

Gypsy and Traveller Site Assessment Methodology

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1.0 Introduction

1.1 This document sets out the proposed methodology to be used to assess sites put forward for potential gypsy and traveller development. It will form part of the evidence base for the preparation of a Gypsy and Traveller Development Plan Document (DPD). It will help identify potential sites that may be deliverable and developable for new gypsy and traveller development up to 2033. This is a very similar process to the Strategic Housing Land Availability Assessment for housing.

2.0 About the Gypsy and Traveller Site Assessment (GTSA)

2.1 The GTSA has two purposes, first, it identifies suitable sites with potential for gypsy and traveller pitches, investigates their housing (and possibly employment) potential and assesses whether they are likely to be developed (i.e. assessing suitability, availability and achievability). Second, the GTSA assesses the five year supply of deliverable sites, a key requirement under national policy.

2.2 The assessment of sites for gypsy and traveller use through the GTSA process and the identification of potential sites in the GTSA report does not indicate that the sites will be allocated for development within a Local Plan or DPD or be granted planning permission. Instead it forms part of the evidence base to inform plan-making. Any sites deemed suitable, available and achievable by the GTSA process will still be subject to public consultation, sustainability appraisal and independent examination if they are taken forward through the Local Plan or DPD process. However, the GTSA may be a material consideration in the determination of planning proposals.

3.0 National policy and guidance

3.1 The National Planning Policy Framework (NPPF) requires local planning authorities to meet the needs for all types of housing and the needs of all groups in the community. Planning Policy for Travellers (PPT) states that:

“ 3. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. “

It goes on to state that:

“

8. Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in

their area, working collaboratively with neighbouring local planning authorities.

9. Local planning authorities should, in producing their Local Plan:
 - identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
 - identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
 - consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
 - relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
 - protect local amenity and environment"

and

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

3.2 Preparation of a Gypsy and Traveller Accommodation Assessment followed by a Gypsy and Traveller Site Assessment enables us to meet these objectives. National policy also advises that local authorities should work together, to ensure a joined-up and robust approach. Since the timescales for the preparation of development plans by local authorities differs, completion of a single GTSA covering all partners is not

practicable, however the accommodation assessment was commissioned by a partnership of Devon authorities in partnership, to ensure a common approach.

4.0 The Assessment Panel

4.1 Integral to the preparation of this document (in common with the Strategic Housing Land Availability Assessment) is a 'panel' of key stakeholders who have a recognised interest in the development of land for housing. Membership of the panel is representative of the broad cross-section of the housing building industry, including housebuilders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations. As the sites under consideration are specifically intended to house gypsies and travellers it is important that their interests are represented on the panel and organisations with particular knowledge of the subject will be asked to join.

4.2 The panel operates in an advisory capacity, making use of their specialist knowledge. The District Council will identify whether sites are 'available' and 'suitable', and the panel will then advise on 'achievability'. Panel members such as the Environment Agency and Natural England will also advise further on suitability of sites if required. The expertise and knowledge of panel members is important in helping the District Council to identify deliverable and developable sites which can contribute to the supply of housing. Panel members are not precluded from commenting on sites they have an interest in, however, they are required to declare an interest if they have a site under consideration. Further details on how the panel operates and its constitution and terms of reference are available on the website.

5.0 Role of the District Council- Assessing 'suitability' and 'availability'

5.1 A wide variety of sources will be used to identify potential sites. An exhaustive list of potential sources for identifying sites to house the settled community is set out in paragraphs 012, 037 and 038 of the NPPG, and this will be used as the basis for this exercise.

- One of the principal methods for identifying such sites will be a public consultation exercise, undertaken by the District Council. The 'call for sites' will be targeted at landowners, agents, developers and town and parish councils to identify sites that are not currently within the planning process.

- If there are any other known sites, such as existing allocations, current/lapsed planning permissions, draft allocations etc., they will also be included.
- In addition, a press release will be made available to draw attention to the process.

Minimum site size for inclusion

5.2 The Government guidance (“Designing Gypsy and Traveller Sites- a good practice guide”) suggests that typical pitches should be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers), drying space for clothes, a lockable shed, parking space for two vehicles and a small garden. To ensure that pitches are of an adequate size, a minimum site size threshold of 500m² will be set. This size pitch does not include specific ‘work space’, for example for the storage of scrap metal/materials, machinery and equipment, or for the keeping of animals. Where gypsies or travellers have a specific cultural need for grazing space (where they use horse drawn wagons, for example, as part of their travelling lifestyle) an individual case will need to be made for larger pitches to the District Council, who will endeavour to incorporate stabling within pitches. As horses usually need a minimum acre of grazing land per animal however, it is unlikely to be possible to accommodate this on Council owned sites, in which case prospective residents will need to seek local grazing land privately.

