LBTH Gypsies and Travellers
Criteria for additional sites in Tower Hamlets

August 2009

Introduction
The purpose of this paper is to define and agree a set of criteria which will guide, through the Local Development Framework (LDF), the identification of additional sites which can be developed to accommodate the Gypsy and Traveller community of Tower Hamlets as required by national and regional policy.

This paper will only define the criteria to be incorporated in the Core Strategy. Identification of actual sites based on the criteria will take place through the Site Allocations DPD.

Legal framework
There are a number of policies and guidance at national and regional level which address the issue of Gypsy and Traveller accommodation. At national level the main policies and guidance can be found in The Housing Act 2004, the Department of Communities and Local Government (DCLG) Circular 01/2006 Planning for Gypsy and Traveller Sites and Circular 04/2007 Planning for Travelling Showpeople. At the regional level the main guidance is contained within the consolidated London Plan.

The Housing Act 2004 requires local authorities to include Gypsies and Travellers in their accommodation needs assessment and to draw up a strategy demonstrating how the accommodation needs of Gypsies and Travellers will be met as part of their wider housing strategy.

Guidance from the DCLG through Circulars 01/2006 and 04/2007 provides clear instructions on the process for identifying potential sites for Gypsies and Travellers. The Circulars require local authorities to identify suitable sites based on criteria that are fair, realistic and achievable. The criteria should be used to meet current demands and any future demands as they arise.

Furthermore, Policy 3A.14 of the consolidated London Plan, in accordance with the Housing Act 2004, requires local authorities to review current pitch capacity and assess the accommodation needs of Gypsies and Travellers (this has now been undertaken by the London wide Gypsy and Traveller Accommodation Needs Assessment and a report for the findings is available). The Policy also reiterates the need to set criteria for identifying new sites as well as stressing the need to protect existing sites.

Background information
At present, Tower Hamlets has only one authorised Gypsy and Traveller residential site located at Eleanor Street. The site currently at full capacity accommodate 19 pitches, with scope for the creation of 1 or 2 additional
Following the London wide Gypsy and Traveller Accommodation Needs Assessment (GTANA), Tower Hamlets has been identified as requiring a further 19 to 33 pitches in the next 5 years and a further 6 to 7 in the following 5 years to meet growing demands.

The requirement for additional pitches identified for Tower Hamlets by the GTANA is reiterated in the recently published Housing Strategy from the Mayor of London’s office.

In accordance with best practise, officers consulted with the residents of Eleanor Street to discuss the proposed criteria. The outcome of this consultation is included in this report.

**Criteria**

As per DCLG guidance, an agreed set of criteria is required to guide the identification of potential sites from those sites identified in the Strategic Housing Land Availability Assessment (SHLAA).

Presented below is a set of draft criteria that has been drawn up by pulling together guidance contained within DCLG Circular 01/2006, design work undertaken by Crossrail at the current Eleanor Street site and from preliminary consultation with Tower Hamlets Gypsy and Traveller community.

**Criteria identified through DCLG guidance**

Sites should

- Be those that are identified as suitable for bricks and mortar housing
- Have access to local services including shops, schools, GPs and other health services
- Have good means of access from roads and be near bus routes and other transport modes
- Be relatively flat and suitable for trailers and mobile homes.
- Not be located near refuse site, industrial or other hazardous places
- Not be located on contaminated land unless decontaminated
- Not be located in areas of high flood risk (Flood Risk Zone 3)

Where possible sites should

- Be located close to mainstream housing development to encourage social integration with the settled community
- Be able to provide visual and acoustic privacy
- Not be located next to light industrial areas

*Extra consideration needs to be given to the health and safety of children and others as well as the issue of greater noise transference through caravan walls when considering sites next to main roads, flyovers and railway lines*
**Criteria identified through Gypsy and Traveller preliminary consultation**

Sites should
- Be in locations where normal housing would be
- Be located close to good services
- Be in a good location overall

Where possible sites should
- Be able to accommodate at least 5 pitches
- Not be overlooked

**Sites unavailable for G&T settlements**

There are a number of sites that will not be appropriate for locating a Gypsy and Traveller residential site, these will include sites
- In areas that are in Flood Risk Zone 3
- In areas with Public Transport Access Level (PTAL) 5-6
- In centre locations
- Already identified as not developable such as Metropolitan Open Land

In terms of local Tower Hamlets circumstances, it was considered that any sites deemed appropriate housing would have good access to shops and services; would be relatively flat; and have the appropriate level of amenity from its surrounding uses.

Therefore for Tower Hamlets purposes if was identified that the criteria should include:
- Those that have been identified as suitable for housing
- Have good means of access from roads and be near bus routes and other transport modes
- Not be located in areas of high flood risk (Flood Risk Zone 3).

**Site identification stages**

1. Draft and agree criteria through consultation
2. Include criteria in the Core Strategy DPD
3. Scope future site(s) opportunities for G&T
4. Review pitch allocation with GLA
5. Test site allocations through option process
6. Include pitch allocations in London Plan
7. Test feasibility/deliverability of site(s)
8. Include G&T site(s) in Site Allocations DPD

**Size of sites**

There are no set criteria as to how big sites should be or how many pitches it should accommodate, although DCLG guidance does recommend that a maximum of 15 pitches on any one site would provide a comfortable environment for the residents and one that is easy to manage. However, case studies have shown smaller sites of 3 to 4 pitches providing accommodation for one extended family can also be successful.
However, there is some guidance from the DCLG on what an average family size pitch and smaller pitches should be able to accommodate, giving a good idea on how big pitches need to be and subsequently how big sites should be.

According to the DCLG guidance an average family size pitch should be able to accommodate
- One amenity building
- One large trailer and one touring caravan (or two trailers)
- Lockable shed for bicycles, wheelchairs etc
- Drying space for clothes
- Small garden area
- Parking space for two vehicles

A smaller pitch would need to accommodate
- One amenity building
- One large trailer
- Drying space for clothes
- Parking space for at least one vehicle

Consideration also needs to be given to growing families need for larger family units and to those families who may possess larger mobile homes, the needs of which should be reflected by pitch sizes.

**Key stakeholders**
- David Ferrell    Head of Environmental Services
- Hugh Chambers    Equalities and Information Officer
- Jennifer Richardson    Strategic Planning Manager
- Mifta Ahmed    Strategic Planner
- Eleanor Street Residents