

Council Response: The Council has noted the information regarding this site and the agreed site selection criteria will be applied to assess its suitability.

Comments: One respondent suggested the Council consider locating a site on 'plot A Catford resi development by the station.'

Council Response: Planning permission was granted in 2014 for the redevelopment of the Catford Stadium site for 589 homes (DC/13/84895) and the scheme is currently being built-out. There is a current planning application (DC/15/94002) for the redevelopment of Plot A (to the north of the site, in between Catford and Catford Bridge Stations) for a part 18/part 19 residential tower.

Water Infrastructure

Comments: Extensive comments were provided by Thames Water regarding water supply, wastewater and sewerage infrastructure, including a recommendation for the content of a specific policy on these matters.

Council Response: Proposed Site Selection 6 satisfactorily deals with the supply of essential services (including water, sewerage and drainage). A detailed study may be necessary to support a planning application for a gypsy and traveller site.

Strategic Transport Infrastructure Plans

Comments: Transport for London stated that there was a need to have regard to the development of strategic infrastructure in the assessment of the location of sites for

Gypsy and Traveller accommodation and cited the example of the proposed Bakerloo line extension through to Lewisham.

Council Response: Criterion 9 of the Proposed Site Selection criteria satisfactorily addresses spatial planning and development management considerations. A reference to the constraints purposed the development of key strategic infrastructure *could* be included.

Application of Selection Criteria

Comments: The London Gypsy and Traveller Unit (LGTU) commented that the site selection criteria should not unduly hinder the selection of a site and that if a number of constraints were identified for the options resulting from the site search, the Council should demonstrate how these could be mitigated.

Council Response: The Council will take into account the potential for constraints to be mitigated in the development of a site for Gypsy and Traveller use.

Site Design

Comments:
The London Gypsy and Traveller Unit (LGTU) stated that the shape of the plot(s) and how the pitches can be accommodated on them needed to be evaluated in the assessment of the potential sites.

Council Response:
Criteria 4 and 7 of the Proposed Site Selection Criteria incorporate judgements about size and shape of potential sites with regards to for highways and parking issues (4) and as well as landscaping and play areas (7).

8.0 Questionnaire Response

- 8.1 The Council received 8 on-line questionnaire responses. The questionnaire comprised a series of 19 questions designed to obtain feedback on:
- proposed search parameters to be used to identify a site or sites
 - proposed selection criteria to assess alternative sites.
- 8.2 The main issues raised are summarised in the table below, together with the Council's consideration and response. The detailed responses are contained in Appendix 7.

Table 2: Questionnaire Response - Summary of Main Issues

Site Search Parameters
<p><u>Comments:</u> Three quarters of the respondents felt that Council-owned housing land was appropriate to consider and that private and other publicly owned land should not be included in the site search.</p> <p>A similar number of people felt that the Council should focus on Council owned property, as opposed to adjacent land in other ownerships that may be necessary to develop a Council asset. Reasons given were that non-council land is not affordable and that Council shouldn't be giving more taxpayer's money to the private sector.</p> <p>People were divided about whether Council-owned non-housing land should be included in the site search. Reasons for disagreeing with this parameter included that they felt that with limited space available in the borough and land shouldn't be allocated to travellers; that if other land is to be changed it should be for higher density housing to accommodate more housing units for more people; and, that changes of use should be for high density social housing and community infrastructure to cater for the majority of the local population, not a low density use.</p> <p><u>Council Response:</u></p> <p>Local Authorities have a duty to consider the needs of people in their area with respect to the provision of sites on which caravans can be stationed. The Council is therefore seeking to identify and designate land in the borough to meet that need. The Council continues to provide for 'bricks and mortar' housing to meet the housing needs of the settled community and, in line with 'bricks and mortar' housing, the Council is keen to optimise the actual number of pitches provided on a chosen site. Given the difficulties in identifying a site for gypsy and traveller accommodation and the need for the efficient and effective use of publicly owned urban land all types of Council-owned land will be considered.</p>
One or more sites
<p><u>Comments:</u> Over half of the respondents disagreed that the Council should focus on providing a single site. Reasons for disagreeing were that the Council should consult on all suitable sites and if a site would be overcrowded more than one site should be used. Two of the people who agreed with this parameter did so on the proviso that it should not be located within 3 or 5 miles of an existing site, including in adjoining boroughs.</p>

Council Response:

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.

Given the size of the borough and the difficulties involved in locating a site, it is not proposed to apply constraints relating to distance from existing sites; such a radius (3 miles or 5 miles) would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services.

Type of Site

Comments: The majority of respondents disagreed that the Council should consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and a combination of these types of sites.

Reasons for disagreeing included that as long as the land being considered is uncontaminated, safe and away from pollution there should be no restrictions. If sites have high levels of natural fauna and flora these should not be destroyed if there is suitable brownfield space available. Half of the questionnaire respondents raised that potential sites should not be those that other people are currently using. It was highlighted that taking land used for other purposes will cause problems.

Council Response:

Given the difficulties in identifying a site for gypsy and traveller accommodation and the need for the efficient and effective use of publicly owned urban land all types of Council-owned land will be considered.

Criteria 7 and 8 of the Proposed Site Selection Criteria incorporate judgements about landscaping (7) and local environmental quality, including contamination, noise and air quality (8). In reviewing the options for potential sites, the assessment would take account of these issues.

Size of Site

Comments: Over half of the respondents disagreed that the Council should base a search for sites on an area of 400sqm per pitch. Reasons given for disagreeing included that 400sqm per pitch was at the lower end of the recommendations and that an average of the two limits should be used (557sqm), and that size should depend on the site including proximity to housing and amenities.

Council Response:

400sqm is based on the findings of the 'Net Density and Gypsy & Traveller Sites' working paper, prepared by the London Gypsy & Traveller Unit in (July 2009), which suggests 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.

Criteria 4 and 7 of the Proposed Site Selection Criteria incorporate judgements about size and shape of potential sites with regards to for highways and parking issues (4) and as well as landscaping and play areas (7). In reviewing the options for potential sites, the would take account of issues of size and configuration.

Location of Site

Comments: Almost three quarters of respondents felt that the Council should not exclude potential sites located outside the Borough. Reasons given were that Lewisham needs the land for Council housing, many councils are having to house people away from their borough and that there is limited space in London boroughs. It is noted that the Consultation Document didn't highlight any implications for costs associated with locating a site outside the borough and that the response was the opposite to that regarding whether private and other publicly owned land should be excluded.

Council Response:

Local Authorities have a duty to consider the needs of people in their area with respect to the provision of sites on which caravans can be stationed. The Council is therefore seeking to identify and designate land in the borough to meet that need. The Council continues to provide for 'bricks and mortar' housing to meet the housing needs of the settled community.

Site Selection Criteria

Comments: The majority of questionnaire respondents agreed with the following proposed selection criteria to be used to assess alternative sites: Access to the road network (Criteria 3), Parking, turning, service and emergency vehicles (Criteria 4), Mixed residential and business use opportunities (Criteria 5), Supply essential services (Criteria 6), Healthy lifestyles and integration (Criteria 7).

The majority of questionnaire respondents disagreed with the following proposed selection criteria to be used to assess alternative sites: Effective and efficient use of public assets (Criteria 1), Reasonable access to local shops, services and community facilities (Criteria 2); Spatial planning and development management considerations (Criteria 9) and Deliverability (Criteria 10).

Several questionnaire respondents expressed that a new site shouldn't be located within 3 miles or 5 miles of an existing site and that they should be spread to ensure an even distribution across London. One respondent disagreed with any land being allocated by the council for use by travellers. The reason given was that there is limited space in a central London borough. If the site must be located somewhere it should be in the green belt where there is lots more space.

