

Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study

On behalf of East Herts Council



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1 Introduction and Background

1.1 Introduction

- 1.1.1 East Herts Council (the Council) has appointed Peter Brett Associates LLP (PBA) to provide advice on the delivery of pitches and plots, which will help to identify sites required to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople identified in the Accommodation Needs Assessment (2014) undertaken by Opinion Research Service (ORS). The objective of this study is to identify potential assessment areas and assess potential sites to determine if they are suitable, available and achievable.
- 1.1.2 The results of this study will inform the development of relevant policies and allocations in the emerging District Plan and guide the consideration of future planning applications for Gypsy, Traveller and Travelling Showpeople sites.

1.2 Background

1.2.1 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 or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such." (Planning policy for traveller sites, CLG, March 2012).

- 1.2.2 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.
- 1.2.3 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.
- 1.2.4 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under the Race Relations Acts.
- 1.2.5 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 family's or dependent's more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above." (Planning policy for traveller sites, CLG, March 2012).



- 1.2.6 The Government published a new policy statement 'Planning policy for traveller sites' in 2012, 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.
- 1.2.7 Local planning authorities are currently required to identify and allocate sufficient sites to meet the needs of these groups within their local plans (East Herts District Plan). This means that when delivering sites consideration is required to which sites are available and suitable for different types of the travelling community.



2 Existing Sites and Needs

2.1 Introduction

- 2.1.1 'Planning policy for traveller sites' (CLG, March 2012) 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).
- 2.1.2 The 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:
 - Set pitch and plot 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.
- 2.1.3 The Council commissioned consultants, ORS, to carry out an Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople within East Herts; the objective of that assessment being to quantify the number of Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs to 2031. The Study provides evidence to address the first two requirements set out above.
- 2.1.4 The Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study seeks to identify and assess potential sites to meet the needs identified in the Accommodation Needs Assessment. Peter Brett Associates' objective is to provide evidence to support the Council to identify and allocate sites and establish criteria policy in the emerging District Plan.

2.2 Existing sites

Gypsies and Travellers

- 2.2.1 In East Herts there is a need for residential Gypsy and Traveller sites. Residential sites provide residents with a permanent home and can be privately owned, publicly rented for affordable pitches, or privately rented to other Gypsies and Travellers. The size and the amount of facilities available on these sites varies between sites.
- 2.2.2 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*¹ states that "an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan… drying space for

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¹ Communities and Local Government (2008) Designing Gypsy and Traveller Sites Good Practice Guide



- 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.
- 2.2.3 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.
- 2.2.4 In East Herts local authority area there are currently 5 private and occupied Gypsy and Traveller sites, ranging in size from single pitch family sites to one site containing over 20 pitches. There are no publicly owned sites in East Herts.

Table 2.1: Existing Gypsy and Traveller Sites in East Herts

Site No.	Site Name	Settlement	Planning Status	Green Belt location
EH001	The Stables, Bayford Lane	Bayford	Private authorised site	Within Green Belt
EH004	Esbies Estate	Sawbridgeworth	Private unauthorised site	Within Green Belt
EH005	Elmfield Stables	Throcking	Private unauthorised site	Not within Green Belt
EH013	Nine Acres	High Cross	Private authorised site	Not within Green Belt
EH014	Field Green	Levens Green	Private authorised site	Not within Green Belt

2.2.5 Three sites have full planning permission and two of the sites are unauthorised.

Travelling Showpeople

- 2.2.6 The needs of Travelling Showpeople are different to Gypsies and Travellers. Their sites often combine residential, storage and maintenance uses. Typically a site contains areas for accommodation, usually caravans and mobile homes, and areas for storing, repairing and maintaining vehicles and fairground equipment. These combined residential and storage sites are known as plots.
- 2.2.7 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots (or yards) are also occupied throughout the year, often by older people and families with children, for example. The Showmens Guild 'Model Standard Package' which provides model standards and site considerations when developing and planning for Travelling Showpeople sites.
- 2.2.8 In East Herts area there is currently 1 privately owned and occupied Travelling Showpeople's site. The site represent permanent base for the family which is occupied when they are not travelling for work.

Table 2.2: Existing Travelling Showpeople Site in East Herts

Site No.	Site Name	Settlement	Planning Status	Green Belt location
EH007	Rye House Caravan Park	Rye House, Hoddesdon	Private authorised site	Within the Green Belt



East Herts Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2014

- 2.2.9 A new Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (ANA) was completed by consultants Opinion Research Services (ORS) for East Herts Council in April 2014.
- 2.2.10 As part of that study, interviews were attempted with every Gypsy and Traveller household in the area who were present during the fieldwork period in January 2014. In total, interviews were achieved on-site with 5 households.
- 2.2.11 The ANA estimates that the extra site provision to meet residential needs between 2014 and 2031, for East Herts, is 12 pitches. The ANA outlines the methodology of how this number was derived.
- 2.2.12 This includes the need of existing households on unauthorised sites, households on the waiting list for a public site and new households likely to occur by 2031 due to household formation. The majority of the pitches will be required for private sites.
- 2.2.13 Interviews were attempted with 100 Showpeople households in the area. Interviews were achieved with 20 Travelling Showpeople. All 20 interviews were carried out with Travelling Showpeople at a yard in Rye House.
- 2.2.14 The estimated extra site provision to meet residential needs for the Travelling Showpeople households between 2014 and 2031 is 5 plots to address the needs of all identifiable households. **Table 2.3** below sets out the ANA need for East Herts in 5 year time periods:

Table 2.3: ANA need for East Herts in 5 year time periods

	2014-2018	2019-2023	2023-2028	2029-2031	Total
Gypsy and Traveller Residential Pitches	7	1	2	2	12
Travelling Showpeople Plots	1	1	2	1	5

2.2.15 The ANA does not identify a need for either a public transit site or temporary stopping place within East Herts for either Gypsies and Travellers or Travelling Showpeople.

2.3 Number of Sites Required

- 2.3.1 National evidence would suggest that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family. Government guidance suggests that "experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of between 3-4 pitches can also be successful, particularly where designed for one extended family" (para 4.7).
- 2.3.2 It is therefore difficult to identify the exact number of sites required to meet the pitch requirements for East Herts. The actual number of sites required will be determined according to a number of factors including taking account of:
 - The different cultural, ethnic and family groupings of Gypsies and Travellers;
 - The extent to which additional provision could be made through extension or intensification of existing sites; and
 - Whether replacement sites need to be found for existing sites which may be unsuitable or unsustainable.



2.3.3 For Travelling Showpeople, the future need will arise from the occupants of existing yards and is likely to require additional sites.



3 Potential Assessment Areas

3.1 Introduction

- 3.1.1 The study has investigated the potential for the identification of potential assessment areas within East Herts that could be used in conjunction with a criteria policy to guide the subsequent identification or consideration of specific sites through the planning application process.
- 3.1.2 Criteria for defining potential assessment areas have been developed taking account of national and local policy, guidance and identified physical constraints. Potential assessment areas have then been defined taking account of the key criteria.
- 3.1.3 The work has been informed by a stakeholder workshop held on 30 April 2014. Stakeholders included Councils representatives, Gypsy and Traveller support services and representatives from the travelling communities from the East Herts area came together to discuss potentially suitable locations for Gypsy, Traveller and Travelling Showpeople sites, what constitutes a good site and what planning constraints are considered most significant.
- 3.1.4 **Appendix A** sets out a map defining potential assessment areas for Gypsy and Travellers and Travelling Showpeople. The policy process and consideration of criteria used to define the potential assessment areas is set out below in more detail.

3.2 Policy Background

National policy

- 3.2.1 National planning policy for Gypsies and Travellers is contained within 'Planning policy for traveller sites'². This identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years or developable within years 6-15, sites should:
 - Be suitable the site should be in a suitable location for development;
 - Be available the site should be available now or there should be a reasonable prospect that the site is available at the point envisaged;
 - Be achievable there is a realistic or reasonable prospect that housing could be viably developed at the point envisaged.
- 3.2.2 Local planning authorities should identify sufficient deliverable sites to provide five years' worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth. The study has used the term potential assessment areas instead of broad locations to avoid confusion with the terminology of the Draft East Herts District Plan. The Draft District Plan already uses the term Broad Locations in reference to proposed large scale strategic development sites at East of Welwyn Garden City, North and East of Ware, and the Gilston Area.
- 3.2.3 National policy recommends that criteria based policies should be developed irrespective of whether need is identified or not. If need is identified they should be used to guide land allocations, while if there is no identified need they should provide a basis for determining planning applications which may nevertheless come forward.

