



Local Plan Review

Publication Plan

**Gypsy and Traveller Site Assessment
Staffordshire County Council Owned Land**

September 2022

Contents

Section	Page number
1. Introduction	1
2. National policy and guidance	2
3. Methodology	4
4. Assessment results	6
5. Conclusions	16
Appendix 1: Policy HC9: – Gypsies Travellers and Travelling Showpeople	17

Introduction

- 1.1 The Council has produced this paper in response to an identified shortfall within the Local Plan Review 2018-2039 for Gypsy and Traveller pitch provision. The Council is therefore exploring all options available to making up the shortfall including assessing the suitability of publicly owned land to deliver a publicly owned site(s). This paper assesses land owned by Staffordshire County Council. South Staffordshire District Council previously undertook an assessment of its own land to identify potentially suitable sites (published November 2021)¹.
- 1.2 Staffordshire County Council has provided the South Staffordshire District Council with GIS layers of their landholdings that had previously been suggested to the district council for housing through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. These landholdings have been split into 10 individual parcels to assess them. When analysing the larger parcels, the assessment relates to the most suitable area(s) within that parcel (e.g. areas of land outside of flood zones).

¹ <https://www.sstaffs.gov.uk/doc/182816/name/G%26T%20Public%20Site%20Search%202021.pdf/>

2. National policy and guidance

2.1 Planning Policy for Traveller sites (PPTS) 2015 set out the Government's planning policy for traveller sites. Sections relevant to this assessment include:

2.2 Paragraph 13 of the guidance sets out that:

'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 14 states:

'When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.'

In relation to Traveller sites in the Green Belt the guidance states:

Paragraph 16:

'Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to

clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.'

Paragraph 17:

'Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.'

This assessment also considers the guidance contained within the *'Designing Gypsy and Traveller Sites - Good Practice Guide (2008)'*

3. Methodology

Site requirements

- 3.1 There are no definitive guidelines on the measurements of traveller sites or for individual pitches. However, the Designing Gypsy and Traveller Sites - Good Practice Guide (2008) guidance states that sites should be between 3 and 15 pitches (paragraph 4.7). The guidance goes on to state that pitches should allow space for a mobile home and touring caravan as well as amenity building, parking and vehicle turning room. The ability to accommodate at least 3 pitches will be considered when assessing the sites.

Assessment criteria

- 3.2 The ten site parcels have been assessed against the following criteria which are based upon but not limited to emerging Local Plan Policy 'HC9 – Gypsies Travellers and Travelling Showpeople' (provided as appendix 1) and other relevant Local Plan policies:

Highway and access: Comments have been received from Staffordshire County Highways including red, amber, green (RAG) scoring for each site. These comments are directly reproduced in the assessment proformas in section 4. (criteria 'e' and 'l' of Policy HC9).

Flooding: A desktop assessment has been carried out using GIS mapping based on the Council's Strategic Flood Risk Assessment (SFRA) to see if any of the sites are within flood zones 2 or 3 (criteria 'j' of Policy HC9).

Habitat / landscape: A desktop assessment has been undertaken by officers utilising GIS mapping to consider the presence of landscape or habitat designations.

Historic environment: The Council has appointed specialist historic environment consultants (AOC Archaeology) to undertake a Historic Environment Site Assessment (HESA) in order to assess both the direct and indirect impacts on the historic environment of sites coming forward. A RAG score has been applied scoring each site low, medium, or high impact for each.

Infrastructure: A high level assessment of whether necessary infrastructure could be provided on site (criteria 'a' of Policy HC9). For example, is there scope for essential services such as power, water, drainage, sewage disposal and refuse/waste disposal to be provided on site.

Amenity of future pitches: A desktop assessment of any uses within close proximity of the site which may conflict or impact upon the amenity of pitches (criteria 'd' of Policy HC9).

Impact on existing communities: Consideration of potential impacts including ensuring that there would be no unacceptable strain on local infrastructure or a

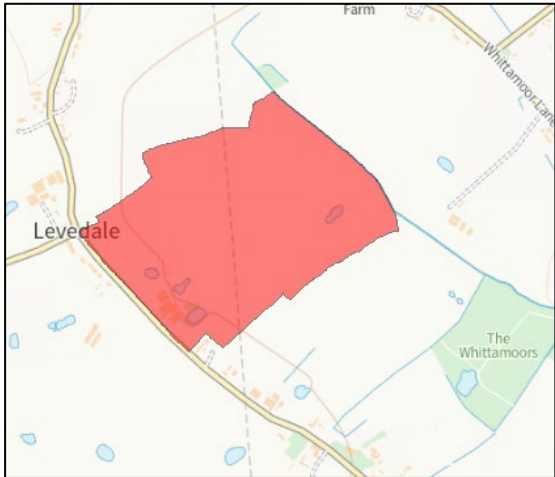
dominating effect on the nearest settled communities (criteria 'f' and 'k' of Policy HC9).