Council Response:

Given the size of the borough and the difficulties involved in locating a site, it is not proposed to apply this constraint; such a radius (3 miles or 5 miles) would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services.

However, as stated in the Consultation Report, Lewisham will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies.

9.0 Gypsy and Traveller Forum Meeting (24.02.2016)

- 9.1 On the 24th February 2016 a Gypsy and Traveller Forum meeting was convened to discuss the consultation issues. The key issues identified are summarised in the table below.

Table 3: Gypsy and Traveller Forum Meeting (24.02.2016) – Summary of Key Issues

Accommodation Need
<p><u>Comments:</u> Concerns were expressed within the Gypsy and Traveller community that their needs had not been prioritised and that many of them had moved to surrounding boroughs to access housing, but wished to return. Moreover, it was stated that many members of the community had been living in temporary accommodation since a previous site closed in 2009.</p> <p><u>Council Response:</u> The purpose of the Gypsy and Traveller Site(s) Local Plan is to ensure identified need is provided for within the borough.</p>
Assessment of Need
<p><u>Comments:</u> Concern was expressed regarding the implications of the revised planning definition of Gypsies and Travellers in terms of identifying need for a new site within the borough.</p> <p><u>Council Response:</u> It was agreed that the needs assessment would need to be revisited in the light of the new definition.</p>
Site Requirements
<p><u>Comments:</u> Key requirements identified for a new site included children’s play provision and access to day-care facilities.</p> <p><u>Council Response:</u> Within the published Regulation 18 Consultation Report, site selection criterion 7 ‘Scope for healthy lifestyles and integration’ includes opportunities for the incorporation of adequate play areas. Criterion 2 specifies the need for the site to afford reasonable access to community facilities which includes day-case facilities.</p>
Site Design
<p><u>Comments:</u> The Coldharbour Lane site Maidstone, the proposed design for the Church Grove site, and the relocated Olympic site in Tower Hamlets were all identified as best practice examples of modern permanent Gypsy and Traveller sites.</p> <p><u>Council Response:</u> The Council notes the examples given.</p>

10.0 London Gypsy and Traveller Unit Meeting (LGTU) (14.04.2016)

- 10.1 On the 14th April 2016 representatives of the Council's planning team met with representatives of the London Gypsy and Traveller Unit (LGTU) to discuss the consultation issues. The key issues discussed are summarised in the table below.

Table 3: London Gypsy and Traveller Forum Meeting (14.04.2016) – Summary of Key Issues

Definition of Need
<p><u>Comments:</u> Concerns were expressed regarding the interpretation of the definition of Gypsies and Travellers. Members of the London Gypsy and Traveller Unit stated that they felt that had been inconsistencies with respect to the Consultants' application of the definition of need. They stated that the Consultants were employing a restrictive definition which was based solely on whether Gypsies and Travellers had travelled for work purposes in the last 12 months. The members of the London Gypsy and Traveller Unit stated that in other boroughs travelling for family reasons or access to fairs was encompassed in the needs assessments. They identified other Gypsy and Traveller studies for other London boroughs, undertaken by the same consultants commissioned for Lewisham, which had produced a zero figure for need.</p> <p><u>Council Response:</u> The Council acknowledges the concern expressed by the members of the LGTU. The methodology to be used to re-survey the community will seek to collect a range of information about the participants in order to obtain a full picture of their lifestyle as it relates to the definition of Gypsy and Traveller.</p>
Site Size and Layout
<p><u>Comments:</u> The representatives of the London Gypsy and Traveller Unit commented on the physical configuration of a site and any pitches to be provided. They commented that 400 sqm would be somewhat tight, if it included turning, and added that feasibility work would need to be done on the site layout.</p> <p><u>Council Response:</u> In reviewing the options for potential sites, the Council would take account of issues of size and configuration.</p>
Allocations/Waiting List Policy
<p><u>Comments</u> There was some discussion regarding an allocations policy and associated waiting list to decide on the occupants of any identified pitch provision. The London Gypsy and Traveller Unit representatives cited examples of the policies of other London boroughs and asked to be consulted on a draft allocations policy for Lewisham.</p>

Council Response:

The Council representatives responded that an allocations policy and associated waiting list would be produced. The Council's planning team representatives undertook to inform the Corporate Working Group that the LGTU wish to be consulted on the draft allocations policy.

11.0 SA Scoping Report Consultation Responses

- 11.1 Responses commenting on the Sustainable Appraisal Scoping Report were received from the Environment Agency and Natural England.

Table 4: SA Scoping Report: Written Representations - Summary of Main Issues

Environment Agency
<p><u>Comments:</u> The Environment Agency made a number of requests for additions and amendments to the pertinent plans, policies and programmes identified in Tables 3.1 and 5.1 and in Appendix A to the report. Full details of their comments are contained in Appendix 6. They also requested that the following be included as a key issue in table 5.1:</p> <p style="text-align: center;"><i>Spaces and places need to be of high design quality, respecting historical and natural features and promoting local distinctiveness, providing access for all.</i></p> <p><u>Council Response:</u> The London Borough of Lewisham will address the matters raised through the Sustainability Appraisal process, which will be documented in the Sustainability Appraisal Report.</p>
Natural England
<p><u>Comments:</u> Natural England stated that they were broadly supportive of the sustainability objectives, but recommended the inclusion of an objective relating to the creation, management and enhancement of green infrastructure. Natural England also suggested that it might be advantageous for the scoping report to look at greenspace provision to assist in the targeting of where new green infrastructure and greenspace provision, would have most benefits, particularly in relation to biodiversity, human wellbeing and health.</p> <p><u>Council Response:</u> The London Borough of Lewisham will address the matters raised through the Sustainability Appraisal process, which will be documented in the Sustainability Appraisal Report.</p>

12.0 Conclusions and Statement of Compliance

- 12.1 This Consultation Statement serves as a record of the consultation undertaken by the London Borough of Lewisham for Stage One: Scope, Search Parameters and Selection in the preparation of the Gypsy and Traveller Site (s) Local Plan (GTSLP). It demonstrates that public consultation undertaken by the Council on the Regulation 18 Consultation Report, between the 3rd March 2016 and 22nd April 2016, exceeded the minimum Government requirements for consultation on DPDS set out in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹ and followed the Council's standards for community participation set out in the Statement of Community Involvement (SCI), adopted in 2006.
- 12.2 There was a modest response to the consultation. In general there was a mix of written representations from statutory organisations and the general public. The thoughts of Gypsies and Travellers were effectively captured via targeted meetings with members of this community.
- 12.3 The responses to the consultation will be used to shape and inform the next stage of the preparation of the GTSLP. The following are ways in which responses to this consultation may be taken account of:
- Where appropriate, emails will be exchanged with respondents to discuss the issues raised and share information to improve the quality of the emerging Gypsy and Traveller Site(s) Local Plan
 - Further meetings will be arranged to take the plan forward and deal with the issues raised
 - Work that has already been drafted is being reviewed and changes made where appropriate to address the issues that have been raised.
 - All comments submitted are being considered in the light of on-going work and our ability to address the issues raised
- 12.4 The Planning Policy team will work to ensure that the report on the preferred site or sites addresses the points raised before it is issued for consultation later this year.