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² Planning policy for traveller sites, Communities and Local Government, March 2012



- 3.2.4 Criteria "should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community" (para. 10). 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. This is one of the principal reasons why the Government is no longer relying simply upon criteria based policies to bring forward suitable sites for Gypsies and Travellers, and instead places the focus upon local authorities to identify specific deliverable sites to provide for their identified need.
- 3.2.5 'Planning policy for traveller sites' identifies a series of issues for criteria to address to ensure that traveller sites are sustainable economically, socially and environmentally. Specific policies set out the national approach towards sites in rural areas and the countryside (Policy C), rural exception sites (Policy D), sites in Green Belt (Policy E), mixed planning use sites (Policy F), major development projects (Policy G) and determining planning applications (Policy H).

Local policy

East Herts – local policies

3.2.6 East Herts adopted its current Local Plan in 2007. This includes policy HSG 10 'Accommodation for Gypsies' set out below:

Policy HSG 10 Accommodation for Gypsies

- (I) This policy applies to proposals for the use of land as a site for gypsy and traveller accommodation. Any permission granted under this policy will be subject to a condition limiting occupation to gypsies and travellers as defined in paragraph 3.17.1.
- (II) If the site is not in the Green Belt, a proposal for a gypsy and traveller site will be permitted provided that each of the following criterion is met:
 - (a) the site is in a sustainable location in terms of accessibility to existing shops, social, education and health services and potential sources of employment:
 - (b) the site is suitable in terms of vehicular access, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage and waste disposal;
 - (c) the site is not affected by environmental hazards that may affect the residents' health or welfare;
 - (d) the occupation and use of the site would not cause undue harm to the amenity of local residents by reason of noise, disturbance or loss of privacy;
 - (e) the proposal is capable of being visually assimilated into the surrounding landscape without significant adverse effect;
 - (f) within nationally recognised designations, the proposal will not compromise the objectives of the designation;
 - (g) the proposal respects the scale of the nearest settled community.
- (III) In the Green Belt, new gypsy and traveller sites are inappropriate development and in addition to the above criteria will be expected to demonstrate that harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
- 3.2.7 Since then the Council has consulted upon a Draft District Plan. This includes Policy HOU7 'Gypsies and Travellers and Showpeople' set out below:



HOU7 Gypsies and Travellers and Travelling Showpeople

I. To meet the identified need, xx pitches for Gypsies and Travellers and xx plots for Travelling Showpeople will be provided within the District at the following locations:

Dependent on outcome of two shortly to be commissioned studies: Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment, and Gypsies and Travellers and Travelling Showpeople Identification of Potential Sites Study.

To be shown in form of table with phasing.

- II. In order to identify exact locations within the areas allocated to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople listed above, and to assess suitability where planning applications are submitted for non-allocated sites, the following criteria should be satisfied:
 - (a) the site is in a sustainable location in terms of accessibility to existing local services;
 - (b) the site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;
 - (c) proposals make adequate provision for on site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches proposed;
 - (d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;
 - (e) the site can be integrated into the local area to allow for successful co-existence between the site and the settled community;
 - (f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on site business activities, noise, disturbance, or loss of privacy;
 - (g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;
 - (h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;
 - (i) within nationally recognised designations, proposals would not compromise the objectives of the designation.
- III. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.
- IV. New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.
- V. Any development granted under this policy will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.
- VI. Existing authorised sites for Gypsies and Travellers and Travelling Showpeople will



be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet an identified need.

3.2.8 The site assessment criteria have been developed to reflect the adopted Local Plan and draft District Plan policy criteria, relating to Gypsy, Traveller and Travelling Showpeople Sites.

Other policy and guidance

- 3.2.9 Other relevant considerations which should be taken into account include:
 - National policy set out within the National Planning Policy Framework; and
 - Communities and Local Government (CLG) Best Practice Guidance: Designing Gypsy and Traveller Sites (2008).
- 3.2.10 These policies and guidance have been taken into consideration when developing site criteria and identifying potential assessment areas within East Herts.

3.3 Criteria for Identifying Potential Assessment Areas

3.3.1 Taking account of the national and local policy context, detailed discussion at the stakeholder workshop centred around the following themes:

How potential sites relate to spatial strategies

- Settlement hierarchy and the relationship of sites to sustainable settlements
- Access to the road network and major public transport corridors
- Accessibility to key services
- Impact on local infrastructure

Fit with needs

- Location of current site provision
- Pattern of movements through the district
- Needs of different travelling communities

Avoiding physical constraints and protected areas

- Nature conservation designations
- Green Belt
- Landscape considerations
- Historic built environment designations
- Floodplain and areas of high flood risk



Relationship with other land uses

- Co-existence with local communities
- Scale of sites relative to the settled community
- Mixed planning use sites
- Noise and air quality
- 3.3.2 Having regard to the national and local policy context and following discussions at the stakeholder workshop, the following site criteria for determining potential assessment areas have been identified:

Table 3.1: Criteria for Identifying Potential Assessment Areas

Fit with spatial strategy	Gypsy and Traveller residential sites and Travelling Showpeople sites should, where possible, be located reasonably close to sustainable settlements with a range of local services.
Strategy	If required, Gypsy and Traveller transit sites should be very close to main transport routes, in the southern part of the District.
	Local infrastructure should be capable of accommodating development.
Fit with identified	Gypsy and Traveller residential sites and Travelling Showpeople sites should have good access to local services.
needs	New Gypsy and Traveller residential sites should reflect the patterns of emerging needs to avoid the need for long distance travelling. Extensions to existing sites may be appropriate to accommodate future immediate family needs.
	Any Gypsy and Traveller transit sites should be located along historic transit routes.
Avoiding physical	Sites should not be located within an international, national or local nature conservation designation or in a location where it will have a significant effect upon any designation.
constraints	Sites should not be located within Green Belt except in very special circumstances.
and protected areas	Sites should not be located within areas at high risk of flooding which cannot be mitigated.
	Sites should not be located within historic parks and gardens or scheduled ancient monuments.

3.4 Identifying Potential Assessment Areas

Fit with spatial strategies

- 3.4.1 'Planning policy for traveller sites' (CLG, 2012) states that "local planning authorities should ensure that sites are sustainable economically, socially and environmentally" (para 11).
- 3.4.2 Local planning authorities should strictly limit the provision of sites in the open countryside away from existing settlements or areas allocated in the development plan but can provide for sites in rural areas subject to further considerations (para 23). Where there is a lack of affordable land to meet the needs of the travelling communities, local planning authorities in rural areas should consider allocating small sites specifically for affordable pitches in small rural communities (para 13).
- 3.4.3 Sites should be located so as to provide a settled base that reduces the need for long distance travelling and unauthorised encampment (para 11).



- 3.4.4 The draft District Plan currently states that provision will be made to meet the identified need for pitches and plots. The draft policy also provides assessment criteria for non-allocated sites.
- 3.4.5 At the stakeholder workshop, there was a general support to incorporate sites for the travelling communities within planned urban extensions. However, it was noted that some urban extensions are more advanced than others and, by implication, may be too far advanced to be able to accommodate future sites.
- 3.4.6 At the stakeholder workshop, whilst it was acknowledged that site provision should reflect, in general terms, the pattern of needs, it was agreed that new sites for Gypsies, Travellers and Travelling Showpeople should not be restricted to where existing need arises at the moment. All sustainable settlements should be considered as potential suitable locations for sites.
- 3.4.7 At the stakeholder workshop, it was agreed that sites should be located with a reasonable access to services but views were expressed that due to high property and land prices and the expectations of current landowners in those locations for higher value development, it was unrealistic to expect private residential Gypsy and Traveller sites to come forward within or immediately adjacent to settlements and that a more flexible approach should be taken. It was pointed out that national policy does not preclude development within the countryside.
- 3.4.8 'Planning policy for traveller sites' (CLG, 2012) states that local planning authorities should promote access to appropriate health services and ensure that children can attend school on a regular basis but avoid placing undue pressure on local infrastructure and services (para 11).
- 3.4.9 Local planning authorities should ensure adequate play areas for children (para 24).
- 3.4.10 The adopted East Herts Local Plan 2007 policy HSG10 states that sites should be in a sustainable location and accessible to shops, social, education and health services and potential sources of employment.
- 3.4.11 The draft East Herts District Plan 2014 policy HOU7 states that sites should be in a sustainable location in terms of accessibility to existing local services.
- 3.4.12 The Showmen's Guild of Great Britain has published a Model Standard Package (The Showmen's Guild of Great Britain, 2007) which states that sites should have good vehicular access, suitable for the ingress and egress of large vehicles and should be in close proximity to a good road network. The site should be close to schools and other community facilities.

