

Gypsy and Traveller Sites Assessment Matrix (January 2016)

Current Council Policies

Black Country Core Strategy Policy HOU4 sets out indicative targets for new pitches and plots and states that the local authorities will allocate sites through Site Allocation Documents and Area Action Plans. The policy sets out criteria to be used to assess proposals where there is demonstrable need not met through allocated sites.

The BCCS does not provide criteria to be used directly to allocate sites. However, SAD Policy HC4 uses the BCCS criteria as the basis for the selection of the proposed sites in the SAD.

A large number of potential sites would meet these criteria. The total capacity of the sites listed in the Preferred Options version of the SAD is well in excess of that required to meet the BCCS targets, particularly for gypsies and travellers (the capacity of the potential showpeople sites is only just sufficient). Changes since the accommodation need assessment was made in 2008, especially in current and emerging Government policy, mean that the current need for sites is also likely to be less. It is therefore necessary to develop a more refined matrix to identify which of the potential sites would be most suitable for allocation.

The total capacity of the sites identified in the SAD would be 120 traveller pitches and 13 showpeople plots. Some of the traveller sites, with a total capacity of up to 40 pitches, are identified as also being suitable as showpeople plots. If used as such, the total capacity would be 80 traveller pitches and 53 showpeople plots. However, the Preferred Options SAD suggested that a maximum of only 28 permanent pitches and 30 plots are required between now and 2026. These numbers could be reduced further depending on the methodology used to calculate need.

Government Policy

The Government formerly published a Good Practice Guide on Designing Gypsy and Traveller Sites. This addressed both site location and selection, and site layout. The Guide was referred to in a large number of representations received from residents objecting to a site proposed in the SAD at Poplar Avenue, Bentley (however, the Guide had not been referred to in any documents produced by the Council for the Preferred Options consultation). However, the current Government withdrew this guide at the end of August 2015.

The only current Government guidance that might help in producing a site assessment matrix is in the Planning Policy for Traveller Sites, a revised version of which was also issued in August 2015. Relevant points in this Policy include the following.

Paragraph 4:

Government's aims in respect of traveller sites are:

- d. plan-making and decision-taking should protect Green Belt from inappropriate development.

- e. to promote more traveller site provision while recognising that there will always be those travellers who cannot provide their own sites.
- i. to reduce tensions between settled and traveller communities
- j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- k. for local planning authorities to have due regard to the protection of local amenity and local environment

Paragraph 10:

Local planning authorities should, in producing their Local Plan:

- a) identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites
- b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- d) 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.
- e) protect local amenity and environment.

Paragraph 13:

Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies:

- a) promote peaceful and integrated co-existence between the site and the local community
- b) promote, in collaboration with commissioners of health services, access to appropriate health services
- c) ensure that children can attend school on a regular basis
- d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
- e) 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
- f) avoid placing undue pressure on local infrastructure and services
- g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
- h) 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.

Paragraph 16:

Traveller sites in the Green Belt are inappropriate development.

Paragraph 18:

Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical.

Paragraph 19:

Local planning authorities should have regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage equipment.

There is no current published Government guidance on the design of plots for Showpeople. However, the Showmen's Guild has produced its own guidance, and this has been used to estimate the capacity of potential showpeople sites.

Preferred Options Consultation

Representations received at the Preferred Options stage raised a number of issues. Some of these are similar to those in the Government policy above, whilst some could be useful in a site assessment matrix. Other issues however, are not planning issues or could apply to any proposal for gypsies, travellers and/or travelling showpeople. The points raised included:

- Increase in crime/ anti-social behaviour/ flytipping and rubbish
Not a site specific issue so would not be appropriate for matrix
- Impact on schools and health services that are already overloaded
Relates to Govt Policy paragraph 13 clauses b) and c). However, impact on these services is also an issue for sites proposed in the SAD for general housing so is not specific to GTTS sites. All the GTTS proposed in the SAD would have at least moderate access to these services.
- Traffic and access difficulties for large vehicles/ caravans
Some of the proposed sites might have access difficulties, so this issue should form part of the matrix. Could also be considered under Impact on infrastructure in Govt Policy paragraph 13 f).
- Will travellers pay Council Tax/ utility bills etc.?
- Property devaluation
Neither of these issues are material to site selection
- Physical conditions on some sites: poor drainage, mineshafts, air pollution
These issues would affect some of the proposed sites, and are related to Govt policy paragraph 13 e).
- Site is in middle of built up area: traveller site will not integrate with existing community
Relates to Govt policy paragraph 13 clause a) and paragraph 18
- Alternative uses preferred, including affordable housing, open space, community facilities and car parking
Relevant where there is evidence of a shortfall of land for these uses in the area.