Appendix 1: Specific Consultation Bodies

The Town and Country Planning (Local Planning) (England) Regulations 2012 define the following organisations as 'specific consultation bodies':

- The Coal Authority
- The Environment Agency
- Historic England
- Marine Management Organisation
- Natural England
- Network Rail Infrastructure Limited
- The Highways Agency
- Adjoining Local Planning Authorities
- Relevant telecommunications companies
- Lewisham Clinical Commissioning Group
- NHS England
- Relevant electricity and gas companies
- Thames Water
- The Mayor of London (including the designated housing function and TfL)

The Council consulted as a minimum the following bodies on the scope of the Sustainability Appraisal:

- Environment Agency
- Natural England
- Historic England
- Sport England

Local Policing Body

- The Mayor's Office for Policing and Crime

Appendix 2: General Consultation Bodies & Other Consultees

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority's area and other bodies who represent, in the authority's area, the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and business interests.

The Lewisham Planning Policy database contains over 1,500 groups, organisations and companies from the following categories:

- Adjoining boroughs
- Advice and information groups
- Amenity groups 21
- Architects, planners and other professionals
- Black and Minority Ethnic Groups
- Builders
- Community groups
- Conservation and heritage groups
- Developers
- Disability groups
- Education/children/young people's groups
- Elderly groups
- Employment/business interests
- Environmental and ecology groups
- Faith groups
- Health organisations including NHS Trusts
- House builders
- Housing associations
- Landowners
- Police and other emergency services
- Political parties
- Regeneration groups and partnerships
- Rivers and riverside interest groups
- Shopkeepers
- Sport and leisure groups
- Statutory consultees
- Tenants and residents associations
- Town centre partnerships
- Transport groups
- Utility companies
- Women's groups
- Youth Groups

Appendix 3: Notification of Public Consultation



LONDON BOROUGH OF LEWISHAM
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning) (England) Regulations 2012
Public participation on the preparation of a local plan

The Council intends to prepare a **Gypsy and Traveller Site(s) Local Plan (GTSLP)** which will allocate a site or sites to accommodate Gypsies and Travellers in the borough. The Council has identified issues the GTSLP is likely to include and would like to hear your views about the scope, search parameters and selection criteria.

The relevant documents will be available at the following locations and times: **Thursday 3rd March 2016 to Friday 22nd April 2016:**

- **On line** at <http://lewisham-consult.objective.co.uk/portal> or www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Gypsy-and-Traveller-local-plan.aspx
- **London Borough of Lewisham** Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 8.30am to 5pm).
- **All Public and Community Libraries** for details of locations and opening hours visit www.lewisham.gov.uk/libraries or telephone 020 8314 6399

Representations must be in writing (either online or by hand) and will need to arrive at the addresses specified below by **5pm, Friday 22nd April 2016**.

- Online at <http://lewisham-consult.objective.co.uk/portal>
- By e-mail to planning.policy@lewisham.gov.uk
- By post to Planning Service, London Borough of Lewisham, 3rd Floor Laurence House, 1 Catford Road, London, SE6 4RU

All representations received will be considered through the process of preparing the draft local plan.

If you have any queries please contact the Planning Service on 020 8314 7400.

M. KIELY
Head of Planning (acting)
Laurence House
1 Catford Road
SE6 4RU

Appendix 4: Consultation on Sustainability Appraisal Scoping Report - Example of Letter Sent to Authorities with Environmental Responsibilities



Department for Environment,
Food and Rural Affairs
Nobel House
17 Smith Square
SW1P 3JR

Brian Regan

planning.policy@lewisham.gov.uk
Tel: 020 8314 7400

Date: 8th March 2016

Dear Sir/Madam

Lewisham Gypsy & Traveller's Site Local Plan (GTSLP) – Consultation on Sustainability Appraisal Scoping Report

We are currently consulting on the Sustainability Appraisal Scoping Report for the Lewisham Gypsy & Traveller's Site Local Plan (GTSLP).

Scoping forms the initial stage of the Sustainability Appraisal (SA) process and incorporates the collection of baseline data and information on other plans, policies and programmes that can influence the preparation of the Gypsy & Traveller Sites Local Plan. The data presented in the Sustainability Appraisal Scoping Report identifies key sustainability issues, objectives and targets. The information contained within the report will be used to inform the SA framework.

We are consulting on the Sustainability Appraisal and Scoping Report for a period of 6 weeks between **Thursday 3rd March 2016 to Friday 22nd April 2016**. During the consultation period, we encourage comments to be submitted, where you can suggest improvements or point out if there is anything we have missed.

The relevant documents are available at the following locations:

- On our website at:
<https://www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Gypsy-and-Traveller-local-plan.aspx>
- On our Objective portal at:
<http://lewisham-consult.objective.co.uk/portal>
- **London Borough of Lewisham** Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 8.30am to 5pm).
- **All Public and Community Libraries** for details of locations and opening hours visit www.lewisham.gov.uk/libraries or telephone 020 8314 6399

Representations must be made in writing (including electronically) and will need to arrive at the addresses specified below by **5pm, Friday 22nd April 2016**.

- By e-mail to planning.policy@lewisham.gov.uk
- By post to Planning Service, London Borough of Lewisham, 3rd Floor Laurence House, 1 Catford Road, London, SE6 4RU

If you have any queries please contact the Planning Service on 020 8314 7400.

Yours Sincerely

Brian M Regan, Planning Policy Manager

Appendix 5: Press Notice - South London Press, 1st March 2016



**LONDON BOROUGH OF LEWISHAM
Planning and Compulsory Purchase Act 2004
Town and Country Planning (Local Planning)
(England) Regulations 2012
Public participation on the preparation of
a local plan**

The Council intends to prepare a **Gypsy and Traveller Site(s) Local Plan (GTLP)** which will allocate a site or sites to accommodate Gypsies and Travellers in the borough. The Council has identified issues the GTLP is likely to include and would like to hear your views about the scope, search parameters and selection criteria.

The relevant documents will be available at the following locations and times: **Thursday 3rd March 2016 to Thursday 14 April 2016:**

- **On line** at <http://lewisham-consult.objective.co.uk/portal> or www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Gypsy-and-Traveller-local-plan.aspx
- **London Borough of Lewisham** Ground Floor, Laurence House, 1 Catford Road, London, SE6 4RU (Monday to Friday 8.30am to 5pm).
- **All Public and Community Libraries** for details of locations and opening hours visit www.lewisham.gov.uk/libraries or telephone 020 8314 6399

Representations must be in writing (including electronically) and will need to arrive at the addresses specified below by **5pm, Thursday 14th April 2016.**

- Online at <http://lewisham-consult.objective.co.uk/portal>
- By e-mail to planning.policy@lewisham.gov.uk
- By post to Planning Service, London Borough of Lewisham, 3rd Floor Laurence House, 1 Catford Road, London, SE6 4RU

All representations received will be considered through the process of preparing the draft local plan.

If you have any queries please contact the Planning Service on 020 8314 7400.

M. KIELY
Head of Planning (Acting)

Laurence House
1 Catford Road
SE6 4RU

Appendix 6: Table of Written Representations made on the GTSLP and Sustainability Appraisal Scoping Report during the Regulation 18 public consultation

There were 17 respondents to the consultation. Officers have reviewed the representations received and provided comments in response.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
1	Miss Judith Cooke, Planning Advisor	Environment Agency (EA)	<p><u>Flood risk</u></p> <ul style="list-style-type: none"> Flood risks from all sources need to be included in the Sustainability Appraisal (SA). SA needs to demonstrate how sites in flood risk locations have been sequentially tested and that it will be feasible, in principle, to meet the requirements of the Exception Test where necessary. When assessing sites the council should be mindful of the highly vulnerable nature of this use to flooding identified within the supporting technical guidance to the National Planning Policy Framework. The SA appraisal needs to be informed by an up to date strategic flood risk assessment (SFRA). Since the publication of the council's latest version in 2015, The EA has completed updated flood modelling of the risk of flooding from the River Ravensbourne and its tributaries. This new information has not yet been transferred into the EA's published Flood Map for Planning. This is expected to be updated later this year. In the meantime it should be considered as the best available data and considered in the assessment of flood risk to the site allocations. New EA guidance issued on revised, higher allowances for the potential impacts of climate 	<ul style="list-style-type: none"> Noted. Noted The Council will work closely with the EA to ensure the new data is taken account of in the site selection process. The Council will work closely with the EA to ensure the new guidance is taken account of in the site selection process and the