Fit with needs

- 3.4.13 The current sites are spread across East Herts. The needs of the sites' occupants were taken into account in the work undertaken by Opinion Research Services, which concluded that the extant permissions on the three existing authorised sites would be sufficient to meet the future needs arising from their resident households.
- 3.4.14 There are two unauthorised sites in East Herts, located in Throcking (EH005 Elmfield Stables) and Sawbridgeworth (EH004 Esbies Estate). Both sites are not permitted and form part of the current need figure identified in the ANA. The needs for each site are: 1 pitch from (EH005), and 5 pitches from (EH004).
- 3.4.15 At the workshop held as part of this current study, it was stated that there is a pattern of historic unauthorised encampments around the southern part of East Herts and that this pattern of movement is generally related to visiting existing sites and employment links to London.



- 3.4.16 The existing private Travelling Showpeople's site is located in the south of the District and generally relates to the town of Hoddesdon, which is a town located outside the local authority boundary in the Borough of Broxbourne.
- 3.4.17 At the workshop it was confirmed that the existing spatial pattern reflects a long period of residence for the Gypsy, Traveller and Travelling Showpeople communities within East Herts, because they have lived in the area for a long time.
- 3.4.18 Those who attended the workshop or were visited on survey wish to remain on their current sites, and would like to gain planning permission for pitches on the existing sites.
- 3.4.19 Future residential Gypsy and Traveller site needs are predominantly generated from a combination of achieving pitches for those currently living on unauthorised sites, for family members living on another site or to meet future household growth from existing sites.
- 3.4.20 Stakeholders commented that the easiest and most appropriate way of meeting future needs would be to extend existing sites or to locate new sites in the same general locations. The best location to meet future need is where they are now. New sites should be small, family owned sites located relatively close to local facilities.
- 3.4.21 There is currently no public site provision within East Herts.
- 3.4.22 The needs of Gypsies and Travellers do not stop at local authority boundaries and the delivery for all types of sites (especially public and transit sites) should be explored across these boundaries. There are a number of Gypsy and Traveller sites within neighbouring authorities, which are located close to the East Herts local authority boundary.
- 3.4.23 Areas reported to the workshop as being considered desirable by Gypsies and Travellers are on the eastern edge of Bishop's Stortford and Sawbridgeworth and in the south/west of the district covering Hertford, Ware and Hertford Heath area, which is a good location for London and work. One stakeholder highlighted that there are a number of people on the County Council waiting list for Gypsy and Traveller sites.
- 3.4.24 Stakeholders stated that Travelling Showpeople sites should be relatively large to meet residential and business needs and to meet future family needs. There is only one Travelling Showpeople site in East Herts district and it is quite large with 40 plots.

Avoiding physical constraints and protected areas

- 3.4.25 The National Planning Policy Framework identifies that protection should be given to international, national and locally designated biodiversity and geological conservation sites. Heritage assets of the highest significance, such as Scheduled Monuments, battlefields and historic parks and gardens should also be protected and development at these locations wholly exceptional. The NPPF also states that local planning authorities should give great weight to conserving landscape and scenic beauty, wildlife and cultural heritage in National Parks.
- 3.4.26 'Planning policy for traveller sites' identifies areas at high risk of flooding including functional floodplains should be avoided given the particular vulnerability of caravans.
- 3.4.27 In discussing these issues, the stakeholder group agreed that there are a number of constraints within national policy which identifies such locations as generally inappropriate for built development.
- 3.4.28 For the purposes of defining potential assessment areas, these areas are:
 - Areas at high risk of flooding e.g. zones 3a and 3b;



- International, National and Local Environmental Designations, such as Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and other sites of importance for nature conservation such a Sites of Nature Conservation Importance (SNCI);
- Ancient Woodland;
- Historic assets such as Historic Battlefields, Historic parks and gardens and Scheduled Ancient Monuments.
- 3.4.29 Development in the Green Belt is inappropriate, except in exceptional circumstances. Sites should be found elsewhere before looking within the Green Belt. Green Belt boundaries are currently being reviewed and this should be taken into account.
- 3.4.30 Other designations, such as listed buildings, conservation area, etc. whilst being a major constraint on development are not absolute constraints, as the acceptability or otherwise of development depends upon a site assessment of impact.

3.5 Recommended Potential Assessment Areas

3.5.1 Taking into consideration the themes and criteria outlined above, potential assessment areas have been identified for the purposes of the identification of specific sites beyond the first 5 years of the plan period and for use in development management decision making. The map at **Appendix A** shows the two potential assessment areas for Gypsy, Traveller and Travelling Showpeople sites.

Residential sites – Gypsy and Traveller sites and Travelling Showpeople sites

3.5.2 The potential assessment areas for residential Gypsy and Traveller and Travelling Showpeople sites is split into a hierarchy at 2 levels (see map in **Appendix A**):

Level 1 – Beyond the Green Belt - Sites beyond of the Green Belt should be looked upon as potentially favourable for the allocation of sites and in granting planning permission for Gypsy, Traveller and Travelling Showpeople use.

- **Level 2 Within the Green Belt -** If there are not enough sites identified beyond the Green Belt to meet identified need, then suitable sites within the Green Belt should be considered for allocation in the District Plan for Gypsy, Traveller and Travelling Showpeople use.
- 3.5.3 Green Belt policy is the defining consideration for the potential assessment areas, as it determines the geographical extent of zones 1 and 2. Green Belt is a significant constraint, and in the NPPF it states that development within the Green Belt is 'inappropriate development that should not be approved except in very special circumstances.'
- 3.5.4 Peter Brett Associates consider that an important distinction needs to be made between the consideration of national policy in a planning application context and its consideration as part of the District Plan preparation. Local Authorities have a statutory requirement to identify sites to meet the locally defined needs for Gypsy, Traveller and Travelling Showpeople and, whilst speculative planning applications for sites in the Green Belt would be considered inappropriate development except in 'very special circumstances', PBA consider that it would not be inappropriate for a Council to identify and allocate a site or sites in the Green Belt through the plan making process as an exceptional circumstance. The clear difference is that the Council has considered all other site options beyond the Green Belt and therefore need (which alone is very unlikely to constitute 'very special circumstances') is combined with evidence of a site's potential suitability (specifically its impact on Green Belt purposes) and the lack of available



- and suitable site alternatives in non-Green Belt locations to warrant an exceptional limited alteration to the Green Belt.
- 3.5.5 Green Belt boundaries are currently being reviewed and therefore the need for Gypsy and Traveller and Travelling Showpeople sites may inform the review of the Green Belt, if sites cannot be found beyond the Green Belt. If suitable sites cannot be identified within the most appropriate potential assessment area, the second potential assessment area (within the Green Belt) should be considered.
- 3.5.6 A series of issues then need to be considered. These are set out in the following paragraphs.
- 3.5.7 **Consideration 1** Within each potential assessment area, the following absolute constraints should be avoided:
 - Areas at high risk of flooding e.g. zones 3a and 3b;
 - International, National and Local Environmental Designations, such as Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR) and other sites of importance for nature conservation such a Sites of Nature Conservation Importance (SNCI);
 - Ancient Woodland;
 - Historic assets such as Historic Battlefields, Historic parks and gardens and Scheduled Ancient Monuments.
- 3.5.8 **Consideration 2 -** Within each potential assessment area, proximity to settlements should be a key consideration. An assessment of sites should take into consideration the distance from each site to health, education, welfare services and employment opportunities and if opportunities exist for residents to access public transport services.
- 3.5.9 **Consideration 3 -** The identification of further Gypsy, Traveller and Travelling Showpeople residential sites should focus on the potential assessment areas and should take into account where the need arises and the capacity of local infrastructure to determine the most appropriate potential assessment area to commence the site search.

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4 Methodology for Site Selection and Assessment

4.1.1 This section sets out the methodology Peter Brett Associates have followed to complete the site assessment study to identify sites to meet Gypsy, Traveller and Travelling Showpeople needs and establish site criteria for planning policy. A methodology has been developed that is driven by national guidance and are confident it will provide what is needed in an efficient fashion. The methodology was informed by the stakeholder workshop and made available for the Council's consideration. All comments received were fully considered before the methodology was finalised and applied to potential sites.