Visiting sites

5.3 Ideally, all sites that meet the inclusion criteria should be visited. However, this may not be possible given the resources available, particularly if a significant number of sites are identified. Sites that have planning permission or have previously been assessed as part of Local Plan work may not need a visit, if the necessary information can be obtained from planning and building control records.

5.4 Site surveys are to be undertaken by officers. Panel members may also undertake site visits in order to provide detailed advice on the potential deliverability and developability of sites. A pro forma (based on the Strategic Housing Land Availability Assessment form) to record site suitability will be used by all partner authorities.

Estimating pitch potential for each site

5.5 The whole area of a proposed site may not all be developable for gypsy and traveller use. This is because the area for pitch development on larger sites may be reduced through the provision of access roads, strategic open space or landscaping. The development potential of individual sites may also be affected by constraints such as biodiversity conservation, protected trees or the presence of heritage assets. On the basis that the overall number of pitches needed is relatively low, and layouts

can be flexible to reflect individual site characteristics, the issue of realistic developable site area will be looked at on a case by case basis, rather than applying standardised 'gross to net ratios' which are common with housing for the settled population.

Assessing suitability for housing

5.6 A site is suitable for development if it offers an appropriate location for development and would contribute to the creation of sustainable, mixed communities with access to services and facilities.

A two stage approach is applied to determining whether potential sites are in suitable locations for gypsy and traveller housing development. The following locations will be considered unsuitable and removed from the process under Stage A:

Stage A assessment criteria	
Locations considered to be unsuitable for Gypsy and traveller housing development	Justification
Site and potential scale of development for gypsy and traveller housing does not accord with strategically appropriate locations through: <ul style="list-style-type: none"> • The Development Plan (e.g. saved policies, published, submitted or adopted Local Plan), or • National guidance on the sustainable location of development 	Development in locations unrelated to settlements defined through existing/emerging development plan policies may not contribute towards the creation of sustainable, mixed communities.
Where the site will adversely impact upon the following designated sites of biodiversity or geodiversity importance: <ul style="list-style-type: none"> • Site of Special Scientific Interest (SSSI) • Special Area of Conservation (SAC) • Ramsar site (wetlands of international importance) • Special Protection Area (SPA) 	National policy advises against development that would have an adverse impact on national and internationally important nature and geology conservation interests.
Flood risk zone 3	Comprises land within the functional floodplain or land at high probability of flooding.

5.7 Sites that have been deemed suitable under Stage A will then be considered against further criteria within Stage B. The site criteria take into account policy restrictions, physical problems or limitations, potential impacts, and the environmental conditions which would be experienced by prospective residents. While the District Council will conduct the initial assessments of site suitability, specialist advice, for

instance from the Environment Agency and Natural England, may alter the local authority's conclusions regarding environmental and other impacts.

Stage B assessment criteria	
<p>Potential for impact on:</p> <ul style="list-style-type: none"> • Biodiversity, the historic, cultural and built environment • Landscape character • Mineral resources • Air quality • Water Source Protection Zones • Open space and recreation facilities • Employment land 	<p>Other considerations:</p> <ul style="list-style-type: none"> • Access to public transport, services and facilities • Amenity of residents • Access to public transport, services and facilities • Highway access, pedestrian and cycle links • Land status • Constraints to delivery, including flood risk • Infrastructure capacity • Compatibility with existing and/or proposed surrounding uses

5.8 Sites with planning permission for gypsy and traveller pitches will be regarded as suitable unless there have been subsequent changes in circumstances which may affect this position. Where access to a site relies upon a third party, the landowner will need to confirm it is available and deliverable for this purpose (and will usually be requested to submit it as a GTSA site for assessment by the panel).

Assessing availability for gypsy and traveller use

5.9 Sites brought forward during a call for sites, including those nominated by any landowner/agent/developer or the planning authority, need to be confirmed as available by the landowner/agent via a Gypsy and Traveller Site Proforma. Sites with planning permission subject to the completion of a S106 agreement will be assumed to be available unless the local authority has knowledge to the contrary or following advice of the panel. Further investigation may also identify legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners which could affect genuine availability.

Determining gypsy and traveller potential of windfall sites

5.10 The District Council may make an allowance for windfall sites (based on the rate at which sites have come forward during the last 10 years) if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, given the small numbers involved and the historical lack of consistency with which they have come forward, the Council's preference is to allocate sites.