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances) Allowances indicate greater future flood impact and need to be included. The EA would welcome the opportunity to discuss how this would inform the SFRA and the preparation of the GTLP.</p> <p><u>River corridors and biodiversity</u></p> <ul style="list-style-type: none"> EA agree there is a need to augment the Core Strategy criteria for Gypsy and Traveller to respond more robustly to local environmental quality issues EA Recommend that Core Strategy Policy 2 is amended to include the following additional specific selection criterion: <i>Any business activities follow regulations/ good practice and do not have a negative impact on the quality of the river corridor or on the biodiversity value of any neighbouring sites which support protected or priority habitats or species.</i> <ul style="list-style-type: none"> Request that the explanation and application of Table 5.1 Proposed Site Selection Criteria point 5 (Mixed residential and business use opportunities) be amended as highlighted in bold below <i>(b) Any likely adverse impacts are acceptable (assuming environmental permitting regulations, licensing and planning conditions manage activities that could be carried out).</i> <p><u>Land contamination</u></p> <ul style="list-style-type: none"> Pleased proposed site selection criteria will address the importance of considering the condition of 	<p>preparation of the GTLP.</p> <ul style="list-style-type: none"> Noted. The Council will consider the inclusion of this in the policies for the site or sites. Agree. Text will be amended. Noted

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>brownfield sites. The condition of the land could restrict the use of SUDS and could incur additional costs through the need to address contamination issues.</p> <ul style="list-style-type: none"> • Note potential beneficial effects of return to use of brownfield land in terms of improvements in land and water quality. • The Environment Agency also made comments on the Sustainability Appraisal Scoping Report. These will be addressed in a respond to that document. <p>Lewisham Gypsy & Traveller's Site Local Plan (GTSLP) – Consultation on Sustainability Appraisal Scoping Report</p> <p><u>Table 3.1 Plans, Policies and Programmes</u></p> <p>Please add the following to the National section:</p> <ul style="list-style-type: none"> • Natural Environment and Rural Communities (NERC) Act, 2006 • Wildlife and Countryside Act, 1981 (as amended) • Countryside and Rights of Way Act, 2000 • National Flood Risk Assessment, Environment Agency • Thames Flood Risk Management Plan, Environment Agency 2015 <p>and change:</p> <ul style="list-style-type: none"> • Environment Agency, Creating a better place strategy 2010-2015 <p>to</p> <ul style="list-style-type: none"> • Environment Agency Corporate Plan, Creating a 	<ul style="list-style-type: none"> • The London Borough of Lewisham will address the matters raised through the Sustainability Appraisal process, which will be documented in the Sustainability Appraisal Report.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>better place 2014 to 2016.</p> <ul style="list-style-type: none"> • Thames River Basin Management Plan (2009) <p>to</p> <ul style="list-style-type: none"> • Thames River Basin Management Plan, December 2015. <p>Please add to the Lewisham section:</p> <ul style="list-style-type: none"> • Local Flood Risk Strategy, London Borough of Lewisham 2015 • Local Flood Risk Management Plan, London Borough of Lewisham 2015 (Objectives are published within the Environment Agency Thames Flood Risk Management Plan). <p><u>Table 5.1: Sustainability Requirements, Issues and Trends</u> Under Effective protection of the Environment and prudent use of resources, please add the following sources:</p> <ul style="list-style-type: none"> • Natural Environment and Rural Communities (NERC) Act, 2006, Sections 40 and 41 • Wildlife and Countryside Act, 1981 (as amended) • Countryside and Rights of Way Act, 2000 • Pollution Prevention Guidelines <p>to the list against the key issue, “Gypsy and Traveller sites should be provided at locations with good access to open space. The adequacy and quality of open space should be considered. The provision of Gypsy and Traveller sites should be balanced with the protection of designated nature conservation sites, biodiversity, flora and</p>	

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>fauna.”</p> <p>We ask that the following key issue be amended as highlighted below in bold:</p> <p style="padding-left: 40px;">“Spaces and places need to be of high design quality, respecting historical and natural features and promoting local distinctiveness, providing access for all.”</p> <p>and that the Lewisham River Corridor Improvement Plan (2015) be included with the corresponding policy context.</p> <p><u>Appendix A Plans, Policies and Programmes</u></p> <p>Please make the corresponding changes here that we have mentioned above for Table 3.1</p>	
2	Local Resident (Identify Confidential)	Individual	<ul style="list-style-type: none"> • Confidential - Comments omitted due to requirements of the Local Government (Access to Information) Act 1985 and the Equalities Act 2010. 	<ul style="list-style-type: none"> • The Local Government (Access to Information) Act 1985 requires any material which is defamatory or likely to incite racial hatred or contempt, to be marked 'confidential' and not disclosed to the public. The Equalities Act 2010 makes it unlawful for anyone to induce or attempt to induce another person to discriminate on the grounds of race.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
3.	Stewart Murray, Assistant Director – Planning	Greater London Authority	<ul style="list-style-type: none"> • No specific comments regarding the scope, search parameters and selection criteria. • Borough needs to meet Government's Planning Policy for Traveller sites and London Plan policy including policy 3.8 	<ul style="list-style-type: none"> • Agreed.
4.	Ian Duffy	Individual	<ul style="list-style-type: none"> • Sensible Approach • Request for clarification regarding 'relative weighting of judgement on impact on existing local users by the travellers versus impact of the local users on the travelling community.' 	<ul style="list-style-type: none"> • In accordance with the Government's Planning Policy for traveller sites (para.4.k) the evaluation of a site would have due regard to the protection of local amenity and the local environment and 'protect local amenity and environment' (para.10.e).
5.	Lee Longhurst, Deputy team leader of Plan Making	Croydon Borough Council	<ul style="list-style-type: none"> • Need to consider the possible impact of the location of sites in areas where there is already a high level of social deprivation. Where services are already under pressure it may not be advisable to compound this by siting a new gypsy and traveller site in such an area. Suggest consideration of above criterion for site selection. 	<ul style="list-style-type: none"> • Given the difficulties in identifying a site, it is not proposed that additional geographical constraints are identified. • It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services. In addition, criterion 2 of the proposed site selection criteria will ensure any occupants of a proposed site or sites will have access to essential local services and community facilities. Criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
6.	Respondent's name not given.	Marine Management Organisation (MMO)	<ul style="list-style-type: none"> No specific comments. General guidance for development outlined with respect to the areas covered by the MMO. 	<ul style="list-style-type: none"> Noted.
7.	Mats Staafgard	Individual	<ul style="list-style-type: none"> Request for clarification regarding the location of potential Ladywell site. Opposition to the provision of Traveller's sites due to potential recipients currently being already accommodated in permanent buildings in the form of houses and council flats. 	<ul style="list-style-type: none"> The public consultation on a preferred site or sites is scheduled for Autumn 2016. This will identify the location of the potential site or sites. The Lewisham Gypsy and Traveller Accommodation Needs Assessment (GTANA) will be revised to take account of the new definition of "gypsies and travellers" set out in Annex 1 to the Government's 'Planning policy for traveller sites,' and will consider whether Gypsies and Travellers have previously led a nomadic habit of life, the reasons for ceasing their nomadic habit of life, whether they intend to live a nomadic habit of life in the future, and if so, how soon and in what circumstances.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
8.	Mrs Trang Dinh	Individual	<ul style="list-style-type: none"> Request to include reference to a sites not being located with a three mile radius of existing Gypsy and Traveller sites. <p>Proposed text: <i>New Gypsy & Traveller Sites should not be located within three miles of existing Gypsy & Traveller Sites whether in Lewisham or a neighbouring borough. This will ensure better integration of Gypsies & Travellers into existing communities and ensure there are enough resources to support Gypsies & Travellers locally.</i></p>	<ul style="list-style-type: none"> Given the size of the borough and the difficulties involved in locating a site, it is not proposed to apply this constraint; such a radius (3 miles/5 km) would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services. <p>Integration with the existing communities in terms of the access of the site to services and community facilities such as schools and health services it is set out in criterion 2 of the Proposed Site Selection Criteria and criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure. .</p> <p>However, as stated in the Consultation Report, Lewisham will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies.</p>
9.	Mr Jamie Melvin Planning Adviser West Anglia Team	Natural England	<p>Lewisham Gypsy & Traveller's Site Local Plan (GTSLP) – Consultation on Sustainability Appraisal Scoping Report</p> <ul style="list-style-type: none"> Natural England is broadly supportive of the Sustainability objectives, but would recommend that there is an objective relating to the creation, management and enhancement of green infrastructure. It may also be helpful for the scoping 	<ul style="list-style-type: none"> The London Borough of Lewisham will address the matters raised through the Sustainability Appraisal process, which will be documented in the Sustainability Appraisal Report.