4.2 Source of Sites

- 4.2.1 PBA and the Council worked together to establish potential sites for assessment. This involved the consideration of a number of sources of sites and initial sieving to remove sites with no potential early in the process. The site search process considered the following sources:
 - Authorised sites All existing Gypsy and Traveller and Travelling Showpeople sites with full, temporary or personal consents or certificates of lawful use, were assessed for intensification and/or expansion of the existing sites and were taken forward to the Stage 1 assessment;
 - Unauthorised sites All existing unauthorised and tolerated sites and encampments were assessed and taken forward to the Stage 1 assessment;
 - Call for Sites All sites promoted for Gypsy and Traveller and/or Travelling Showpeople
 uses throughout the District Plan Call for Sites exercise were taken forward to the Stage
 1 assessment;
 - Council owned land PBA reviewed the GIS layer and undertook an initial sieve of Council owned land removing all unavailable or incidental public land such as public buildings, public open space, active waste facilities and highway verges. PBA included sites agreed with the Council, to be taken forward to the Stage 1 assessment. Hertfordshire County Council confirmed that they had no sites available for PBA to consider for Gypsy, Traveller and Travelling Showpeople use;
 - Surplus Public Sector Land: public sector land owned by other public bodies identified by the Council or through the Call for Sites exercise were taken forward to the Stage 1 assessment;
 - Sites from the Strategic Land Availability Assessment: Site owners/promoters of sites
 which were put forward to the SLAA process were contacted by letter to identify if they
 could potentially be made available for Gypsy and Traveller and/or Travelling
 Showpeople uses. All positive responses were taken forward to the Stage 1 assessment;
 - Strategic urban extensions or new settlements. All potential strategic development opportunities identified by the Council (e.g. proposed site allocations and Broad Locations for Development identified in the draft District Plan) were included within the Stage 1 assessment. Unlike specific sites, strategic sites and broad locations can only be assessed on a high level basis.

4.3 Identifying Criteria for Site Assessment

4.3.1 Based upon the review of available policy, guidance, workshop comments, identified site needs from the emerging Gypsies and Travellers and Travelling Showpeople Accommodation



Needs Assessment (ANA) and physical constraints, site criteria were identified for discussion and agreement with the Council. PBA then used the criteria to assess potential sites. The criteria can also inform future Council policy and subsequently be used to determine planning applications.

- 4.3.2 Account was taken of national policy, as contained within 'Planning policy for traveller sites' (CLG, 2012) and existing and emerging local policy, as contained within the adopted Local Plan and emerging District Plan.
- 4.3.3 Within the overall policy framework, the general approach to identifying appropriate site selection criteria was built upon the national planning policy framework:
 - Is the site available?
 - Is the site suitable?
 - Is the site developable, e.g. viable and deliverable?
- 4.3.4 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, paragraph 10). Criteria should be clear and 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.
- 4.3.5 PBA have taken account of the various criteria from the following sources including:
 - National Planning Policy Framework and National Planning Policy Guidance
 - 'Planning policy for traveller sites', CLG, March 2012
 - Adopted and emerging local policies within the Local Plan and Draft District Plan;
 - The Showmen's Guild of Great Britain 'Model Standard Package';
 - 'Designing Gypsy and Traveller Sites', CLG, May 2008; and
 - The views of the travelling communities and key stakeholders identified through the stakeholder workshop.
- 4.3.6 The site criteria were developed and applied in two stages, Stage 1 is set out below.

4.4 Stage 1 Initial Site Assessment

- 4.4.1 **Stage 1** in the assessment process involved a desk top study undertaking the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 4.4.2 The application of broad suitability criteria sieved out immediately sites which would be likely to fail on the grounds of contravening major constraints such as being within international environmental designations or within the boundaries of scheduled ancient monuments, etc.
- 4.4.3 Availability was identified throughout this study as a key criterion. With regard to existing occupied sites the future availability of the sites to accommodate additional pitches/plots or to expand was discussed with current owners/occupants and the Council.



4.4.4 A traffic light approach for the initial **Stage 1** desk top assessment was utilised, identifying where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow, and where criteria are satisfied in green. **Table 4.1** overleaf sets out the **Stage 1** Assessment Matrix.

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Table 4.1: Stage 1 Assessment Process

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



Criteria	Designation/Issue	Red (Sites does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Residential Amenity	Location of site in relation to existing dwellings		The site is adjacent existing dwellings and requires further investigation.	There are no adjacent dwellings and therefore no impact on residential amenity.
Historic Environment	Scheduled Ancient Monument (SAM) Sites of Archaeological Importance Historic Park and Garden Conservation Area Listed building	The site is likely to result in substantial harm to the significance of a Scheduled Monument, Grade I or II* Listed Building, or a Grade I or II* Registered Park and Garden.	The site could result in harm to elements which contribute to the significance of a designated heritage asset, which require further investigation.	The site is unlikely to harm the significance of any designated heritage asset or its setting.
Availability	Promoted 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.	Site availability is unknown and requires further investigation.	There is evidence that the landowner is willing to sell or develop the site as a Gypsy and Traveller and/or Travelling Showpeople site. Public owned sites deemed potentially available for Gypsy and Traveller and /or Travelling Showpeople's use.



4.4.5 If sites did not receive a "red" at Stage 1, the site was considered further at Stage 2. Stage 2 involved a more detailed assessment of suitability issues and an examination of developability. Potential capacity and delivery issues were also investigated.

4.5 Stage 2 Detailed Site Assessment

- 4.5.1 All **Stage 2** sites were visited by the consultant team. PBA are experienced in recording information and assessing sites in a consistent way and PBA recorded site details and surroundings using a standard proforma. All **Stage 2** sites were sent to key District and County Council officers, including highways, and development management, for comment. These comments fed into the **Stage 2** assessment, which involved a more detailed assessment of suitability and an examination of achievability issues. A further examination of availability was also undertaken at this stage.
- 4.5.2 Further investigations of assessment centred upon:
 - Availability landowners were contacted and it was identified whether sites would be made available and any potential legal or ownership constraints;
 - Suitability each site was assessed against the agreed criteria which was broadly grouped into policy requirements, physical constraints and potential impacts; and
 - Developability potential site constraints needing to be rectified which could affect viability and any potential alternative uses likely to affect deliverability were identified.
- 4.5.3 **Stage 2 Matrix**, in **Table 4.2**, overleaf provides the details for how sites were assessed relating to suitability, availability and achievability. For each potentially suitable and available site a proforma was completed, providing more detailed information, including a site map. All sites were measured to key services and facilities, to enable the Council to allocate the most sustainable sites in the event that a range of sites be identified for the Council's consideration.
- 4.5.4 All issues of potential delivery identified were subject to investigations where possible, with recommendations made regarding how they would be addressed. All sites that were considered suitable, available and developable 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 on site. This took account of:
 - Size and shape of site and character of the adjoining area;
 - 'Designing Gypsy and Traveller Sites', CLG, May 2008;
 - Relevant planning history; and
 - Design templates developed by Peter Brett Associates, as set out in Appendix I.

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Table 4.2: Application of Site Assessment Criteria

Draft criteria	Stage at which criteria considered	Designation/Issue	Reject	Accept but further investigation/mitigation required	Accept
Availability	Stage 2	Site promoted by landowners, agents or travelling community Public land confirmed as available	Site not available for Gypsy, Traveller or Travelling Showpeople use. There are known legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements which cannot be resolved. Public land has been identified in another plan / strategy for another use.	There continues to be doubt over whether the site is genuinely available for Gypsy, Traveller or Travelling Showpeople (GTTS) use after further investigations.	There is evidence that the landowner is willing to sell and/or a developer is interested in developing within the timeframe of the District Plan. There are no known legal or ownership problems, such a multiple ownerships, ransom strips, tenancies or operational requirements which are not capable of being overcome within the timeframe of the District Plan. Public site is not identified in a plan or strategy for another use.
Suitability					
Contamination and unstable land	Stage 2 Note: Will be considered at stage 1 if information available	Contaminated Land Unstable Land	Contains an area of unstable or contaminated land that is likely to undermine the site's suitability and achievability.	Could contain unstable or contaminated land that should be subject to further investigation.	Not located on unstable land. Not located on contaminated land.
Topography	Stage 2	Topography	Steep slopes which make the site unsuitable and/or unachievable.	Sloping or undulating land which may require works to achieve a suitable development.	Level or gently sloping site.



