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For and on behalf of  
**Lambeth Council**

**GYPSY AND TRAVELLER LAND SUPPLY ASSESSMENT STUDY  
FINAL REPORT**

**Lambeth Council**

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## 1.0 INTRODUCTION AND BACKGROUND

### Introduction

- 1.1 Lambeth Council (the Council) appointed DLP Planning (DLP) to provide advice on the delivery of Gypsy and Traveller pitches in Lambeth. The study sought to identify potential sites that could be considered to meet the accommodation needs identified in Lambeth's Borough wide Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA 2014) undertaken by Opinion Research Service (ORS). The study is currently in the process of being updated.
- 1.2 DLP's objective is to provide evidence to support the Council in assessing the potential supply of land to meet identified Gypsy and Traveller needs in the borough.
- 1.3 Gypsies and Travellers have lived in Britain for at least 500 years and probably longer. For the purposes of the planning system, Gypsies and Travellers means:
- “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.”* (Planning Policy for Traveller Sites, CLG, August 2015).
- 1.4 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.
- 1.5 Gypsies and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:
- Romany Gypsies;
  - Irish Travellers; and
  - New Travellers.
- 1.6 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under equalities legislation.

- 1.7 Travelling Showpeople have traditionally been involved in holding fairs and circuses for many hundreds of years. For the purposes of the planning system, Travelling Showpeople means:

*“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependent’s more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.”* (Planning Policy for Traveller Sites, CLG, August 2015).

- 1.8 The Government published a new policy statement ‘Planning Policy for Traveller Sites’ in 2012 (Updated August 2015), replacing Circulars 01/2006 and 04/2007 to address future accommodation needs of Gypsies, Travellers and Travelling Showpeople because the previous planning policy arrangements had failed to deliver adequate sites to meet identified needs over the previous 10 years.

- 1.9 Significantly the update to PPTS in August 2015, has changed the definition of travellers, which, as acknowledged in the brief requires the Council to update the GTAA to reflect this change and ensure that a robust assessment of needs is in place.

- 1.10 Critically local planning authorities are currently required to identify and allocate sufficient sites to meet the needs of these groups within their local plans for at least the first 5 years. This means that when identifying and allocating sites consideration is required on whether sites are genuinely available and suitable. The distinction between developable and deliverable sites is particularly important to ensure the production of robust development plan documents.

- 1.11 Paragraph 47 of the NPPF defines the terms ‘deliverable’ and ‘developable’ as;

*“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”.*

*“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”.*

## 2.0 Existing Sites

### Introduction

- 2.1 'Planning Policy for Traveller Sites' (CLG, August 2015) states that the overarching aim of Government 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.” (para 3).
- 2.2 The above document includes some significant changes to the way in which the site needs of Gypsies, Travellers and Travelling Showpeople are planned for. The most significant change has been the removal of regional targets and the replacement with a new system of locally generated targets. Under this, local planning authorities are required to use a robust evidence base to establish accommodation needs, including to;
- Set pitch targets to address the likely permanent and transit site accommodation needs of Travellers in their area;
  - Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
  - Identify a supply of specific developable sites or broad locations for years six to ten and where possible for years 11-15; and
  - Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward.
- 2.3 In 2014 the Council commissioned consultants ORS, to carry out an Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople across the Borough; the objective of that assessment being to quantify the number of Gypsy and Traveller pitches required to meet identified needs to 2031. N.B. This assessment is currently in the process of being updated and when completed will provide Lambeth Council with the evidence to address the first PPTS requirement set out above i.e. pitch targets.
- 2.4 This Gypsy and Travellers Land Supply Assessment Study seeks to identify and assess potential sites which will be suitable to meet the future needs identified in the Accommodation Needs Assessment.