Other considerations: Any other relevant considerations

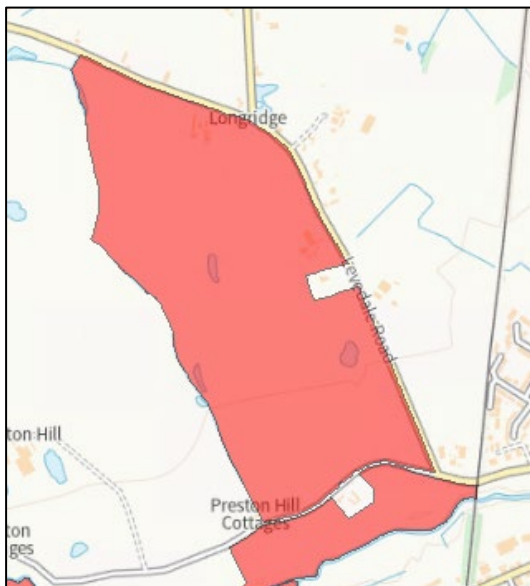
Potentially suitable for allocation: The above factors are considered in the round to reach an overall conclusion on the site's suitability.

4. Assessment results

4.1 The assessment of the 10 parcels is provided in the 10 assessment proformas below:

Parcel 1: Land east of Levedale Road	
	<p>Assessment summary</p> <p>Highways / access: Red - Strong initial concerns due to poor access to local facilities via pedestrian footways.</p> <p>Flooding: Not within flood zones 2 or 3.</p> <p>Habitat / landscape: Not within the Green Belt and no habitat designations in close proximity to the site. However, the site is open with extensive views into / across the site from the surrounding countryside.</p> <p>Historic Environment: Direct impact – low, Indirect impact – Medium; due to nearby listed buildings and scheduled monument.</p> <p>Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be provided on site.</p> <p>Amenity of future pitches: No issues identified.</p> <p>Impact on existing communities: The development of the site for pitches has the potential to dominate the local community at Levedale including the row of residential properties adjacent to the site.</p> <p>Other: The site is within a mineral safeguarded area.</p> <p>Potentially suitable for allocation: No – The site is considered unsuitable due to highway concerns. It is also considered that the provision of pitches at this site would have a dominating effect on the community at Levedale adjacent to the site. The open nature of the site would also likely result in landscape harm which would be difficult to mitigate.</p>

Parcel 2 – Land west of Levedale



Highways / access: Red - Strong initial concerns due to poor access to local facilities via pedestrian footways.

Flooding: The section of the site south of Preston Vale Lane is within flood zones 2 and 3. The land further north is not within any flood zone.

Habitat / landscape: No Green Belt or habitat designations. However, the site is open with extensive views into / across the site from the surrounding countryside.

Historic Environment: Direct impact – **Low**, Indirect impact – **Medium**; due to the nearby conservation area and listed buildings.

Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

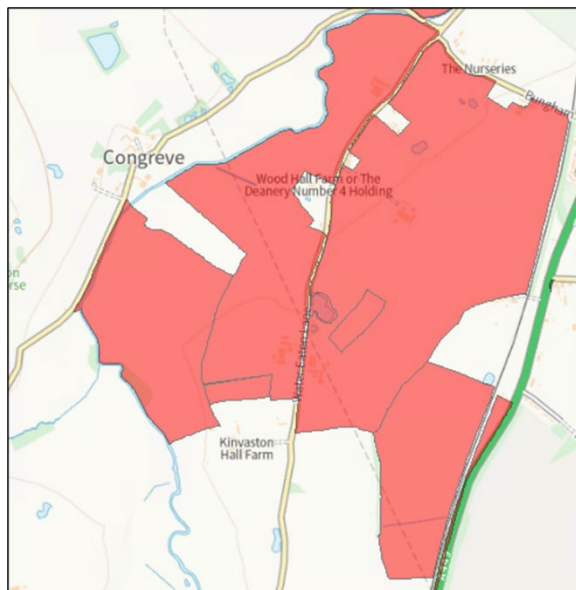
Amenity of future pitches: No issues identified.

Impact on existing communities: The provision of pitches at the part of the site close to Longridge has the potential to dominate the local community.