Site access and safety	Stage 2	Access Proximity to major roads	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.
Accessibility to facilities	Stage 2	Access to facilities: GP Surgery Primary School Shop Access to public transport: Bus stop or route Train station	NA	NA	(Actual distances to be measured to facilities).
Potential impacts	;				
Green Belt and Landscape	Stage 2	Green Belt and Landscape impact and visual containment	Unacceptable impact of site upon Green Belt and/or landscape not capable of mitigation.	Impact capable of mitigation Potential cumulative impact with other identified sites.	No unacceptable impact on Green Belt and or landscape.
Biodiversity / Protected Species / Important hedgerow	Stage 2	Impact on biodiversity resources or known protected species Site of Special Scientific Interest Local Nature Reserve Geological Conservation Review Site Sites of Importance for Nature Conservation	Significant effect and unacceptable impact of site upon ecology or protected species or habitats not capable of mitigation where 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.



Historic environment	Stage 2	Scheduled Ancient Monuments Listed Buildings Historic Parks and Gardens Conservation Areas Heritage assets (local lists)	Significant harm to the significance of a heritage asset not capable of mitigation.	Harm to the significance of a heritage asset but capable of mitigation.	No harm to the significance of a heritage asset.
Water quality	Stage 2	Groundwater Source Protection Zone	Unacceptable risk to the supply and quality of water resources.	Risk to the supply and quality of water resources capable of mitigation.	No risk to the supply and quality of water resources.
Noise	Stage 2	Noise pollution from surrounding uses e.g. road, rail and air transport	Likely to be adversely affected by noise pollution from surrounding uses that could make for an unacceptable residential environment.	Likely to be affected by noise pollution but this is capable of mitigation.	Not affected by noise issues.
Residential amenity (Impact of site on adjoining uses)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses esp. 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 esp. residential properties but any potential impact (light, visual, other disturbance) on adjoining uses is capable of mitigation.	Unlikely to adversely affect existing adjoining uses.
Residential amenity (Impact of adjoining uses on site)	Stage 2	Relationship with existing adjacent uses	Close proximity to existing adjacent uses and any potential impact from these uses (light, visual, other disturbance) on the site is not reasonably capable of mitigation.	Close proximity to existing adjacent uses but any potential impact from these uses (light, visual, other disturbance) on the site is capable of mitigation.	Unlikely to be adversely affected by existing adjoining uses.



Developability	Stage 2	Deliverability Viability	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 contrary to spatial policy. No site constraints needing to be overcome.
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- 4.5.5 PBA have developed specific recommendations for the Council to take the evidence study forward into the preparation of policy and the identification of site allocations within the emerging District Plan. The recommendations are detailed within the following sections and seek to identify:
 - A shortlist of suitable, available and achievable sites to meet identified needs; and
 - Identification of site capacity and delivery options for all sites.

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5 Site Assessment and Capacity

- 5.1.1 East Herts District Council has commissioned an update of the previous GTAA and subsequent site assessment work to provide an up to date representation of needs and to assist in identifying sites to allocate within the District Plan. Peter Brett Associates' involvement in this process continues the work of the Accommodation Needs Assessment, by ORS, to provide a robust evidence base for Gypsy and Traveller and Travelling Showpeople's sites to inform the emerging District Plan.
- 5.1.2 All sites identified for assessment at **Stage 1**, were as outlined from the source of sites within **para 4.2.1**. This resulted in a total of 32 sites being assessed at **Stage 1**.
- 5.1.3 This included all existing authorised and unauthorised Gypsy and Traveller sites (5 sites) and Travelling Showpeople site (1 site). It also included 10 sites owned by East Herts Council identified by PBA and confirmed by the Council for consideration at **Stage 1**. 9 strategic sites and 3 broad locations identified in the draft District Plan (2014) were assessed at **Stage 1**.
- 5.1.4 As part of the District Plan process, in 2009 the Council commenced a Call for Sites exercise, inviting developers, landowners and businesses to submit sites in the local area that would be available for development over the next 15-20 years, including those potentially available for Gypsy, Traveller and Showpeople accommodation. Of the hundreds of sites submitted to the Council, two were suggested for Gypsy and Traveller sites. One of the sites, which was submitted in 2013, (The Stables), is an existing Gypsy and Traveller site. In summary, the following sites were put forward:
 - The Stables, Bayford, Bayford Lane, Hertford (SLA ref 11-003); and
 - The Water Hall Quarry Complex, Lower Hatfield Road, Hertford (SLA ref 26-001).
- 5.1.5 In March 2014, the Council undertook a follow up letter, to all promoters of Call for Sites submissions which were identified as outside existing designated settlement boundaries, to check with landowners as to whether the site could be made potentially available for Gypsy and Travellers and/or Travelling Showpeople use. Following this approach, the following sites were put forward:
 - Land north of Molewood Road, Hertford (SLA ref 03-003);
 - Land south of Owles Lane, Buntingford (SLA ref 02/001); and
 - Land at Archers Green (SLA ref 40-022).
- 5.1.6 All sites were mapped onto GIS and put into a sites database. The study therefore includes a long list of 44 sites. A map of the East Herts local authority area is contained at **Appendix B** showing the distribution of sites subject to assessment.

5.2 Capacity

- 5.2.1 In this section a list of sites is identified which are considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. All potentially suitable sites have been subject to an initial broad assessment of the number of pitches which could be provided on site. This has taken account, firstly, of:
 - Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008);



- Travelling Showpeople's Sites Model Standard Package (The Showmen's Guild of Great Britain, 2007); and
- Any relevant planning history.
- 5.2.2 In addition, Peter Brett Associates have developed templates for various forms of Gypsy and Traveller development, including for residential and transit sites. These have been used to inform the theoretical capacity of sites and optimum size and configuration of pitches (or plots) on site. On larger sites a mix of pitch sizes to reflect the needs of different families can be assumed. Relevant design templates are set out in **Appendix I**.
- 5.2.3 Site capacity has also taken account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures to achieve a suitable development. Providing good quality landscaping and access arrangements have been taken into account. This will result in sufficient access and accommodation space to create a site which Gypsy, Traveller or Travelling Showpeople find attractive. At the same time, sufficient space and landscaping will help to preserve the residential amenity of neighbouring uses. It should be noted that for strategic allocations and broad locations the capacity of sites has not been identified. Capacity will be subject to specific masterplanning and viability testing for each site and therefore has not been identified at this stage.
- 5.2.4 The shortlisted sites have been assessed for their capacity to accommodate residential uses for Gypsy and Traveller sites and mixed residential/commercial uses for Travelling Showpeople.

5.3 Stage 1 Suitability and Availability Matrix

- 5.3.1 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.
- 5.3.2 The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Appendix C**. A traffic light approach has been utilised, to identify where sites do not satisfy criteria in red, where criteria may be capable of being satisfied in yellow and where criteria are satisfied in green.
- 5.3.3 Sites identified as red have not gone forward to be assessed at **Stage 2**. 8 sites were rejected at **Stage 1** and therefore 36 sites were examined further at **Stage 2**.

5.4 Stage 2 Suitability, Availability and Achievability Site Assessments

- 5.4.1 **Stage 2** involved a more detailed assessment of suitability, availability and an examination of achievability issues.
- 5.4.2 **Appendix D** sets out those sites where it is considered there is no potential for further provision and the reasons for this decision. **Appendices E to H** set out the detailed site assessment results for those sites considered potentially suitable, available and achievable for future provision beyond and within the Green Belt.

Potential sites beyond the Green Belt

5.4.3 A total of 3 sites located beyond the Green Belt were identified as potentially available and suitable sites to contribute additional pitches towards meeting future identified needs for Gypsies and, Travellers. It should be noted that whilst suitable and available both Nine Acres (EH013) and Field Farm (EH014) have existing permissions which are sufficient to meet the



needs of the families on the sites until the end of the Plan period in 2031. Both sites have additional capacity which is not required for their own needs within the Plan period and neither wish to make the potential capacity available to meet the wider District need. Therefore these represent potential options for delivery to meet generated needs of those sites beyond the plan period. Results are set out in **Table 5.1** below.

Table 5.1: Sites with Potential beyond the Green Belt for Gypsies and Travellers in East Herts

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Further Capacity	Use
EH005	Elmfield Stables	Throcking	0	1	Gypsy and Traveller
EH013	Nine Acres	High Cross	6	2*	Gypsy and Traveller
EH014	Field Farm	Levens Green	6	1*	Gypsy and Traveller

^{*}these pitches would meet the needs of the site beyond the period of the District Plan

5.4.4 It should be noted that Elmfield Stables (EH005) is only recommended for a single touring caravan and is not considered suitable for static caravan provision. Further details on potential sites are set out in **Appendix E** and considered in **Section 6**.