## Existing Sites

### *Gypsies and Travellers*

- 2.5 Residential Gypsy and Traveller sites provide residents with a permanent base from which to travel and can be privately owned, publicly rented (for affordable pitches), or privately rented from other Gypsies and Travellers. The size and the amount of facilities available on these sites varies between sites.
- 2.6 Sites are made up of a number of caravan pitches and associated facilities. Although there is no national definition of what size a pitch should be, a general guide contained in *Designing Gypsy and Traveller Sites*<sup>1</sup> states that “an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan... drying space for clothes, a lockable shed...parking space for two vehicles and a small garden” (para 7.12). On average, usage is approximately 1.7 caravans per pitch.
- 2.7 Residential sites provide a permanent home and the amount of facilities on site varies mainly between public and private sites. Public sites will generally have amenity blocks and sometimes play areas and communal spaces. Private site facilities vary enormously depending on the requirements of the residents.
- 2.8 Within Lambeth there is currently one established Gypsy and Traveller site, located in Streatham Vale, providing 16 pitches. The site is publically owned and managed by Lambeth Council.

**Table 1 Existing Gypsy and Traveller Sites in Lambeth**

Ref	Site Name	Planning Status
L001	Streatham Vale (Lonesome Way)	Public authorised site

### *Travelling Showpeople*

- 2.9 There are currently no Travelling Showpeople sites in Lambeth. The 2014 GTAA and updated evidence suggest that there is also no need or current requirement in relation to Travelling show people plots. Therefore, this site assessment study has focused solely of the identification of suitable gypsy and traveller sites.

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<sup>1</sup> Communities and Local Government (2008) *Designing Gypsy and Traveller Sites Good Practice Guide – Withdrawn* September 2015

## 3.0 Methodology

### Introduction

- 3.1 This section sets out the methodology DLP Planning have followed to complete the Lambeth Council Gypsy and Traveller Land Supply Assessment Study. DLP Planning have developed a methodology that is driven by national guidance and are confident it will provide what is needed in an efficient fashion. The draft methodology was available for comment to those involved in providing comments on sites for the study between 16th March 2016 and 4th April 2016 and comments received were fully considered before the methodology was finalised and applied to potential sites.

### Review of Sources of Sites

- 3.2 Lambeth Council gathered sites together for the **Part 1a** Assessment. This involved the consideration of a number of sources of sites to ensure that all potential sources were considered in a comprehensive manner. This also allowed for an initial sieving to remove sites with no availability early in the process. The review of site sources considered the following:

- Authorised Sites - Existing Gypsy, Traveller and Travelling Showpeople sites with full, temporary or personal consents or certificates of lawful use (there is only one site in Lambeth);
- Unauthorised Sites – Any existing unauthorised and tolerated sites and encampments.
- Call for Sites – Any sites submitted for Gypsy and Traveller uses during the previous Local Plan Call for Sites (November and December 2015); none were submitted for Gypsy and Traveller use.
- Lambeth Council Owned Land – Lambeth Council undertook a review of its public land holdings to identify potential sites for development. An initial sieve was then undertaken to remove all unavailable or incidental public land such as; existing housing, active commercial and community uses, public buildings, public open space, active waste facilities and highway verges.
- Surplus Public Sector Land – the Greater London Authority’s recently established London Land Commission holds a database of other public bodies with public land holdings in the capital, e.g. Greater London Authority, Transport for London, Network Rail and NHS Estates. Lambeth Council has used this source to identify potential sites in its area for this study. Again an initial sieving exercise removed all sites identified on the database as in active use and incidental public land such

as public buildings. Public open space, active waste facilities and highway verges were also excluded.

- Sites submitted for Housing (SHLAA) – the GLA SHLAA 2013 includes identified large sites of at least 0.25 hectares in area. These were systematically assessed for housing in 2013 and the Council has updated this data in 2016. A number of these sites were excluded from the SHLAA or classified as ‘low probability’ on the basis that they are in active use for non-housing uses and/or they have been recently developed and are not expected to come forward for redevelopment in the next 15 years. All the remaining SHLAA large sites have been considered for this study. An initial sift excluded sites with current planning permission, with site allocations in the Local Plan 2015, and/or which are the subject of active and advanced discussions or master-planning work. All the remaining sites have been included in the long list for this study, along with sites submitted through the 2015 call for sites for housing, although not specifically for gypsy and traveller use. Landowners were then contacted to determine availability.
- Employment Land Review (ELR) – Lambeth Council reassessed its safeguarded Key Industrial and Business Areas (KIBAs) during 2015/16. This assessment identified a small number of vacant sites within KIBAs, which the council considers are still needed, suitable and developable for employment and waste uses. It is not proposing to release these for housing in the forthcoming partial Local Plan Review. However, these sites were included in the long list for this gypsy and traveller land supply assessment to ensure that all possible options were explored. Landowners were contacted to determine availability.