Scoring Mechanism

A traffic light system is proposed as follows. This is similar to that used in the original Gypsy, Traveller and Travelling Showpeople Site Survey carried out for the Council in 2010.

Red – site does not meet the required standards, and issues are incapable of being addressed

Amber – site does not fully meet required standard but could be brought forward if alternatives are limited or if the issue can be mitigated

Green – site meets required standard.

This scoring mechanism has only been used to assess the potential traveller sites. Given that fewer potential showpeople sites have been identified, and they have not raised the same degree of controversy, the mechanism has not been used to assess showpeople sites.

Proposed Matrix

1) What is the potential capacity?

This assumes a density of 22 pitches per hectare. There is no longer a maximum recommended size in national guidelines of 15 pitches per site, however this size limit has still been adhered to because of community cohesion and to minimise the concentration of sites in any single part of the borough.

2) Is site in Green Belt?

3) Ownership? Walsall Council/ willing landowner/ other?

4) Would location promote peaceful and integrated co-existence between the site and the local community?

5) Would there be a potential adverse impact on amenity and the local environment?

This relates to issues such as nature conservation sites on or adjacent to the site that are not examined under the other criteria in the matrix.

6) Is the site deliverable within 5 years, or does it lie in a broad location that could be delivered in years 6 to 10?

It is possible that other sites might come forward during the period of the plan. These could include “consider for release” surplus employment land or other small areas of previously developed land that could be suitable either for general housing or for traveller sites. The potential sites that are named below as deliverable in years 6 to 10 therefore only represent a sample of such sites.

7) Are there any local environmental quality issues such as noise and air quality that might impact on travellers locating on the site?

8) Is site affected by any physical constraints such as ground conditions or flooding?

9) Would there be any adverse impact on local infrastructure and services relating to issues such as access? The response assumes that the number of pitches is limited to that stated (more pitches, for example, would generate more traffic)

10) Is there potential for mixed residential and business use?

11) Is there an identified need to use the site for an alternative use that cannot be easily accommodated elsewhere?

This matrix only assesses potential permanent gypsy and traveller sites. Some of the criteria could also be used to assess transit sites (although none are proposed in the SAD) or showpeople sites. Some of the sites might also be suitable for use by showpeople. However sites for travelling showpeople are expected to be all privately owned and developed. The Preferred Options consultation identified potential sites

that should be sufficient to meet the projected need for sites to accommodate travelling showpeople. The consultation did not raise any issues as to why any of these sites should not be taken forward. Therefore, it is proposed that all of the identified sites for new accommodation for travelling showpeople should be included in the Publication version of the SAD.

Site Name	Reference	1) Potential capacity (pitches)	2) In Green Belt?	3) Ownership	4) Integration with Local Community	5) Impact on local environment	6) Deliverable?	7) Environmental quality issues?	8) Physical constraints	9) Impact on local infrastructure	10) Potential for mixed use?	11) Need site for alternative uses?	Comments	Suitable for Allocation?
Cartbridge Lane	GT5	4	Yes	Private – existing site	Site originally allowed on appeal but no recent adverse representations	No adverse impact	Yes – existing site	None	None	None	No. Area is entirely residential	No	Site currently has temporary planning permission granted on appeal pending SAD	Yes, residential only
34-38 Gould Firm Lane (a)	GT6	4	Yes	Private – existing site	Isolated site with no nearby community. Only one representation received at Preferred Options stage	No adverse impact	Yes – existing site	None	None	None	No. Surrounding area is open countryside	No	Site currently has personal planning permission	Yes, residential only
Willenhall Lane (b)	GT1	2	Yes	Council – existing site	Isolated site. No representations received at Preferred Options stage	No adverse impact	Yes, subject to funding. Green belt location would be an obstacle	Close to motorway: noise and air quality issues but may be within acceptable limits	Part of site is in flood zone	None	Yes, existing industrial area nearby	No	Site is already at maximum recommended size for community cohesion. Location in Green Belt and proximity of motorway noise also rules out further substantial expansion	Yes
Rear of 48-72 Foster Street, Blakenall	GT50	3	No	Private – owned by traveller	Backland development adjacent to existing single pitch. Large GT community in bricks and mortar housing nearby	No adverse impact	Would require private developer	None	None	Narrow access may not be suitable for larger vehicles	No. Area is entirely residential	No. Planning application for conventional residential development has been refused previously because of limited amenity space	Small site would have minimal impact on surroundings if used for residential only	Yes, residential only