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>report to look at greenspace provision to assist in the targeting of where new green infrastructure and greenspace provision would have the most benefits, particularly in relation to biodiversity, human wellbeing and health.</p> <ul style="list-style-type: none"> The Gypsy and Traveller Local Plan appears to be of relatively low risk to the ecological assets which compose our statutory purpose. We therefore have no detailed comments to make on the document presented. 	
10.	Claire Parker Assistant Planning Consultant for and on behalf of Cassidy + Ashton Group Ltd	Oceanwave Estates Ltd. (Owners of land at Hither Green to the rear of St Mildred's Road and Rayford Avenue / Ronver Road)	<ul style="list-style-type: none"> Request for land at Hither Green to the rear of St Mildred's Road and Rayford Avenue / Ronver Road. Oceanwave Estates Ltd. to be considered as a potential gypsy and traveller site. 	<ul style="list-style-type: none"> The information regarding this site has been noted and the agreed site selection criteria will be applied to assess its suitability.
11.	Scott Barkwith	Individual	<ul style="list-style-type: none"> Request to include reference to a sites not being located with a three mile radius of existing Gypsy and Traveller sites to ensure that resources are available to support them and ensure better integration of this community. 	<ul style="list-style-type: none"> Given the size of the borough and the difficulties involved in locating a site, it is not proposed to apply this constraint; such a radius (3 miles/5 km) would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
				<p>will significantly add to pressure on local services.</p> <p>Integration with the existing communities in terms of the access of the site to services and community facilities such as schools and health services it is set out in criterion 2 of the Proposed Site Selection Criteria and criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure. .</p> <p>However, as stated in the Consultation Report, Lewisham will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies.</p>
12.	Trina Lynskey	Individual	<ul style="list-style-type: none"> Request to include reference to a sites not being located with a three mile radius of existing Gypsy and Traveller sites to ensure that resources are available to support them and ensure better integration of this community. 	<ul style="list-style-type: none"> Given the size of the borough and the difficulties involved in locating a site, it is not proposed to apply this constraint; such a radius (3 miles/5 km) would be excessively restrictive in terms of site identification and the justification in terms of the impact on local services and resources unsubstantiated. It is not envisaged that the occupancy population generated by the provision of the site will be of a level that will significantly add to pressure on local services. <p>Integration with the existing communities in terms of the access of the site to services and community facilities such as schools and health services it is set out in criterion 2 of the Proposed Site Selection Criteria and</p>

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
				<p>criteria 3, 6 and 7 satisfactorily deal with other aspects of local infrastructure. .</p> <p>However, as stated in the Consultation Report, Lewisham will explore constructive approaches to the identification of a Gypsy and Traveller site or sites with neighbouring authorities and other public bodies.</p>
13.	Cameron Wallace Planner – Borough Planning	Transport for London	<ul style="list-style-type: none"> • Need to have regard to the development of strategic transport infrastructure in the assessment of specific sites for gypsy and traveller accommodation. For example, the proposed Bakerloo line extension to Lewisham. 	<ul style="list-style-type: none"> • Criterion 9 of the Proposed Site Selection Criteria satisfactorily addresses spatial planning and development management considerations.
14.	David Wilson BA (Hons), BTP, MRTPI Associate Director Planning, Savills	Thames Water	<ul style="list-style-type: none"> • To comment on the sewerage requirements an indication of the location and number of pitches being proposed would be necessary in order to model the impacts on the existing systems. • Noted: generally quicker to deliver infrastructure on a small number of clearly defined large sites than it is in a large number of less clearly defined small sites. • In the absence of sewers within the vicinity, the developer of the accommodation will be required to make provision for wastewater services either via connection to public sewerage network or on-site provision via, for example , a septic tank. • Recommend a specific Policy dealing with water and sewerage infrastructure along the lines of the 	<ul style="list-style-type: none"> • Noted. This will be forthcoming at the next stage of consultation. • Noted • Noted • Proposed Site Selection 6 satisfactorily

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>following:</p> <p><u>“Water Supply, Wastewater & Sewerage Infrastructure</u></p> <p><i>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</i></p> <p><i>Drainage on the site must maintain separation of foul and surface flows.</i></p> <p><i>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</i></p>	<p>deals with the supply of essential services (including water, sewerage and drainage). A detailed study may be necessary to support a planning application for a gypsy and traveller site.</p>
15.	Brenda Johnson	Individual	<ul style="list-style-type: none"> • Request for clarification regarding location of potential sites • Request for clarification regarding work schedule and timescales for plan production 	<ul style="list-style-type: none"> • The Consultation Report proposes a set of criteria to identify an appropriate site or sites. The identity and location of the preferred site or sites will be published at the next round of public consultation. • The proposed timescales for the plan are outlined in the Consultation Report (Table 6.1 Proposed Timetable, p12).

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
16.	John	Individual	<ul style="list-style-type: none"> Suggestion to consider locating a site on 'plot A Catford resi development by the station.' 	<ul style="list-style-type: none"> Planning permission was granted in 2014 for the redevelopment of the Catford Stadium site for 589 homes (DC/13/84895) and the scheme is currently being built-out. There is a current planning application (DC/15/94002) for the redevelopment Plot A (to the north of the site, in between Catford and Catford Bridge Stations) for a part 18/part 19 residential tower.
17.	Ilinca Diaconescu,	London Gypsy and Traveller Unit	<ul style="list-style-type: none"> The provision of accommodation within the borough for Gypsies and Traveller is a matter of urgency. Concerned that a review of the Gypsy and Traveller Accommodation Needs Assessment might result in a lower figure of need due to: <ol style="list-style-type: none"> Difficulties in securing the same number of households for further interviews An incorrect interpretation of the planning definition of travellers which fails to take account of the need to accommodate young families in the future and the reasons why travellers have stopped travelling related to education, healthcare and access to employment opportunities, plus tenancy restrictions, as well as the lack of currently available site accommodation and limited possibilities to travel Account needs to be taken of the diverse reasons for travelling, including cultural and traditional reasons such as visiting family, attending weddings and funerals, attending religious events and pilgrimages, and going to fairs. Identification of a suitable site must be a high priority after unsuccessful prior searches. Criteria should not unduly hinder the selection of a site and if a number of 	<ul style="list-style-type: none"> Noted Noted. Noted Noted

Number	Respondent's Name	Capacity of Response	Summary of representation	Officers' response
			<p>constraints are identified for the options resulting from the site search, the council should demonstrate how these could be mitigated.</p> <ul style="list-style-type: none"> • Site selection criteria: in assessment of potential sites the shape of the site, the shape of the pitches and what can fit on them need to be evaluated. • Need for a clear, transparent mechanism for establishing who will be a priority for accessing the pitch. 	<ul style="list-style-type: none"> • Criteria 4 and 7 of the Proposed Site Selection Criteria incorporate judgements about size and shape of potential sites with regards to for highways and parking issues (4) and as also landscaping and play areas (7). • Noted. The Director of Customer Services is intending to prepare a waiting list and allocations policy.