- 3.3 The output of the review was a list of sites provided to DLP Planning for consideration in the assessment.

#### **Identifying Criteria for Site Assessment**

- 3.4 Based upon a review of all available policy, guidance, identified site need from the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) and physical constraints, DLP Planning identified a list of site criteria for discussion and agreement with Lambeth Council. DLP Planning used the criteria to assess potential sites. The criteria could also be used to inform future Council policy and could subsequently be used to determine planning applications.

- 3.5 Account was taken of national policy, as contained within Planning Policy for Traveller Sites (CLG, 2015) and existing local policy, as contained within the adopted Local Plan (2015).
- 3.6 Having regard to the overall policy framework, the approach to identifying appropriate site selection criteria has been to build upon the National Planning Policy Framework:
- Is the site available?
  - Is the site suitable? and
  - Is the site developable? e.g. viable and deliverable?
- 3.7 A key consideration, based upon national policy, has been that criteria should be “fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community” (Planning Policy for Traveller Sites, 2015, paragraph 11). Criteria should be clear, transparent and unambiguous. Many previous studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward.
- 3.8 DLP Planning have taken account of various criteria including the following sources:
- National Planning Policy Framework, 2012 and National Planning Policy Guidance, 2014;
  - ‘Planning Policy for Traveller Sites’, 2015;
  - Adopted Local Plan Policies 2015;
  - ‘Designing Gypsy and Traveller Sites’, 2008 (now withdrawn).
- 3.9 The site criteria proposed was applied in two parts, the **Part 1a Assessment** is desk based and involved the consideration and application of broad suitability criteria, including absolute constraints and an initial investigation of likely availability.
- 3.10 The objective of the **Part 1a Assessment** was to sieve out sites which are very likely to be rejected on suitability grounds due to major constraints such as; being within international environmental designations, within the boundaries of scheduled ancient monuments or within flood zone 3a/b (given the vulnerable nature of gypsy and traveller pitches).
- 3.11 Availability is a key criteria and discussions, regarding the future availability of the sites to accommodate additional pitches, informed the **Part 1a Assessment**. The output from Part 1a was an ‘Assessment Matrix’ of sites using a traffic light approach to identifying where sites did not satisfy criteria in red, where criteria may be capable of being

satisfied, but require further investigation in yellow and where criteria are satisfied in green. Table 3.1 overleaf sets out the **Part 1a** Assessment criteria.

**Table 3.1: Part 1a Assessment (Desk Based) Criteria**

Criteria	Designation/Issue	Red (Site does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
<b>Flood Risk</b>	Environment Agency Indicative Flood Mapping and SFRA Area at Risk of Flooding	The site is within flood zone 3a and/or 3b and is not suitable for Gypsy and Traveller use.	The site is within flood zones 2 requiring further investigation (and application of policy tests).	The site is not affected by identified areas of indicative flooding or is located in flood zone 1.
<b>Environmental Designations</b>	Special Protection Area Special Area of Conservation RAMSAR Site Site of Special Scientific Interest National Nature Reserve Site of Nature Conservation Importance	The site within an international or national environmental designation.	The site is within the buffer or close proximity of an international or national designation and could therefore have a negative impact.  The site is covered by a local designation or is within close proximity and could therefore have a negative impact.	The site is not within an international, national or local environmental designation or within its buffer.
<b>Potentially Contamination or Unstable Land Issues</b>	Potentially Land contamination or unstable land issues	The site is located within or adjacent to, a landfill site or the land is unstable and has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There are no known contamination or unstable land issues.
<b>Noise Issues</b>	Noise issues relating to existing land uses or transport corridors	n/a	The site is located adjacent to noisy land uses, which requires further investigation.	There are no noisy adjacent land uses and therefore no noise impact on the site.