Goscote Lodge Crescent	HO 27	15 (d)	No	Council (additional surrounding land is owned by WHG)	Site is currently isolated but is part of larger regeneration area with new housing proposed. History of unauthorised encampments on site. 132 signature petition and 11 individual letters at PO stage refer to site. Large GT community in bricks and mortar housing nearby	No adverse impact	Would require funding and consideration of layout in relation to surrounding proposed housing development	None	None	None	No. Area is proposed for residential development	Potential impact on viability of regeneration proposals for wider area if conventional housing is omitted from part of site	Difficult to design site in isolation from consideration of residential layout of wider area	No, unless as part of wider development. Would not be allocated if Dolphin Close goes ahead
Dolphin Close (Goscote Site C)	HO 28	10	No	Council	Adjacent to supported housing scheme. 40 signature petition and 22 individual letters at PO stage refer to site. Large GT community in bricks and mortar housing nearby	Canal adjacent but forms defined boundary	Yes, subject to funding	None	None	Adjacent canal bridge unsuitable for larger vehicles, but alternative access to west	Yes. Existing industrial estate opposite	There are regeneration proposals in wider area but this site is capable of freestanding development	Self contained site that is separated from main residential area. Potential for business use on vacant land opposite	Yes
Goscote Copper Works	HO 29	15 (d)	No	Private – owner did not respond to Preferred	Part of large regeneration site (the largest potential housing site)	Canal adjacent but site is large enough to	Would require willing owner, funding and	None	Site believed to be contaminated as result of	None	Site is former factory, but surrounding area is residential	Potential impact on viability of regeneration proposals for wider area if conventional	Difficult to design site in isolation from consideration of residential layout of wider area	No, unless as part of wider development. Would not be allocated if

				Options consultation	in the borough) but adjacent to established residential area. 40 signature petition and 35 individual letters at PO stage refer to site. Large GT community in bricks and mortar housing nearby, also existing showpeople site	allow screening	consideration of layout in relation to surrounding proposed housing development		previous use			housing is omitted from part of site		Dolphin Close goes ahead
Poplar Avenue	HO 44	13	No	Council	Currently open space but adjacent to established residential area. Large number of objections at PO stage: 835 letters received (most with standard format)	Currently open space	Yes, subject to funding. Would require substantial landscaping to screen from existing housing and open space	Close to motorway: noise and air quality issues but may be within acceptable limits	Former landfill site adjacent. Any development would need to address ground gas	None	No. Area is entirely residential	Currently open space but there is a surplus in area	Use would be out of keeping with bricks and mortar housing in surrounding area. Also substantial community opposition	No
Churchill Road (c)	HO 180	15	No	Private – site has outline planning permission for residential development and current reserved matters	Currently open space but adjacent to established residential area. Large number of objections at PO stage: 832 letters received (most with	Currently open space	Unlikely in view of private ownership and advanced stage of housing proposals	Close to motorway: noise and air quality issues but may be within acceptable limits	Former landfill site adjacent. Any development would need to address ground gas	None	No. Area is entirely residential	Currently open space but site already has planning permission for housing	Use would be out of keeping with bricks and mortar housing in surrounding area. Also substantial community opposition and site is now in private ownership with advanced proposals for housing	No

				application, but no representation received from owner at PO stage	standard format)									
Land East of Mill Street	HO 49	5	No	Council	Adjacent to mosque and established but deprived residential area. Potential cultural tensions between communities. 41 letters and 244 signature petition received at PO consultation stage	Site is within boundary of SLINC, but this designation mainly relates to the railway cutting to the rear	Yes, subject to funding	None	None	None	No. Immediate area is entirely residential or community uses	Local community have requested that site should be car park to serve mosque and church	Substantial community opposition in immediate vicinity, area is very congested, especially in terms of car parking.	No Site is too small to make an allocation for another use in the SAD.
Former Metal Casements	HO 62	15 (d)	No	Private – owner did not respond to Preferred Options consultation	Adjacent to established but deprived residential area. 8 individual letters and 300 signature petition received at PO consultation stage.	Canal adjacent but site is large so room to screen	Would require willing owner and funding, including need to address limestone working if this part of site was used	None	Northern part of site is within limestone working	Access is through narrow residential streets	Yes. Site is former factory and area is mix of residential and industry	Potential housing site but any development would need to address limestone working	Unsuitable ground conditions under much of site. Willingness of landowner is also unclear, and there is substantial community opposition	No, except for part of site not affected by limestone and unless landowner confirms support. However, this part of the site is also close to existing houses and has poor access
Darlaston Multi-Purpose Centre Site	HO 306	15 (d)	No	Council – under offer	Within established residential area. Large number of representations received at PO stage: 134	Protected trees on edge of site but would not significantly constrain development	Yes, subject to funding and dependent on whether sale for housing proceeds	None	None	Access is through narrow residential streets. Limited visibility	No. Industry nearby but immediate surroundings are residential and community uses	Potential general housing site. Local community have also suggested community uses	Substantial community opposition, also access may not be suitable. Potentially not available if discussions on a housing	No