Other: The site is within a mineral safeguarded area.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway concerns. The open nature of the parcel would also likely result in landscape harm which would be difficult to mitigate. Development of some areas of the parcel would also result in an unacceptable dominating effect on the local community in Longridge.

Parcel 3: Land at Water Eaton Lane



Highways / access: Red - Strong initial concerns due to pedestrian access to local facilities and narrow bridge crossing constraining vehicular access.

Flooding: A large part of the north – western section of the site is within flood zones 2 & 3 due to the River Penk, but the remaining section including the other side of Water Eaton Lane is outside of the flood zones.

Habitat / landscape: The site is within the Green Belt. There are no habitat designations. The site is open with extensive views into / across the site from the surrounding countryside.

Historic Environment: Direct impact – **Low**, Indirect impact – **Medium**; due to nearby listed buildings.

Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: The amenity of any pitches may be impacted by the railway line if located within its close proximity.

Impact on existing communities: If pitches were located towards the east of the site they would be within close proximity to the edge of Penkridge. There is a small community where Bungham Lane meets Water Eaton Lane. If the pitches here located here they could have a dominating impact on that community.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway concerns including a lack of suitable access being achievable. The site is also within the Green Belt.

Parcel 4 – Land North of Pinfold Lane / Whiston Road



Highways / access: Red - Strong initial concerns due to pedestrian access to local facilities and narrow country lanes in surrounding area.

Flooding: A large proportion of the site is within flood zones 2 and 3. However, a section of the south – eastern part of the site is outside of any flood zone.

Habitat / landscape: The site is within the Green Belt. There are no habitat designations. The site is open with extensive views into / across the site from the surrounding countryside.

Historic Environment: Direct impact – **Low**, Indirect impact – **Low**.

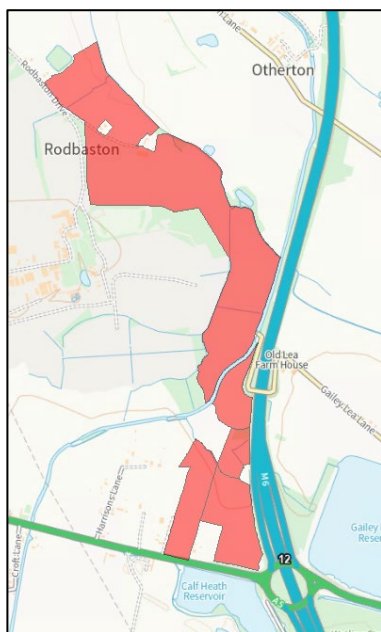
Infrastructure: There are no nearby commercial or residential properties. Therefore, it may be difficult to secure infrastructure onto the site.

Amenity of future pitches: No issues identified.

Impact on existing communities: No nearby properties.

Potentially suitable for allocation: No - The site is considered unsuitable due to highway concerns including suitable accessibility. The site is also within the Green Belt and susceptible to landscape impacts due to its openness.

Parcel 5 – Land at Rodbaston



Highways / access: Amber - Initial concerns regarding feasibility of establishing site access and distance from facilities via pedestrian footway network. Consult with Highways England.

Flooding: A proportion of the site is within flood zones 2 & 3 due to the presence of a brook, which may also impact upon the ability to access the site from Rodbaston Drive.

Habitat / landscape: The site is within the Green Belt. An SBI borders part of the site. There are no other habitat designations.

Historic Environment: Direct impact – **Medium**
Indirect impact – **Medium**; due to the scheduled monument and impact on the canal.

Infrastructure: The site is within close proximity to South Staffordshire College so has the potential to benefit from available infrastructure connections.

Amenity of future pitches: The M6 motorway is within close proximity to the west of the site.

Impact on existing communities: It is considered that the development of this parcel is likely to be incompatible with the nearby South Staffordshire College.

Potentially suitable for allocation: No – The site is considered unsuitable partially due to highway impacts and the ability to secure a suitable access as well as a likely conflict with South Staffordshire College. There would also be a direct and indirect impact upon the historic environment. The parcel is also within the Green Belt.

Parcel 6 – Land south of Langley Road



Highways / access: **Green** – no principle objection.

Flooding: There are small sections of flood zones 2 & 3 to the south of the site.

Habitat / landscape: Green Belt land.

Historic Environment: Direct impact – **Low**, Indirect impact – **Medium**; due to nearby listed buildings.