**Table 3.1: Part 1a Assessment (Desk Based) Criteria**

Criteria	Designation/Issue	Red (Site does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
<b>Residential Amenity</b>	Location of site in relation to existing dwellings and bad neighbour uses	n/a	The site is adjacent to existing dwellings or bad neighbour uses and requires further investigation.	There are no adjacent dwellings or bad neighbour uses and therefore no impact on residential amenity.
<b>Historic Assets</b>	Scheduled Monuments Registered Parks and Gardens Battlefields Conservation Areas Listed Buildings Non designated heritage assets	The site is within a Scheduled Monument or Registered Park and Garden.	The site is within or adjacent to a Conservation Area, an Archaeological Priority Area or affects the setting of listed buildings or other heritage asset'.	The site is not within or adjacent to any heritage asset.
<b>Availability and Capacity</b>	Submitted sites, public land ownership, etc.	The owner has confirmed that the site is not available, nor is it likely to be available in the future and/or the capacity of the site is already above the recommended size (15 pitches) set out in government guidance.	Site availability is unknown and requires further investigation. Potential for Land Registry searches (if required).  Public owned sites deemed potentially available for Gypsy and Traveller use unless informed otherwise.	There is evidence that the landowner is willing to sell or develop the site for Gypsy and Traveller use.

- 3.12 The **Part 1b** Assessment (Site Survey) involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues was also investigated. All sites not rejected in the **Part 1a** Assessment were visited by the consultant team.
- 3.13 Suitability, availability and achievability of these sites was assessed in detail.
- In terms of **suitability** each site was assessed against the agreed criteria which are proposed and broadly grouped into policy requirements, physical constraints and potential impacts.
  - In terms of **availability** landowners were contacted to identify whether sites will be made available and any potential legal or ownership constraints.
  - In terms of **achievability** potential abnormal site constraints, needing to be rectified because they may affect viability were identified and any potential alternative uses likely to affect deliverability.
- 3.14 The **Part 1b** Assessment criteria is set out in Table 3.2 overleaf and formed the basis of the study method agreed with the Council. All rejected sites from both **Part 1a** and **Part 1b** were included in a 'rejected sites' list within the report appendices, setting out clear reasons for rejection.

Table 3.2: Part 1b Assessment (Site Survey) Criteria				
Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	<p>Site promoted by landowners, agents and/or the travelling community</p> <p>Public land confirmed as available</p>	<p>Site not available for Gypsy and Traveller use.</p> <p>There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved.</p> <p>Public land has been identified in another plan / strategy for another use.</p>	<p>There continues to be doubt over whether the site is genuinely available for Gypsy and Traveller use after further investigations.</p>	<p>There is evidence that the landowner is willing to sell and/or a developer is interested in developing within the timeframe of the GTAA.</p> <p>There are no known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the GTAA.</p> <p>Public site is not identified in a plan or strategy for another use.</p>
Contamination and unstable land	<p>Potentially Contaminated Land</p> <p>Unstable Land</p>	<p>Contains an area of unstable or contaminated land that is likely to undermine the site's suitability and achievability.</p>	<p>Could contain unstable or contaminated land that should be subject to further investigation.</p>	<p>Not located on unstable land.</p> <p>Not located on contaminated land.</p>
Topography	<p>Topography</p>	<p>Steep slopes which make the site unsuitable and/or unachievable.</p>	<p>Sloping or undulating land which may require works to achieve a suitable development.</p>	<p>Level or gently sloping site.</p>

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
<b>Site access and safety</b>	Site access for caravans between 15 to 25 metres in length  Proximity to major roads/strategic road network	Poor access and/or road of poor standard.  Likely to be subject to safety issues from surrounding uses incapable of mitigation	Access poor but capable of being improved.  Road of adequate or good standard.  Likely to be affected by safety issues but this is capable of mitigation.	Adequate or good access off adequate or good standard of road.  Not affected by safety issues.
<b>Accessibility to facilities</b>	<i>Access to facilities:</i> GP Surgery Primary School Shop  <i>Access to public transport:</i> Bus stop or route Train station	Actual distances to facilities can be measured to identify the relative sustainability of sites. If the Council identifies a pool of sites, it could use accessibility criteria to select the most sustainable site options to meet its defined needs in the first five years.		