Potential sites within the Green Belt

5.4.5 A total of 2 sites within the Green Belt were identified as potentially available and suitable sites to contribute additional pitches or plots towards meeting future identified needs for Gypsy, Traveller and Travelling Showpeople subject to insufficient non Green Belt sites being identified. Results are set out below:

Table 5.2: Sites with Potential within the Green Belt for Gypsy and Traveller and/or Travelling Showpeople use

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Further Capacity	Potential Use
EH001	The Stables	Bayford	8	2#	Gypsy and Traveller
EH002*	Water Hall Quarry Complex	Letty Green	0	15	Gypsy and Traveller or Travelling Showpeople

 $^{^{\}it \#}$ these pitches would meet the needs of the site beyond the period of the District Plan

- 5.4.6 All the shortlisted sites have been assessed for their potential capacity. The results are set out in **Appendix F** and considered in **Section 6**.
- 5.4.7 Esbies Estate (EH004) has not been recommended as an available and suitable site with potential for pitches within the Green Belt within this study. This is primarily due to the unacceptable impact the site has on the Green Belt along the River Stort corridor. Careful consideration has been given to use of the site and the possible lawful fall-back uses of certain plots to seasonal leisure touring caravan use. It is concluded that residential use for Gypsy and Traveller pitches would still represent an increase in impact due to the year round and permanent nature of static caravan provision.

^{*}Site EH002 is identified as suitable for both Gypsy and Traveller and Travelling Showpeople use, but could only be developed for one of the uses.



5.4.8 However, Peter Brett Associates recommend that the Council should give Esbies Estate (EH004) further consideration from a pragmatic perspective. Currently, whilst unauthorised, the site exists and a practical way forward may be to consolidate use for Gypsy and Traveller on plots in the North West Corner, away from potential flood risk areas, This combined with the restoration of the remainder of the site turning it back to open countryside, would result in a significant improvement to the integrity of the Green Belt in this location. This issue is considered further in **Section 6**.

Assessment of Strategic Locations

5.4.9 A total of 9 strategic locations have been assessed. These included all sites proposed as allocations in the Draft District Plan which either do not have an extant planning permission attached to them or do not lie within existing urban area boundaries. None of the assessed sites were identified by their promoters as being available for Gypsy, Traveller or Travelling Showpeople use **Table 5.3** sets out the potential locations which were assessed:

Table 5.3: Assessment of Strategic Locations for	potential Gypsy and Travelle	er or Travelling Showpeople Use

Site No.	Site Name (with draft District Plan Policy No.)	Settlement	Use
EH034	Land South of Buntingford (BUNT2)	Buntingford	Gypsy and Traveller or Travelling Showpeople
EH037	Land East of Manor Links (BISH6)	Bishop's Stortford	Gypsy and Traveller or Travelling Showpeople
EH038	Land South of Bishops Stortford (BISH7)	Bishop's Stortford	Gypsy and Traveller or Travelling Showpeople
EH039	Land North of West Road (West of Sawbridgeworth) (SAWB2)	Sawbridgeworth	Gypsy and Traveller
EH040	Land South of West Road (West of Sawbridgeworth) (SAWB3)	Sawbridgeworth	Gypsy and Traveller
EH043	North of Hertford (HERT4)	Hertford	Gypsy and Traveller only
EH044	South of Hertford (HERT5)	Hertford	Gypsy and Traveller
EH045	West of Hertford (HERT3) (South of Welwyn Road)	Hertford	Gypsy and Traveller or Travelling Showpeople
EH051	West of Hertford (HERT3) (North of Welwyn Road)	Hertford	Gypsy and Traveller or Travelling Showpeople

5.4.10 Strategic sites were identified as being potentially suitable, subject to masterplanning and viability testing for each site, and could provide the Council with an opportunity to make provision for Gypsy, Traveller or Travelling Showpeople as part of the policy requirements for development in the Draft District Plan. Potentially suitable strategic sites are included in **Tables 6.7** and **6.9** below. Assessments were made of all the locations in **Table 5.3** and these are included at **Appendix G.**

Assessment of Broad Locations

5.4.11 A total of 3 broad locations have been assessed. None of the sites were identified as available for Gypsy, Traveller or Travelling Showpeople use. However, all sites were identified as potentially suitable, subject to masterplanning and viability testing for each site. These provide the Council with an opportunity to make provision for Gypsy, Traveller or Travelling Showpeople a part of the policy requirements for development in the Draft District Plan.



Table 5.4: Assessment of Broad Locations for potential Gypsy and Traveller Use or Travelling Showpeople

Site No.	Site Name	Settlement	Use
EH053	Land in the Gilston Area (GA1)	Gilston	Gypsy and Traveller and Travelling Showpeople
EH054	Land North and East of Ware (WARE3)	Ware	Gypsy and Traveller and Travelling Showpeople
EH055	Land East of Welwyn Garden City (EWEL1)	Near Welwyn Garden City	Gypsy and Traveller and Travelling Showpeople

5.4.12 All potentially suitable strategic sites and broad locations are considered further in **section 6**.

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6 Recommendations and Delivery Options

6.1 Pitch and Plot Targets

- 6.1.1 'Planning policy for traveller sites' (CLG, 2012) requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, to meet likely permanent and transit site accommodation needs arising in each area.
- 6.1.2 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (ANA), completed by ORS in 2014 details the total identified need for new permanent residential Gypsy and Traveller pitches and Travelling Showpeople plots to meet residential needs between 2014 and 2031 to address the needs of all identifiable households in East Herts. The results are set out in **Table 6.1** below:

Table 6.1: ANA need for East Herts in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
Gypsy and Traveller Residential Pitches	7	1	2	2	12
Travelling Showpeople Plots	1	1	2	1	5

6.1.3 The Council is now in a position to include local targets in its emerging District Plan to reflect the pitch and plot targets identified in the study.

6.2 A Supply of Deliverable and Developable Sites

- 6.2.1 In developing the District Plan, 'Planning policy for traveller sites' (CLG, 2012) 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.
- 6.2.2 PBA recommend that to address the requirement to ensure that identified need is met throughout the Plan period, the Council consider the following:
 - Safeguarding existing sites (and providing additional pitches/plots where appropriate at those locations);
 - Allocating potential sites beyond the Green Belt;
 - Consider making provision a policy requirement within strategic and/or broad locations beyond the Green Belt; and
 - Consider allocating potential sites or making provision within strategic sites and/or broad locations within the Green Belt (if need cannot be met beyond the Green Belt).

6.3 Safeguarding Existing Sites

6.3.1 It is suggested that, as an initial starting point, the Council should consider safeguarding existing Gypsy, Traveller and Travelling Showpeople sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch and plot targets.



6.3.2 There are 3 existing Gypsy and Traveller sites with full permission within East Herts. It is recommended that these sites are safeguarded in the Draft District Plan to ensure their continued use.

Table 6.2: Safeguarding Existing Authorised Gypsy and Traveller Sites in East Herts

Site ref	Site name	Settlement	Existing Provision (including extant permissions)
EH001	The Stables	Bayford	8 pitches
EH013	Nine Acres	High Cross	6 pitches
EH014	Field Green	Levens Green	6 pitches

6.3.3 There is 1 existing Travelling Showpeople site with full permission within East Herts. It is recommended that this site is also safeguarded in the Draft District Plan to ensure its continued use.

Table 6.3: Safeguarding Existing Authorised Travelling Showpeople Sites in East Herts

Site ref	Site name	Settlement	Existing Provision
EH007	Rye House Caravan Park	Rye House, Hoddesdon	40 plots

6.3.4 From site survey it is clear that these sites are currently in use and are occupied. There appear to be no reasons on the grounds of need why these sites should not be safeguarded in the East Herts District Plan. Safeguarding these sites will prevent their loss to other uses and therefore ensure that new site provision is only required to meet future needs.

6.4 Site Delivery Options

- 6.4.1 A number of potential delivery models have been identified and considered for the potentially suitable sites and strategic/broad locations identified overleaf. These include:
 - Delivery model 1: Existing privately owned sites where there is potential for pitches/plots to be created within the existing site boundaries to meet future immediate family needs. Under this model, planning permission would be needed. The Council should consider encouraging planning applications to meet short and medium term needs through entering into dialogue with site occupants.
 - Delivery model 2: Sites which are not currently owned by the travelling communities but have been identified as available for these uses. Allocation in the emerging District Plan could identify these sites to travelling communities and they could be purchased on the open market. Alternatively, the Council could consider using New Homes Bonus or other capital monies to buy the site or identify their own public assets and then make them available to organised groups on a non-profit making basis to enable them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to provide further sites, as appropriate. There are emerging examples of innovative acquisition and funding arrangements across the country.
 - Delivery model 3: New sites where the Council considers that additional affordable pitch provision may be appropriate. In this case, the Council should investigate the potential for either buying sites, developing their public assets or work with other public providers using Government grant funding or other monies to secure or increase affordable provision. Sites could then either be managed by a Council or a Registered Providers (RP's).