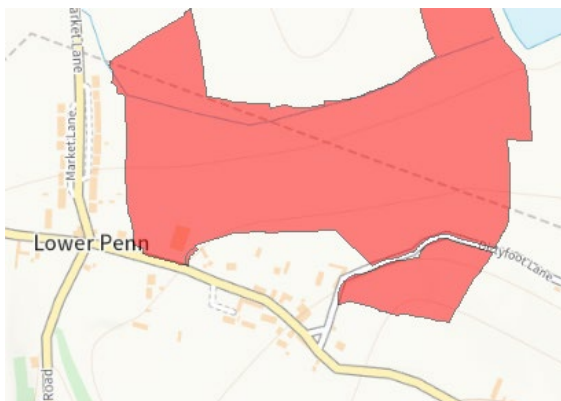
Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: No issues identified.

Impact on existing communities: To the east of the site there are 5 properties along Drive Fields within close proximity to the eastern edge of the site. There are also a number of residential properties adjacent to the north – eastern edge of the site along Langley Road.

Potentially suitable for allocation: **Yes** – The site is considered potentially suitable subject to further investigation.

Parcel 7 – Land north of Springhill Lane



Highways / access: Red - Strong initial concerns regarding feasibility of establishing site access and distance from facilities via pedestrian footway network.

Flooding: There are small sections of flood zones 2 & 3 to the north of the site.

Habitat / landscape: Green Belt land. Although currently screened from Springhill Lane, the site is open in nature and would have significant landscape impacts.

Historic Environment: Direct impact – **Low**, Indirect impact – **Medium**; due to the potential impact upon the Lower Penn Conservation Area and nearby listed buildings.

Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: The impact of nearby agricultural operations would need to be considered.

Impact on existing communities: The west of the site back on to residential gardens on properties along Market Lane. There are also residential properties opposite the site on Springhill Lane. Pitches at this location could have a dominating impact upon this community around the junction of Market Lane and Springhill Lane.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway impacts including the ability to secure a suitable access. The site is also within the Green Belt.

Parcel 8 – Land off Dirtyfoot Lane



Highways / access: Red - Strong initial concerns regarding feasibility of establishing site access and distance from facilities via pedestrian footway network.

Flooding: There are small sections of flood zones 2 & 3 to the north of the site.

Habitat / landscape: Green Belt land.

Historic Environment: Direct impact – **Low**, Indirect impact – **Medium**; due to the potential impact upon the Lower Penn Conservation Area and nearby listed buildings.

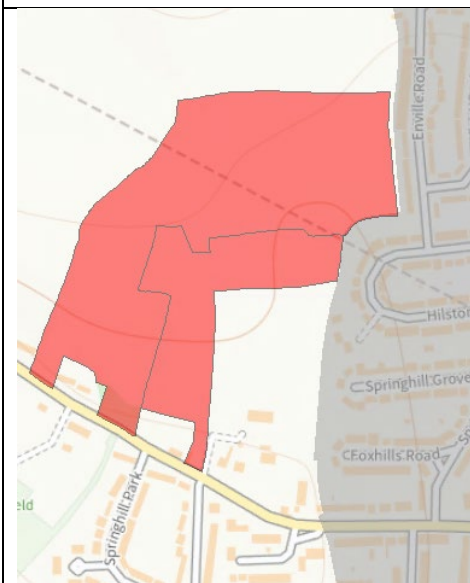
Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: The impact of nearby agricultural operations would need to be considered.

Impact on existing communities: The impact upon the nearby properties linked with agriculture would need to be considered.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway impacts including the ability to secure a suitable access. The site is also within the Green Belt.

Parcel 9 – Land north of Springhill Lane



Highways / access: Amber - Initial concerns regarding feasibility of establishing site access.

Flooding: Not within flood zones 2 or 3.

Habitat / landscape: Green Belt Land. There is a significant slope down towards the site which may present issues providing pitches on the site.

Historic Environment: Direct impact – **Low**, Indirect impact – **Low**.

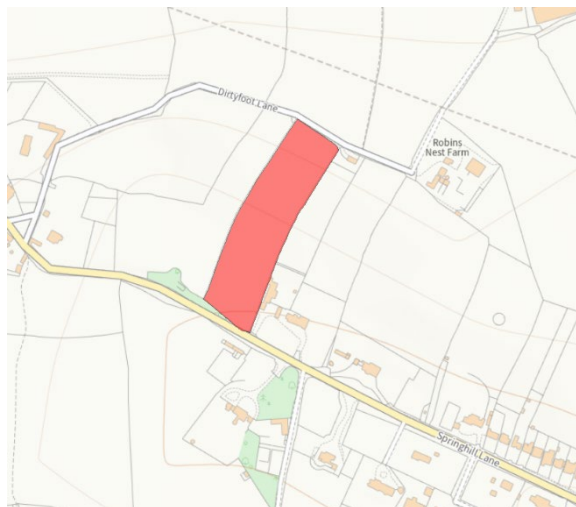
Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: No issues identified.