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Biodiversity / Protected Species / Important Hedgerow	Impact on biodiversity action plan habitats or known protected species	Significant effect and unacceptable impact of site upon ecology or protected species or habitats not capable of mitigation where there is no overriding public interest.	Impact capable of mitigation. Potential cumulative impact with other identified sites.	No significant effect or unacceptable impact on ecology, protected species or habitats.
	Local Nature Reserve Geological Conservation Review Site Sites of Importance for Nature Conservation Agricultural Land Quality			
Heritage Assets	Scheduled Monuments	Development is likely to harm to the significance of a designated heritage asset, including its setting.	Development is likely to cause some harm to the significance of a heritage asset, including its setting, but this is likely to be able to be satisfactorily minimised/mitigated to such an extent to accord with the provisions of the NPPF.	Development is unlikely to harm the significance of any heritage asset or its setting.
	Registered Parks and Gardens Battlefields Conservation Areas Listed Buildings Non designated Heritage Assets			

Criteria	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
<b>Noise and Air Quality</b>	Noise or air pollution from adjacent uses e.g. road, rail and air transport	Likely to be adversely affected by noise or air pollution from adjacent uses leading to an unacceptable residential environment.	Likely to be affected by noise or air pollution but this is capable of mitigation.	Not affected by noise or air issues.
<b>Residential Amenity (Impact of site and adjoining uses on each other)</b>	Relationship with existing adjacent uses	Close proximity to existing adjacent uses e.g. residential properties where any potential impact (light, visual, noise, traffic) on adjoining uses is not reasonably capable of mitigation.	Close proximity to existing adjacent uses especially residential properties but any potential impact (light, visual, other disturbance) on adjoining uses is capable of mitigation.	Unlikely to adversely affect existing adjoining uses.
<b>Achievability</b>	Deliverable Viable	Site constraints or ownership issues that are unlikely to be capable of resolution without considerable expense.	Site constraints capable of being overcome but where extent and cost of mitigation are unclear at this stage.	In a location where housing development is not contrary to spatial policy.  No site constraints needing to be overcome.

### Site Reporting and Officer Consultation

- 3.15 Following the survey all acceptable **Part 1b** sites were sent to the Council for comments from relevant officers. Officers were asked to comment on whether Gypsy and Traveller development ‘in principle’, on each site, would have any implications relating to their area of expertise. This included whether there were any absolute constraints not identified in **Part 1a** or whether there were mitigation measures that needed to ensure sites are developable and deliverable in **Part 1b**. Site comments were sought from the following service areas:
- Transport planning;
  - Development Management;
  - Ecology;
  - Historic Environment and Urban Design; and
  - Environment Agency (for sites in flood Zones 2 and 1).
- 3.16 All **Part 1b** sites which were considered potentially suitable, available and achievable were subject to an initial broad assessment of the capacity of the site in terms of the number of pitches or plots which could be provided. This took account of:
- The size and shape of the site and character of the adjoining area, including average pitch / plot size assumptions;
  - availability in particular the view of the owner/occupier;
  - ‘Designing Gypsy and Traveller Sites’ guidance (CLG, 2008, now withdrawn); and
  - any relevant planning history.
- 3.17 This helped to determine the optimum size and configuration of pitches or plots on the site. It should be noted that DLP acknowledge the preference of both the settled and travelling community for smaller family sites, in general we do not recommend private sites of more than 15 pitches or public sites of more than 20 pitches, but do note that large successful sites exist across the Country and maybe an option for Local Authorities in certain circumstances. On larger sites a mix of pitch sizes can be included to reflect the needs of different sized families. The intention of the capacity work was to take account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures to achieve a suitable development.