Appendix 7: Questionnaire Response

The Council received 8 on-line questionnaire responses. The questionnaire comprised a series of 19 questions designed to obtain feedback on:

- proposed search parameters to be used to identify a site or sites
- proposed selection criteria to assess alternative sites

Site Search Parameters

A series of 9 questions were used to obtain feedback on the proposed search parameters to be used to identify a site or sites. These are outlined below under the headings

Land ownership type

1. Do you think that **“Council-owned housing land”** is an appropriate parameter? (Please refer to Paragraph 5.2 of the Consultation Report.) Please explain your response below.
2. Do you think that **Council-owned non-housing land** is an appropriate criteria? (Please refer to Paragraph 5.3 of the Consultation Report.) Please explain your response below.
3. Do you think that **private and other publicly owned land** is an appropriate criteria? (Please refer to Paragraph 5.4 of the Consultation Report.) Please explain your response below.

Other parameters

4. Do you think that the Council should **focus on Council-owned property, as opposed to adjacent land in other ownerships that may be necessary to develop a Council asset?** (Please refer to Paragraph 5.6 of the Consultation Report.) Please explain your response below.
5. Do you think the Council should **focus on a single site?** (Please refer to Paragraph 5.7 of the Consultation Report.) Please explain your response below.
6. Do you think that the Council should **consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and a combination of these types of sites?** (Please refer to Paragraph 5.9 of the Consultation Report.) Please explain your response below.
7. Do you think that the Council should **base a search for sites on an area of 400 sqm per pitch?** (Please refer to Paragraph 5.9 of the Consultation Report.) Please explain your response below.
8. Do you think that the Council should **exclude geographical preferences?** (Please refer to Paragraph 5.10 of the Consultation Report.) Please explain your response below.
9. Do you think that the Council should **exclude potential sites located outside the Borough?** (Please refer to Paragraph 5.11 of the Consultation Report.) Please explain your response below.

Site Selection Criteria

A series of 10 questions were used to obtain feedback on the 10 proposed selection criteria to assess alternative sites.

- Do you support Site Selection Criteria [...] as currently proposed? (Please refer to Table 5.1 of the Consultation Report.) Please explain your response below.

Summary of Key Findings

Search parameters to be used to identify a site or sites

The key findings of the questionnaire response are summarised below and the detailed response is presented in **Tables 1 to 4**.

The majority of questionnaire respondents agreed with the following parameters to be used to identify a site or sites:

- **Council-owned housing land** - 75% felt that Council-owned housing land was appropriate to consider. One person who disagreed explained that Council needed to clarify that is land that doesn't currently have housing on it.
- **Private and other publicly owned land** - 75% felt that private and other publicly owned land should not be included in the site search. Reasons given were that the council cannot afford to buy land for low density housing.
- **Focus for site search** - around 70% felt that the Council should focus on Council owned property, as opposed to adjacent land in other ownerships that may be necessary to develop a Council asset. Reasons given were that non-council land is not affordable and that Council shouldn't be giving more taxpayer's money to the private sector.
- **Geographical preferences** - 60% agreed that the Council should exclude geographical preferences.

There was a divided response to the following parameter:

- **Council-owned non-housing land** - Respondents were divided about whether Council-owned non-housing land should be included in the site search. One of the people who agreed with this parameter explained that it would be a quicker and less expensive option.
Three of the people who disagreed, explain that they felt that with limited space available in the borough, land shouldn't be allocated to travellers; that if other land is to be changed it should be for higher density housing to accommodate more housing units for more people; and, that changes of use should be for high density social housing and community infrastructure to cater for the majority of the local population, not a low density use.

The majority of questionnaire respondents disagreed with the following parameters to be used to identify a site or sites:

- **One or more sites** - Around 60% disagreed that the Council should focus on a single site. Reasons for disagreeing were that the Council should consult on all suitable sites and if a site would be overcrowded more than one site should be used. Two of the people who agreed with this parameter did so on the proviso that it should not be located within 3 or 5 miles of an existing site, including in adjoining boroughs.
- **Type of site** – Around 88% disagreed that the Council should consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and a combination of these types of sites. Reasons for disagreeing included that as long as the land being considered is uncontaminated, safe and away from pollution there should be no restrictions. If sites have high levels of natural fauna and flora there should not be destroyed if there is suitable brownfield space available. Half of the questionnaire respondents raised that potential sites should not be those that other people are currently using. It was highlighted that taking land used for other purposes will cause problems.
- **Size of site** - Around 60% disagreed that the Council should base a search for sites on an area of 400sqm per pitch. Reasons given for disagreeing included that 400sqm per pitch was at the lower end of the recommendations and that an average of the two limits should be used (557sqm), and that size should depend on the site including proximity to housing and amenities.
- **Location of site** - Around 70% felt that the Council should not exclude potential sites located outside the Borough. Reasons given were that Lewisham needs the land for Council housing, many councils are having to house people away from their borough and

that there is limited space in London boroughs. It is noted that the Consultation Document didn't highlight any implications for costs associated with locating a site outside the borough and that the response was the opposite to question 3, where 75% felt that private and other publicly owned land should be excluded.

Site Selection Criteria

The key findings of the questionnaire response are summarised below and the detailed response is presented in **Table 5** and **Table 6**.

The majority of questionnaire respondents agreed with the following proposed selection criteria to be used to assess alternative sites. They are presented from the highest to lowest level of support.

- **Criteria 6 (Supply of essential services) – 86%** supported Criteria 6 relating to supply of essential services such as water, sewerage and drainage and waste disposal.
- **Criteria 8 (Local environmental quality) – 86%** supported Criteria 8 relating to contamination, noise, air quality and flooding.
- **Criteria 4 (Parking, turning, service and emergency vehicles) – 71%** supported Criteria 4 relating to the capability of satisfactory provision for parking, turning, service and emergency vehicles.
- **Criteria 7 (Healthy lifestyles and integration) – 67%** supported Criteria 7 relating to opportunities for health lifestyles such as adequate landscaping and play areas and a high standard of design and landscaping which facilitates the integration of the site with the surrounding environment and amenity of the occupiers adjoining the site. One participant raised that provision for site maintenance must be factored on and that it shouldn't be up to residents alone to maintain the site.
- **Criteria 5 (Mixed residential and business use opportunities) – 67%** supported Criteria 5 relating to mixed-use residential and business use being acceptable in principle and that any likely adverse impacts are acceptable. The meaning of this criteria may have been unclear to some respondents. One participant disagreed with this criteria on the basis that 'given the client group, unless the business use it tailored for them, it's going to be difficult to market and get people to work there.'
- **Criteria 3 (Access to the road network) – 57%** supported Criteria 3 relating to safe and reasonably convenient access to the road network. One respondent who disagreed with this criteria felt that it was a 'nice to have' rather than a necessity.

The majority of questionnaire respondents disagreed with the following proposed selection criteria to be used to assess alternative sites.