Delivery model 4: Provision required as part of the planning of strategic housing or mixed use development sites/broad locations. There may be opportunity to require suitable strategic allocations/broad locations in the District Plan to provide for Gypsy and Traveller pitches or Travelling Showpeople plots as part of their overall delivery of development in these locations. These could then be either managed by the Council or RPs, sold on the open market, or affordable pitches brought forward. However, it should be noted that masterplanning and viability testing could ultimately result in some sites potentially not progressing to identification for either Gypsy and Traveller or Travelling Showpeople use in Policy HOU7 of the District Plan.

6.5 Sites with Potential (beyond the Green Belt)

6.5.1 A total of 1 site has been identified beyond the Green Belt as potentially available and suitable for Gypsies and Travellers. **Table 6.4** sets out the potential site for allocation. Details of this site are contained in **Appendix E**. However, it is important to note that this site would only be suitable for a single touring caravan and would not be suitable for permanent static accommodation.

Table 6.4: Sites with Potential beyond the Green Belt for Gypsy and Traveller Pitches in East Herts

Site Ref	Site Name	Settlement	Existing authorised pitches / plots	Extant permission for pitches / plots	Additional pitches / plots	Plots / Pitches 2014-2018	Plots / Pitches 2019-2031	Delivery option
EH005	Elmfield Stables	Throcking	0	0	1	1	0	Model 1 – private site
TOTAL					1	1	0	

6.5.2 The study has identified no sites with potential beyond the Green Belt for Travelling Showpeople.

6.6 Meeting the Needs (beyond the Green Belt)

6.6.1 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2014 (ANA) identifies a need for 12 net additional Gypsy and Traveller residential pitches to be developed by 2031. The ANA also identifies a need for 5 additional plots for Travelling Showpeople in East Herts by 2031.

Gypsy and Traveller need and supply beyond the Green Belt

6.6.2 **Table 6.5** sets out a summary of need and supply beyond the Green Belt for Gypsy and Traveller sites in East Herts.

Table 6.5: Gypsy and Traveller need and supply beyond the Green Belt in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
(a) Need for Gypsy and Traveller	7	1	2	2	12
Residential Pitches					
(b) Existing sites with potential beyond	1	0	0	0	1
the Green Belt					
(c) New sites with potential beyond the	0	0	0	0	0
Green Belt					
(d) Total potential supply (b+c)	1	0	0	0	1
(e) Shortfall/Surplus (a-d)	6	1	2	2	11



6.6.3 Peter Brett Associates consider that there is 1 existing currently unauthorised site beyond the Green Belt which may be suitable for one Gypsy and Traveller pitch (albeit for a touring caravan only). Overall this is 11 pitches short of the identified need figure of 12 for 2014-2031. This figure is also 6 pitches short of the identified need which should be delivered in the first 5 years.

Travelling Showpeople need and supply beyond the Green Belt

6.6.4 **Table 6.6** summarises the need and supply beyond the Green Belt for Travelling Showpeople for East Herts:

Table 6.6: Travelling Showpeople need and supply beyond the Green Belt in 5 year time periods

	2014-2018	2019-2023	2024-2028	2029-2031	Total
(a) Need for Travelling Showpeople Plots	1	1	2	1	5
(b) Existing sites with potential beyond the Green Belt	0	0	0	0	0
(c) New sites with potential beyond the Green Belt	0	0	0	0	0
(d) Total potential supply (b+c)	0	0	0	0	0
(e) Shortfall/surplus (a-d)	1	1	2	1	5

6.6.5 Peter Brett Associates have identified no existing or new sites beyond the Green Belt which may be suitable for Travelling Showpeople plots. Overall this is 5 plots short of the identified need figure for 2014-2031. This figure includes the 1 plot of the identified need which should be delivered in the first 5 years.

6.7 Provision via Policy within Strategic Sites beyond the Green Belt

6.7.1 There is the potential to deliver Gypsy and Traveller or Travelling Showpeople uses within the strategic sites/broad locations currently being considered within the draft District Plan. Strategic sites/broad locations have been explored for their potential to provide provision for the travelling community. **Table 6.7** sets out potential strategic site beyond the Green Belt for consideration. It should be noted that a planning application is currently under consideration by the Council for development which does not include Gypsies and Travellers or Travelling Showpeople provision. Should this application be approved, then it is unlikely that a requirement for the provision of accommodation for Gypsies and Travellers or Travelling Showpeople could be secured.

Table 6.7: Strategic Site with Potential beyond the Green Belt for Gypsy, Traveller Pitches or Travelling Showpeople Plots

Site No.	Site Name	Settlement	Phasing
EH034	Land South of Buntingford (BUNT2)	Buntingford	2016-2021

6.7.2 Subject to the outcome of the current application, this strategic site may represent an option beyond the Green Belt for consideration by the Council.

6.8 Delivery options within the Green Belt

- 6.8.1 It is clear that to meet the overall need for Gypsies and Travellers and Travelling Showpeople, the Council may have to consider sites in the Green Belt. A series of Green Belt options are set out for the Council's consideration, including:
 - Sites with potential (within the Green Belt);
 - Provision via Policy for Strategic Sites and Broad Locations within the Green Belt;
 - Esbies Estate (EH004)



6.9 Sites with Potential (within the Green Belt)

6.9.1 A total of 1 site in the Green Belt is identified as potentially available and suitable. Site EH002 is considered suitable for either Gypsy and Traveller or Travelling Showpeople, but would not be immediately available due to on-going quarrying activities on site. As highlighted earlier, sites in the Green Belt are generally considered to be inappropriate and should only be allocated by the Local Planning Authority when insufficient sites in non-Green Belt locations can be identified to meet locally defined needs. **Table 6.8** below sets out the potential sites within the Green Belt.

Table 6.8: Sites with Potential within the Green Belt for Gypsy and Traveller Pitches or Travelling Showpeople Plots

Site Ref	Site Name	Settlement	Existing authorised pitches / plots	Extant permission for pitches / plots	Additional pitches / plots	Plots / Pitches 2014-2018	Plots / Pitches 2019-2031	Delivery option
EH002*	Water Hall Quarry Complex	Letty Green	0	0	15	0	15	Model 2 or 3 – Private or Public Site
TOTAL					15	0	15	

^{*}Site (EH002) could be used for either Gypsy and Traveller or Travelling Showpeople use, but not both.

6.9.2 It should be noted that site EH002 is potentially suitable for either Gypsy and Traveller or Travelling Showpeople use. Subject to the identified needs the Council could choose to allocate the site for either use, but not both. Details of this site are contained in **Appendix F**.

6.10 Provision via Policy for Strategic Sites or Broad Locations within the Green Belt

6.10.1 As set out above, the Council has an option to make the provision of Gypsy and Traveller or Travelling Showpeople uses a policy requirement within strategic sites and broad locations currently being considered within the draft District Plan. Strategic sites/broad locations have been explored within this report for their potential to provide provision for the travelling community. Table 6.9 sets out potential strategic sites and broad locations within the Green Belt.

Table 6.9: Strategic Sites or Broad Locations with Potential within the Green Belt for Gypsy, Traveller Pitches or Travelling Showpeople Plots

Site No.	Site Name	Settlement	Phasing
EH037	Land East of Manor Links (BISH6)	Bishop's Stortford	2016-2021
EH038	Land South of Bishops Stortford (BISH7)	Bishop's Stortford	2016-2026
EH039	Land North of West Road (West of Sawbridgeworth) (SAWB2)	Sawbridgeworth	2016-2021
EH040	Land South of West Road (West of Sawbridgeworth) (SAWB3)	Sawbridgeworth	2016-2021
EH043	North of Hertford (HERT4)	Hertford	2021-2026
EH045	West of Hertford (HERT3) (South of Welwyn Road)	Hertford	2016-2021
EH051	West of Hertford (HERT3) (North of Welwyn Road)	Hertford	2016-2021
EH053	Land in the Gilston Area (GA1)	Gilston	2021-2031
EH054	Land North and East of Ware (WARE3)	Ware	2021-2031
EH055	Land East of Welwyn Garden City (EWEL1)	Welwyn Garden City	2026-2031