- 3.18 DLP planning generally take a conservative view of pitch numbers to reflect the benefits of incorporating community amenity provision, open space, good access and appropriate landscaping within proposed site layouts. A generous approach to amenity, landscaping and access arrangements was taken to ensure a high standard of design can be achieved on site. This results in sufficient access and accommodation space to create a site which residents from the Gypsy and Traveller community find attractive. At the same time, sufficient space and landscaping will help to conserve the residential amenity of any neighbouring uses.
- 3.19 Issues such as neighbouring uses and residential amenity were conducted on a subjective basis considering issues such as proximity, overlooking from habitable and non-habitable windows, height and proximity of adjacent properties and initial views on the noise and pollution impacts of uses, such as employment, railways, sewerage works, roads and electricity pylons. It is not intended to include specific noise and air quality monitoring.

## 4.0 Site Assessment and Capacity Findings

- 4.1 All sites identified for assessment at Part 1a, were as outlined from the source of sites within para 3.2. This resulted in a total of 52 sites being assessed at Part 1a.

### Part 1a Suitability and Availability Matrix

- 4.2 The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 4.3 As part of the study the Council wrote (March 2016) to all promoters of SHLAA/ Call for Sites submissions identified in Part 1a, to establish if the site could potentially be made available for Gypsy and Travellers use. Responses were used to inform the assessment of availability in Part 1a.
- 4.4 The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Appendix B**. A traffic light approach has been utilised, to identify where sites do not satisfy the criteria in red, where the criteria may be capable of being satisfied in yellow and where the criteria are satisfied in green.
- 4.5 Sites identified as red have not gone forward to be assessed in **Part 1b**. 25 sites were rejected in **Part 1a** and therefore 27 sites were examined further in **Part 1b**.

### Part 1b Suitability, Availability and Achievability Site Assessments

- 4.6 **Part 1b** involved a more detailed assessment of suitability, availability and an examination of achievability issues. This involved the circulation of sites to relevant Council and Environment Agency officers for specific comments on the principle of use and any necessary mitigation to achieve potentially suitable options.
- 4.7 **Appendix C** sets out those sites where it is considered there is no potential for further provision and the reasons for this decision.

### Part 2 Reconfiguration of Lonesome Way

- 4.8 As part of the study, specific consideration was given to the reconfiguration of the existing public site at Lonesome way, Streatham Vale to identify if additional capacity could be created.
- 4.9 The Part 2 work involved the specific consideration of the reconfiguration of Lambeth's existing site by an architect/urban designer within the DLP team. There are no specific

standards for minimum pitch size and in reality the sizes of pitches across the country varies considerably, especially in urban and rural contexts and also public and private provision. DLP utilised the following documents to guide the potential reconfiguration work:

- 'Designing Gypsy and Traveller Sites', CLG, May 2008 (acknowledging that this guidance was withdrawn on 1<sup>st</sup> September 2015);
- Caravan Licence Model Standard 2008. (Acknowledging that these standards do not apply to sites occupied by G&T caravans, but that many of the design principles are reflected in Designing Gypsy and Traveller sites 2008 and numerous existing G&T sites across the country are subject to Caravan licensing;
- London Gypsy and Traveller Unit working paper, Net Density and Gypsy and Traveller sites in London, 2009;

4.10 From our initial review of the site it is clear that the site is already well developed with 16 pitches and that the objective of the assessment is to consider, if the site is capable of intensification for a small number of pitches.

4.11 The London Gypsy and Traveller Unit working paper Net Density and Gypsy and Traveller sites in London (2009) suggest a range of 21-28 pitches per hectare based on a selection of existing public sites across London. At 0.56 ha Lonesome Way is already developed at a higher density than other public sites in London, therefore an important part of the criteria will be to ensure that health and safety issues are not undermined or exacerbated through intensification.

4.12 The ESRO Ethnographic Research Report "Lambeth Gypsy Site - Lonesome Depot" (2011) highlights well known issues experienced by the Gypsy Community and states that "Gypsies and Travellers are likely to be less healthy (and have a lower life-expectancy), be less educated and live in lower-quality and less stable housing than the general population. They are also more likely to be unemployed, suffer mental health problems, come into contact with the criminal justice system, and commit suicide" Part 2 criteria needed to ensure that a suitable resident environment could be provided.