- **Criteria 2 (Reasonable access to local shops, services and community facilities in particular schools and health services) – 83%** didn't support Criteria 2 as currently proposed. Reasons given included that proximity to public transport wasn't necessary for a traveller site and that there are many places in Lewisham that don't meet this. It was therefore considered a 'nice to have' criteria rather than a necessity.
- **Criteria 9 (Spatial planning & development management considerations) – 80%** didn't support Criteria 9, relating to spatial planning and development management considerations, as currently proposed. The meaning of this criteria given in the explanation may have been unclear to some respondents. Reasons given for disagreeing with this criteria included that no site should be located within 3 to 5 miles of an existing gypsy and traveller site and that a no site should be located in a built up area like Lewisham.
- **Criteria 10 (Deliverability) – 71%** didn't support Criteria 2 as currently proposed. The explanation of the criteria given was that sites should be available now, offer a suitable location for development and be achievable with realistic prospect that development will be delivered on the site within five years. Reasons given for disagreeing with this criteria included that it may eliminate some sites that 'would do', that no site should be located within 3 to 5 miles of an existing gypsy and traveller site and that a no site should be located in a built up area like Lewisham.

- **Criteria 1 (Effective and efficient use of public assets) – 62%** didn't support Criteria 2 as currently proposed. Reasons given included that the distance from shops and health facilities is too far for those with mobility issues, and three respondents felt that gypsy and traveller sites shouldn't be concentrated in one area or neighbourhood.

Table 1: Quantitative Feedback – Site Search Parameters: Land Ownership Type

Do you think that “...” is an appropriate parameter/criteria?

Land Ownership Type	RESPONSE COUNT			No. of Responses
	Yes	No	No response	
Council-owned housing land	6 75%	2 25%	0	8 (100%)
Council-owned non-housing land	4 50%	4 50%	0	8 (100%)
Private and other publicly owned land	2 25%	6 75%	0	8 (100%)

Table 2: Qualitative Feedback – Site Search Parameters: Land Ownership Type

Do you think that “...” is an appropriate parameter/criteria? Please explain your response below.

Reason given for response	No. of Responses	YES	NO
Council-owned housing land	4	<ul style="list-style-type: none"> • It is land owned by the council. • Yes as owned by the council already 	<ul style="list-style-type: none"> • Need to clarify that this is land that doesn't currently have housing on it. • There is limited space in a central London borough. I do not believe land should be allocated by the local authority for use by travellers.
Council-owned non-housing land	4	<ul style="list-style-type: none"> • It is best to start with Council owned non-housing land if available and later consider further if necessary - this would be quicker and less expensive. 	<ul style="list-style-type: none"> • There is limited space in a central London borough. I do not believe land should be allocated by the local authority for use by travellers. • If the designation of other land is to be changed it should be for higher density housing to accommodate more housing units for more people to be housed. • Change of usage should be used for high density social housing and community infrastructure ie schools to cater for the majority of local population not for a low density house build which this would be.
Private and other publicly owned land	5	No reasons given.	<ul style="list-style-type: none"> • Someone owns the land. So you'd have to pay at least to compulsory purchase it. Resources are low enough as it is. • There is limited space in a London Boroughs. I do not believe land should be allocated in this way. • The council can not afford to buy land for low density housing. • Private land would be difficult to negotiate. • The council cannot afford local services so cannot spend money to buy land.

Table 3: Quantitative Feedback – Other Parameters

Do you think that the Council should.....?

Other Parameters	RESPONSE COUNT*			No. of Responses
	Yes	No	No response	
Focus on Council-owned property, as opposed to adjacent land in other ownerships that may be necessary to develop a Council asset	5 71.4%	2 28.6%	1	7 (87.5%)
Focus on a single site	3 37.5%	5 62.5%	0	8 (100%)
Consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and a combination of these types of sites	1 12.5%	7 87.5%	0	8 (100%)
Base a search for sites on an area of 400sqm per pitch	3 37.5%	5 62.5%	0	8 (100%)
Exclude geographical preferences	3 60%	2 40%	3	5 (62.5%)
Exclude potential sites located outside the Borough	2 28.6%	5 71.4%	1	7 (87.5%)

Table 4: Qualitative Feedback – Site Search Parameters: Land Ownership Type

Do you think that the Council should.....? Please explain your response below.

Reason given for response	RESPONSE COUNT	YES	NO
Focus on Council-owned property, as opposed to adjacent land in other ownerships that may be necessary to develop a Council asset	3	<ul style="list-style-type: none"> Let's not give more taxpayers' money to the private sector Non council land is not affordable 	<ul style="list-style-type: none"> There is limited space in a London Boroughs. I do not believe land should be allocated in this way.
Focus on a single site	6	<ul style="list-style-type: none"> Yes and that it should be at least 3 miles from any existing sites including sites located on other boroughs to ensure there is an even distribution across London. I say 'yes' preferably but each case should be considered individually depending on local opinion, facilities available and the stress on the existing community in the area with regard to people density, traffic etc. Yes and it should ensure it is not within 5 miles of an existing site which may be on borders of other boroughs sites they should be spread to ensure even distribution across London. 	<ul style="list-style-type: none"> Start with all sites that are suitable, then consult on those - not least with the gypsies and travellers who will be living there. If it means a site would be overcrowded then more than one site should be used. There is no reason to penalise people for their chosen lifestyle. 1 space is unsuitable let alone 6. There is limited space in a London Boroughs. I do not believe land should be allocated in this way.
Consider the full range of potential sites, including vacant open land, open land that is in use, vacant and occupied buildings and a combination of these types of sites	6	No reasons given.	<ul style="list-style-type: none"> Potential sites should be limited to council-owned land that is not currently used for anything else. As long as the land being considered is uncontaminated, safe, and away from sources of pollution there should be no restrictions. If the land is not suitable for habitation then it should not be considered. Additionally, if any sites that contain high levels of natural flora and fauna these should not be destroyed to make space if suitable brownfield space is available. There is limited space in a London Boroughs. I do not believe land should be allocated in this way. The council are looking at a small number of housing units. The land chosen

Reason given for response	RESPONSE COUNT	YES	NO
			<p>should not be land other people are currently using. Taking land used for other purposes will cause problems. No land within 3 miles of an existing site including sites in other boroughs should be considered.</p> <ul style="list-style-type: none"> It is very difficult to give a 'yes' or 'no' on this - definitely not occupied buildings. This is for a small amount of housing units council should not take land where it is currently being used. Site should not be located within 5 miles of a neighbouring boroughs site located on Lewisham borders.
Base a search for sites on an area of 400sqm per pitch	5	<ul style="list-style-type: none"> That is the recommendation but all 6 pitches should be grouped together and the site should not be located within 3 miles of an existing site including those located in other boroughs. That is the recommendation all 6 pitches should be site together and not within a five mile radius of existing border borough G&T sites. 	<ul style="list-style-type: none"> 400sqm per pitch is at the lowest end of the recommendations set out by the Net Density and Gypsy & Traveller Sites' working paper. It would be better for those who live on the site if the council took an average of the two limits and go with that instead. $(400 + 714 / 2 = 557\text{sqm per pitch})$ There is limited space in a London Boroughs. I do not believe land should be allocated in this way. I say 'No' because size would depend on what was appropriate according to the site under consideration -proximity to nearby housing, amenities etc,
Exclude geographical preferences	4	<ul style="list-style-type: none"> As it has been noted, no geographical preferences have been identified. As such, no area should be excluded from the search, including more affluent areas of the borough. There is limited space in a London Boroughs. I do not believe land should be allocated in this way 	<ul style="list-style-type: none"> As long as it is not within 5 miles radius of another G&T site across border of neighbouring borough

Reason given for response	RESPONSE COUNT	YES	NO
Exclude potential sites located outside the Borough	7	<ul style="list-style-type: none"> LBL is responsible for its part in finding suitable sites for LBL travellers. LBL should not encroach on sites other boroughs may wish to use to fulfill their commitments. 	<ul style="list-style-type: none"> It would be much better to have sites outside Lewisham. Lewisham needs the land for Council housing. Many councils are having to house people away from their borough; the nature of defining yourself as 'traveller' or 'gypsy' does mean 'not rooted in one place' There is limited space in a London Boroughs. I do not believe land should be allocated in this way. If the site must be located somewhere it should be located somewhere in the green belt where there is lots more space. Sites should be at least 3 miles apart both within the Borough and in relation to sites beyond Lewisham. As long as the site is not within 5 mile radius of a neighbouring boroughs G&T provision for even distribution we should work with other boroughs to ensure this is a plan.