Impact on existing communities: There are established communities to the south and east of the site. Impact upon Sandhills Day Nursery would also need to be considered.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway impacts including the ability to secure a suitable access as well as the steep gradient of the potentially making development difficult. The potential impact upon the existing community / nearby uses is also a consideration. The site is also within the Green Belt.

Parcel 10 – Land between Springhill Lane and Dirtyfoot Lane



Highways / access: Red - Strong initial concerns regarding feasibility of establishing site access and distance from facilities via pedestrian footway network.

Flooding: Not within flood zones 2 or 3.

Habitat / landscape: Green Belt land. There are some limited view across the site and wider landscape from Springhill Lane which would be opened up further with an access being provided.

Historic Environment: Direct impact – **Low**, Indirect impact – **Low**.

Infrastructure: Nearby residential and commercial properties mean it is likely infrastructure can be secured on site.

Amenity of future pitches: No issues identified.

Impact on existing communities: Development of the site for pitches could impact the existing settled community nearby to the east of the site on Springhill Lane.

Potentially suitable for allocation: No – The site is considered unsuitable due to highway impacts including the ability to secure a suitable access. The site is also within the Green Belt.

5. Conclusions

- 5.1 This assessment has assessed 10 parcels of land owned by Staffordshire County Council (SCC) that had previously been suggested to us for consideration through the SHELAA Call for Sites process for housing.
- 5.2 Out of the 10 parcels assessed the most common key constraint identified was around suitable highways and pedestrian access to the site, with the assessment directly informed by input by the highways team at SCC. Of the 10 parcels assessed, 7 (parcels 1,2,3,4,7,8,10) were attributed a red score indicating 'strong initial concerns with highways impacts or achieving access to site'. Meanwhile, two of the sites (parcels 5, 9) were attributed an amber score indicating 'Initial concerns with highways impacts or achieving access to site'.
- 5.3 Only one land parcel, parcel 6 – 'Land south of Langley Road', did not result in initial highways concerns from SCC, scoring a green indicating 'ok in principle subject to minor or significant highways improvements'. Neither did the assessment process identify any other key issues that would indicate that parcel 6 is wholly unsuitable, and therefore based on this assessment, it is considered potentially suitable for allocation.
- 5.4 However subsequent to this assessment, further correspondence with SCC has confirmed that they do not consider that these sites would be acceptable or viable unless as part of a wider strategic development area / site allocation and comprehensive master-planning exercise. As none of these parcels have been assessed as suitable for housing allocation through our site assessment process, and there is not a willing landowner to deliver them as a standalone gypsy and traveller site, **none of the parcels assessed (including parcel 6) are considered deliverable.**

Appendix 1 - Policy HC9 – Gypsies Travellers and Travelling Showpeople

Policy HC9: Gypsies Travellers and Travelling Showpeople

Applications for Gypsy, Traveller and Travelling showpeople pitches or plots will only be supported where all of the following criteria are met:

- a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal are provided on site.
- b) The site is well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area. Where tree and hedgerow boundaries border the site these should be retained and where possible strengthened.
- c) A minimum 10% biodiversity net gain is demonstrated in accordance with Policy NB2.
- d) The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with Policy HC11. Sites must be designed to ensure privacy between pitches and between the site and adjacent users, including residential canal side moorings. Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.
- e) The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.
- f) The proposal, either in itself or cumulatively having regard to existing neighbouring sites, is of an appropriate scale so as to not put unacceptable strain on infrastructure or dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.
- g) Pitches are of an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or unnecessary sprawl. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding.
- h) Built development in the countryside outside the development boundaries is kept to the minimum required, in order to minimise the visual impact on the surrounding area. Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new

pitches in the Green Belt set out in Policy SA6 will be acceptable in principle, subject to conformity with Policy SA6 and all criteria in this policy.

- i) Any amenity buildings proposed are of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.
- j) Proposals are not located in areas at high risk of flooding.
- k) Where the proposal is for travelling showperson provision, the site is large enough for the storage, maintenance and testing of items of mobile equipment, and does not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.
- l) Where the proposal is for a transit site, proposals avoid locations that are accessed via narrow country lanes and are in locations with good access to the strategic highway network.

Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case-by-case basis.

Development proposals should be consistent with other Local Plan policies.