4.13 The reconfiguration work considered the following issues to ensure appropriate solutions are put forward.

- Site boundaries and relationships with surrounding uses;
- Access and egress

- Density, spacing and parking
- Pitch provision (hard standings and amenity blocks)
- Lighting and security
- Communal areas and maintenance
- Landscaping and open space
- Flooding
- Health and safety
- Fire safety
- Utility supplies
- Drainage, sanitation and refuse

### **Conclusions**

- 4.14 In conclusion Lonesome Way is not capable of additional pitches. A potential revised configuration maintains 16 pitches, but includes a better turning head geometry to the access road, new amenity and play area facilities and generally squarer pitches.
- 4.15 The existing site, measured by an average density range of 21-29 pitches is dense (actual 28.5 pitches/hectare) and is at the upper limit compared to other sites in London. The density cannot be improved due to the shape of the site, oblique access road and general deficiencies of the existing site that would need to be addressed to bring it up to best practice standards.

## 5.0 Recommendations

### Pitch and Plot Targets

- 5.1 'Planning policy for traveller sites' (CLG, 2015) requires local planning authorities to set pitch targets for Gypsies and Travellers to meet likely permanent and transit site accommodation needs arising in each area.
- 5.2 The Gypsy and Traveller Accommodation Needs Assessment, being undertaken by ORS will identify the need for new permanent residential Gypsy and Traveller pitches to meet residential needs. These pitch targets should be included within the Local Plan Review.

### A Supply of Deliverable and Developable Sites

- 5.3 In developing the Local Plan Review, 'Planning policy for traveller sites' (CLG, 2015) requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites sufficient to provide five years' worth of sites against those locally set targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.
- 5.4 DLP recommend that to address the requirement to ensure that identified need is met throughout the Plan period, the Council may need to consider the following:
- Safeguarding the existing site;
  - Allocating potential sites;
  - Ensure a fair and reasonable criteria policy is established and supplemented by identified delivery partners and funding sources.

### Safeguarding the Existing Site

- 5.5 It is suggested that the Council should continue to safeguard their existing Gypsy and Traveller site, to ensure that existing needs continue to be met in perpetuity (as set out in Lambeth's Local Plan, Policy H10). If the site was lost from this use, then new replacement pitches may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch targets.

**Table 2 Safeguarding Existing Authorised Gypsy and Traveller Sites**

Site ref	Site name	Ward	Existing Provision
LBC053	Streatham Vale (Lonesome Way)	Streatham South	16 pitches

- 5.6 Part 2 of this study considered the scope for additional pitches at Lonesome way and concluded that a suitable reconfiguration that resulted in increased pitch provision that meet required health and safety and access standards could not be achieved.
- 5.7 Currently Lonesome way has 16 authorised pitches (including one pitch currently being reinstated). At present two pitches are currently vacant. Whilst the site is not considered suitable for further pitch provision and rejected in **Appendix C**, two pitches are potentially available and are therefore available to contribute to future pitch needs identified in the GTAA.

#### **Sites with Potential for Further Consideration**

- 5.8 The study has identified no other potentially suitable or available sites within the Borough, therefore subject to the needs identified in the GTAA compared to the identified capacity of the existing site at Lonesome Way, the Council may need to consider undertaking further site identification work or undertaking duty to co-operate discussions with its neighbouring authorities.
- 5.9 Details of all sites included within the study and rejected are included within **Appendix C**.

#### **Monitoring**

- 5.10 As with other forms of development, the supply of Gypsy and Traveller sites should be balanced to ensure that it corresponds with identified needs. Monitoring of supply and demand on a regular basis is therefore essential
- 5.11 It may be necessary to revisit the identification of sites process, subject to the outcome of the updated Gypsy and Traveller Needs Assessment. DLP Planning suggest that it would be prudent for the Council to continue to include gypsy and traveller uses in future call for sites exercises and monitor site/pitch availability. Active monitoring of supply against demand on an annual basis, as required by 'Planning Policy for Traveller Sites', would determine the need for any further work on this issue and ensure that the Council is able to demonstrate that it has an up to date five year supply compare to needs if required to determine speculative planning applications or deal with unauthorised activity.