Table 4: Other Comments

These are comments where there was 'no response' to the Yes/No question but the explanation field had been completed.

Exclude geographical preferences

- No site should be located within 3 miles of an existing including sites located in another borough site to ensure an even spread of sites across London.

Exclude potential sites located outside the Borough

- As long as the sites are not located within 3 miles of an existing site including sites located in another borough.

Table 5: Quantitative Feedback – Site Selection Criteria

Do you support Site Selection Criteria [...] as currently proposed? (Please refer to Table 5.1 of the Consultation Report.) Please explain your response below.

Site Selection Criteria	RESPONSE COUNT*			No. of Responses
	Yes	No	No response	
1. Effective and efficient use of public assets.	3 37.5%	5 62.5%	0	100%
2. Reasonable access to local shops, services and community facilities in particular schools and health services.	1 16.7%%	5 83.3%	2	6 (75%)
3. Safe and reasonably convenient access to the road network.	4 57.1%	3 42.9%	1	7 (87.5%)
4. Capable of satisfactory provision for parking, turning, service and emergency vehicles.	5 71.4%	2 28.6%	1	7 (87.5%)
5. Mixed residential and business use opportunities.	4 66.7%	2 33.3%	2	6 (75%)
6. Supply of essential services such as water, sewerage and drainage and waste disposal.	6 85.7%	1 14.3%	1	7 (87.5%)
7. Scope for healthy lifestyles and integration.	4 66.7%	2 33.3%	2	6 (75%)
8. Local environmental quality.	6 85.7%	1 14.3%	1	7 (87.5%)
9. Spatial planning & development management considerations.	1 20%	4 80%	3	5 (62.5%)
10. Deliverability.	2 28.6%	5 71.4%	1	7 (87.5%)

Table 6: Qualitative Feedback – Site Selection Criteria

Do you support Site Selection Criteria [...] as currently proposed? (Please refer to Table 5.1 of the Consultation Report.) Please explain your response below.

Reason given for response	RESPONSE COUNT	YES	NO
1. Effective and efficient use of public assets.	5	<ul style="list-style-type: none"> Yes, as long as all areas are considered and travellers not marginalised to areas that already contain large numbers of people living in poverty. To do this will only increase social tensions and possibly result in higher costs of policing and other social services. 	<ul style="list-style-type: none"> There is limited space in a London Boroughs. I do not believe land should be allocated in this way. It should be specified that no site should be located within 3 miles of an existing site including sites located in another borough. This is to ensure an even spread of sites across London and not concentrated in one area and neighbourhood. I'm concerned that careful consideration is given to each individual possible site and that there be a 3 mile separation so that assimilation will be harmonious and facilities adequate for all. Sites to be distributed fairly and should not be located within 5 miles of an existing site on border of neighbouring boroughs
2. Reasonable access to local shops, services and community facilities in particular schools and health services.	5 (also see other comments below)	No reasons given.	<ul style="list-style-type: none"> The distances from shops and health facilities is too far. For anyone with mobility issues this could prove to be very limiting to their lifestyle. Under 800m would be best. I am sure there are lots of places in Lewisham that don't meet this. It's a nice to have, not a necessity. Why is locating a traveller camp near to public transport important? Travelers have their own mode of transport. Sites should be evenly distributed and not located within 5 miles of neighbouring boroughs G&T sites
3. Safe and reasonably convenient access to the road network.	4	<ul style="list-style-type: none"> Yes, as long as a clearance height of 3.7m is suitable for the majority of traveller vehicles. As long as sites should not be located within a 5 mile radius of a neighbouring boroughs site. 	<ul style="list-style-type: none"> As with 2 - it's a nice to have not a necessity There is limited space in a London Boroughs. I do not believe land should be allocated in this way.

Reason given for response	RESPONSE COUNT	YES	NO
4. Capable of satisfactory provision for parking, turning, service and emergency vehicles.	2	<ul style="list-style-type: none"> As long as site not be located within 5 mile radius of neighbouring borough G&T site. 	<ul style="list-style-type: none"> There is limited space in a London Boroughs. I do not believe land should be allocated in this way.
5. Mixed residential and business use opportunities.	3 (also see other comments below)	<ul style="list-style-type: none"> But site should not be located within 5 mile radius of neighbouring G&T site. 	<ul style="list-style-type: none"> Given the client group, unless the business use is tailored for them, it is going to be difficult to market and difficult to get people to work there.
6. Supply of essential services such as water, sewerage and drainage and waste disposal.	5	<ul style="list-style-type: none"> Absolutely Yes, all essential services must be provided however the term 'Average' is very vague. 'Acceptable' would be better. Water and Sewage should be supplied to a camp but the camp should not be located in a built up area like Lewisham. But site should not be located within 5 mile radius of existing neighbouring borough G&T site. 	<ul style="list-style-type: none"> It should be specified that no site should be located within 3 miles of an existing site including sites located in another borough. This will support local integration.
7. Scope for healthy lifestyles and integration.	4	<ul style="list-style-type: none"> Yes, though provision for site maintenance must be factored in. It should not be up to the residents alone to maintain this site themselves. Provision can be made for healthy lifestyles but a camp should not be located in a built up area like Lewisham. Site should not be located within 5 miles of neighbouring borough G&T site. 	<ul style="list-style-type: none"> Nice to have not essential.
8. Local environmental quality.	3	<ul style="list-style-type: none"> This is the sort of basic level we should all enjoy. The camp should not be located in a built up area like Lewisham but any camp that does get built should adhere to local 	

Reason given for response	RESPONSE COUNT	YES	NO
		<p>environmental quality.</p> <ul style="list-style-type: none"> Site should not be located within 5 mile radius of neighbouring boroughs site. 	
9. Spatial planning & development management considerations.	4 (also see other comments below)	No reasons given.	<ul style="list-style-type: none"> The camp should not be located in a built up area like Lewisham. It should be specified that no site should be located within 3 miles of an existing site including sites located in another borough. No site should be within 5 miles of neighbouring boroughs G&T site.
10. Deliverability.	5	<ul style="list-style-type: none"> A suitable location for development must include the possibility of more affluent areas being considered also. 	<ul style="list-style-type: none"> This may eliminate some sites that 'would do'. The camp should not be located in a built up area like Lewisham. It should be specified that no site should be located within 3 miles of an existing site including sites located in another borough. Sites should not be located within 5 miles of another neighbouring boroughs site.

Table 6: Other Comments:

These are comments where there was 'no response' to the Yes/No question but the explanation field had been completed.

Criteria 2

- It should be specified that no site should be located within 3 miles of an existing site including sites located in another borough

Criteria 5

- This really is inappropriate. How can you locate a traveller camp in the middle of a residential / business opportunity area?

Criteria 9

- Have absolutely no idea what you mean.