6.0 Role of the Panel – assessing ‘achievability’

6.1 It is primarily at this stage that the panel provide their input, this forming a significant element of the overall GTSA process. It is the role of the panel to advise on the ‘achievability’ of each site based on the information supplied by the local authority collated through the earlier stages of the process. The local authority should inform the panel whether there are known to be abnormal costs relating to infrastructure, and what requirements may exist for the provision of affordable housing, open space and other community facilities or biodiversity considerations to make development acceptable in sustainability terms. The panel will advise whether a potential site can be determined achievable by there being a reasonable prospect that gypsy and traveller accommodation will be developed on the site at a particular time. The panel may also wish to adjust the housing yield for sites due to constraints or advise on the likely number of dwellings that can be accommodated. The panel and local authority will work together to consider ways to overcome constraints where they have been identified as preventing a site from being currently deliverable or developable.

7.0 Calculating delivery rates of gypsy and traveller sites

7.1 The Gypsy and Traveller Accommodation Assessment establishes that 37 residential pitches and 23 bricks and mortar houses are required in the twenty years from 2014 to 2034. The bricks and mortar houses will be provided as part of the Districts new housing supply. The new pitches will be provided in accordance with the table below. As the numbers are so modest (approximately 1 per year after the first 5 years) and can be accommodated on a small number of sites it is not considered necessary to ‘model’ the commencement and build out rate of sites.

	Base Numbers 2014	Additional need 2014-2019	Additional need 2019-2024	Additional need 2024-2029	Additional need 2029-2034	Additional need 2014-2034	Numbers as at 2034
Residential Pitches	36	22	5	5	5	37	73
Bricks and Mortar	72	5	6	6	6	23	95

8.0 The Gypsy and Traveller Site Assessment Report

8.1 The District Council will produce a report upon completion of the assessment which will form part of the local evidence base. The report will include:

- A detailed assessment for each potential site, cross referenced to a map / plan showing the location and boundary of the site.
- A spreadsheet listing all potential sites presenting the potential commencement of gypsy and traveller development and build out on an annual basis, grouped in five year tranches. Depending on the circumstances of the sites which comes forward an indicative trajectory showing potential delivery may be necessary.
- Whether a windfall allowance has been included

8.2 Paragraph 9 of the Planning Policy for Travellers requires local authorities to identify and update annually a supply of specific deliverable sites for five years worth of their gypsy and traveller housing requirements. The GTSA will be used to review and update the 5 year supply, which provides a 5 year look forward from April in the following year (i.e. years 1-5 of the GTSA delivery period).

9.0 Reviewing the assessment

9.1 The GTSA will need to be reviewed in whole, or in part, on a regular basis. Dependent on circumstances and resources available, this may take place annually, 5 yearly or after another period if monitoring indicates this would be more appropriate. A full GTSA review may require a new accommodation/needs assessment and/or a new call for sites, whilst a part review will only require an updating of the GTSA report.

9.2 Both a full or part review of the assessment will provide an update on the availability and achievability of sites in the GTSA, including an evaluation of any changes in circumstances.

The following information should be recorded:

- Whether sites have been completed or are under construction
- Whether sites are the subject of planning applications or permissions
- Progress which has been made on removing constraints to development and the achievability of sites
- The identification of any new constraints
- Whether any previously unidentified sites have come forward that were not included in the GTSA but meet the minimum site size threshold (i.e. 500 square metres)

9.3 It may be necessary to allocate new sites for gypsy and traveller housing in order to maintain a five year supply of specific deliverable sites. To keep the land supply up to date, and inform any reviews of a Local Plan, a full GTSA review will need to be undertaken repeating the call for sites and a more comprehensive survey.

9.4 If the assessment or subsequent reviews highlight that insufficient sites have been identified to meet development plan targets, a 'broad locations' approach can be taken, which will locate general directions of growth for new development. If this approach is taken it will need to be justified in the GTSA report and any estimates of potential housing supply will need to have regard to the nature and scale of opportunities within the area identified and market conditions.

10.0 List of Documents

10.1 The following documents are available to download from the East Devon District Council website (or upon request in paper format)

<http://eastdevon.gov.uk/planning/planning-policy/emerging-plans-and-policies/gypsy-and-travellers/> :

- Potential Gypsy and Traveller Site Pro Forma (New Sites)
- Potential gypsy and Traveller Site Pro Forma (Availability Review)
- Site Suitability Appraisal Pro Forma
- GTSA Panel constitution and terms of reference

The following will be available at appropriate points in the process:

- Spreadsheet for presentation of potential sites
- GTSA Report

10.1 Copies of the documentation are available on request from:

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Sidmouth

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