					individual letters and petitions with total of 2642 signatures.					splay if access was from Victoria Road			development are progressed.	
Royal British Legion Club, Broad Lane Gardens, Bloxwich	HO 313	15	No	Council – current leaseholder seeking to terminate	Adjacent to established residential area. 2 individual letters and 168 signature petition received at PO stage. No known existing GT community nearby, but existing Council site is in same ward	No adverse impact. Japanese Knotweed on part of site	Yes, subject to funding and termination of lease	Railway adjacent but noise unlikely to be sufficient to make site unsuitable	None	None	No. Surrounding area is entirely residential	Potential general housing site. Local community have requested starter homes	Self-contained site but no potential for business use and also some community opposition	No
Mill Street	HO 41	10	No	Private – one of the owners submitted representation at Preferred Options stage opposing GT use	Mixed use area with industry and deprived residential area. 41 letters and 244 signature petition received at PO consultation stage	None	No, landowner of part of site opposes proposal	None	None	Access through narrow residential streets, but industrial traffic already uses some of these	Yes. Mix of residential and industrial uses adjacent	Potential general housing site	Landowner is opposed to proposal. Also substantial community opposition	No

Notes:

- (a) This is the existing traveller site that has a personal planning permission. The site was incorrectly described in the Preferred Options SAD as The Paddock, which is actually the adjacent site.
- (b) Addition of two pitches to existing site through conversion of former community room/ office. It should be noted that this conversion would not require planning permission, but details are included in this assessment to ensure details of all potential additional sites are listed.
- (c) This is part of the site described as Poplar Avenue in the Preferred Options SAD.
- (d) Total physical capacity would be more than this if the whole site was used.

Total Capacity of Potential Sites

Cartbridge Lane (GT5)	4 (existing temporary site to be made permanent)
Gould Firm Lane (GT6)	4 (existing site with personal permission to be made permanent and unrestricted)
Willenhall Lane (GT1)	2 (additional pitches on existing site)
48-72 Foster Street (GT50)	3
Dolphin Close (HO28)	10
Total	23

The GTAA revision methodology suggests that between 10 and 20 additional pitches are required by 2026, in addition to the retention of the temporary or personal pitches at Cartbridge Lane and Gould Firm Lane. Willenhall Lane, 48-72 Foster Street and Dolphin Close would provide a total of 15 pitches.

Subject to confirmation in any revised GTAA, the above sites would therefore provide adequate capacity and no further sites would be required to meet identified need. Other sites may come forward as “windfalls” in the same way as small general housing sites, through vacant land in the urban area. An example is a single family pitch that has recently been developed in Croft Street, Willenhall, although this does not at present have planning permission.

Should the above sites not be deliverable or developable, one of the following sites might be a potential alternative, although each of the three sites fails to fully meet several points in the scoring mechanism:

POTENTIAL ALTERNATIVE SITES IF ABOVE ARE NOT DELIVERABLE/ DEVELOPABLE

Goscote Copper Works (in place of Dolphin Close) (HO29)	15
Goscote Lodge Crescent (in place of Dolphin Close) (HO27)	15
Metal Casements (part of site outside limestone area) (HO62) (but note concerns above about proximity to existing residents and poor access)	15

The following potential sites identified in the Preferred Options SAD fail to meet one or more significant points in the scoring mechanism and these points are incapable of being addressed. They are therefore no longer proposed as potential traveller sites:

SITES NO LONGER PROPOSED AS POTENTIAL TRAVELLER SITES

Poplar Avenue (HO44)
 Churchill Road (HO180)
 Mill Street (HO41)
 Land East of Mill Street (HO49)
 Darlaston Multi-Purpose Centre Site (HO306)
 Royal British Legion Club, Broad Lane Gardens, Bloxwich (HO313)