- 6.10.2 PBA included 13 strategic sites/broad locations within the Stage 1 assessment. At Stage 2 PBA contacted promoters/landowners of suitable strategic sites/broad locations regarding the availability of the sites for Gypsy and Traveller or Travelling Showpeople development. Whilst promoters stated that sites are unavailable, which would normally preclude the identification of sites due to an unwilling landowner, PBA consider that the allocation of suitable strategic sites/broad locations for development within the District Plan is the key availability consideration in this instance. Development sites should be allocated to meet all the needs of the Local Planning Authority, including housing, employment, retail and Gypsy, Traveller and Travelling Showpeople sites. Therefore, if the Council has a defined need that is unmet, it would be logical that, subject to masterplanning and viability testing considerations, sufficient strategic sites/broad locations, especially ones beyond the defined urban areas, are identified to meet all needs, including those of the travelling community.
- 6.10.3 Therefore, to meet the identified need, Gypsy and Traveller and Travelling Showpeople sites could be required to be provided within suitable housing sites as part of the policy provisions of the District Plan. A number of authorities around the country are now planning for future Gypsy and Traveller provision through this delivery option (most recently Teignbridge District Council) and it is recommended that the Council work with developers/promoters to ensure that Gypsy, Traveller and Travelling Showpeople uses are appropriately designed into each scheme and effectively delivered within strategic sites/broad locations.
- 6.10.4 This approach would require the Council to work with site promoters to establish if sites could be successfully incorporated within site masterplans and layouts. It would also require the Council to consider the financial impact that provison may have on sites and ensure the viability is considered to determine if strategic sites and broad locations would also be able to deliver other key policy requirements, such as provision of affordable housing. It is therefore recognised that masterplanning and viability testing could ultimately result in some sites potentially not progressing to being identified for either Gypsy and Traveller or Travelling Showpeople use within Policy HOU7 of the District Plan.

6.11 Esbies Estate (EH004)

- 6.11.1 Esbies Estate (EH004) is a currently unauthorised site located on the edge of Sawbridgeworth The site is located within the Green Belt and is divided into a series of separate plots off the main access road. The site has a complicated planning history and has not been identified by Peter Brett Associates as a suitable site for the Council's consideration. The primary reason for this is the sites location within Green Belt. It is considered that the site would form a valuable part of the Green Belt in this location and performs well in terms of the defined NFFP purposes of the Green Belt. The site effectively forms part of a wider Green corridor along the River Stort.
- 6.11.2 Peter Brett Associates have carefully considered the planning history of the site, particularly the potential lawful fall back uses for several plots to seasonal leisure touring caravan use. Several plots may still have a lawful planning use for seasonal leisure touring caravan use, between April and October, but year round occupation for Gypsy and Traveller use involving the provision of static caravans on the site, would still result in an unacceptable impact on the Green Belt when compared to the potential lawful fall back use.
- 6.11.3 It is, however, considered that, whilst unauthorised the continued presence of the site is undermining the integrity of the Green Belt in this location and this should be addressed, a pragmatic approach may be for the Council to work with existing land owners to consider the rationalisation of provision and the restoration of the remaining site, returning it to open countryside.



- 6.11.4 It is suggested that the most suitable part of the site to be used for Gypsy and Traveller accommodation is the area located in the north west part of the site. This area is located outside areas of potential flood risk (zone 3), and lies adjacent to the built up area. Some of the plots concerned may have lawful fall back use for residential caravans and it is recommended that the views of a planning lawyer may be required to establish a definitive view on the lawful use of sites, as several plots appear to have been used to interim unauthorised uses prior to the unauthorised Gypsy and Traveller use, effectively removing any lawful fall back use.
- 6.11.5 PBA consider that this potential option will require the co-operation of existing landowners and is likely to have financial implications for the Council in terms of legal work and remediation costs that would be required to rationalise the site and restore the remainder of the site to open countryside. This option is considered to offer a number of benefits for the Council, including:
 - Allowing the authority to meet its statutory duty, to identify sites (especially within the first five years) and support the adoption of a sound District Plan;
 - Potentially reduced costs compared with the cost of enforcement, eviction/land purchase and restoration, which are likely to be incurred if the existing unauthorised site is to be removed entirely.

6.12 Delivery and Distribution of Sites

- 6.12.1 It is recommended that the Council should use a priority approach to safeguarding and allocation of potentially suitable sites. PBA recommend that the Council meets the need for Gypsy, Traveller and Travelling Showpeople provision in the following order:
 - I. Safeguard existing sites to prevent their loss to other uses and increase the identified pitch/plot requirement for the District;
 - II. Allocate new sites and/or provision as part of strategic sites/broad locations (beyond the Green Belt):
 - III. Allocate provision as part of strategic sites/broad locations (within the Green Belt).
 - IV. Allocate existing sites for intensification within the Green Belt (within existing permitted boundaries); and
 - V. Allocate new sites within the Green Belt.
- 6.12.2 It is recommended that the Council strives to provide suitable new sites and sites within strategic sites/broad locations (beyond the Green Belt) for new Gypsy, Traveller and Travelling Showpeople provision in the first instance.
- 6.12.3 Peter Brett Associates consider that the distribution and delivery of provision across the District are important and therefore the selection of site options by the Council should also be guided by the following principles;
 - **Fit with needs**: e.g. location of current needs, existing provision and needs of different travelling communities;
 - **Viability and timing of delivery of sites**: e.g. financial viability, provision of other policy requirements such as affordable housing and delivery within the first 5 years.
 - How potential sites relate to spatial strategies: e.g. settlement hierarchy, relationship
 of sites to sustainable settlements and accessibility to key services;



- 6.12.4 The fit with needs is an important consideration and, unlike the housing market, the small scale of need and supply can in some instances require the consideration of the needs of specific families and the appropriate form and location of provision to meet those needs. PBA are aware of Local Authorities where specific needs remain unmet, whilst sites remain vacant because the sites provided are inappropriate to meet specific needs. Peter Brett Associates recommend that the provision of pitches and plots for Gypsies and Travellers and Travelling Showpeople sites should be managed to ensure a good fit with identified need and enable delivery.
- 6.12.5 Viability, capacity and delivery of sites, especially strategic sites/broad locations is a critical consideration for the Council. The study has been unable to identify sufficient specific sites beyond the Green Belt and the Council may be reliant on provision as part of strategic sites/broad locations to meet needs in the first 5 years and beyond. Delivery of provision as part of these sites will need careful consideration to determine capacity and ensure that both site viability and implementation of Council policy, such as affordable housing or code for sustainable homes requirements are not undermined. Moreover, it is noted that none of the proposed allocated sites or broad locations can currently be considered as having 'available' status and therefore a policy requirement in the District Plan would need to be introduced to ensure delivery in particular areas.
- 6.12.6 In meeting the 5 year requirements, the Council will need sites phased for delivery over the 2016-2021 period to bring forward the Gypsy, Traveller and Travelling Showpeople element of the development before 2019 and also to meet longer term needs in the Plan period between 2019 and 2031. This will require further investigation of both viability and delivery to ensure that site options selected by the Council are both viable and deliverable if they are to contribute towards the Council meeting its statutory requirement to identify sufficient sites.
- 6.12.7 The relative accessibility of sites and proximity to the main towns and key services should be considered by the Council when selecting sites. The level of provision for Gypsy and Traveller (12 pitches) and Travelling Showpeople (5 plots) over the plan period is relatively small compared to the level of provision for other uses such as residential, but the Council should still plan for sustainable development where possible.

6.13 Criteria Policy

- 6.13.1 To potentially meet any need later in the plan period (e.g. 5 to 15 years) and to provide a base for considering all planning applications, the District Plan needs to include a criteria policy. Draft Policy HOU7 of the Draft District Plan includes a good criteria policy for assessing planning applications. As explained in the Preferred Options Consultation 2014, the policy needs to be expanded to incorporate targets, as set out in the ANA.
- 6.13.2 Given the extent of the Green Belt in East Herts it is recommend that the Council identifies sufficient sites to meet defined needs over the whole plan period to 2031 rather than relying on the criteria policy to meet needs between 2019-2031. Once adopted the newly defined Green Belt will continue to be a significant constraint to planning applications for Gypsy, Traveller and Travelling Showpeople use on sites that have not been identified and allocated in the District Plan.
- 6.13.3 If the Council were to identify and allocate only a five year supply; e.g. the minimum national policy requirement, they would restrict the remaining provision for plan period to sites beyond the newly defined Green Belt. The risk with this strategy is that unless sites beyond the Green Belt come forward or are identified by the Council in future evidence reviews on this issue then, the Council will be unable to meet requirements to provide sites in the future and could potentially be in a weaker position to deal with unauthorised sites.
- 6.13.4 The National Planning Policy Framework is clear that when defining Green Belt boundaries local Authorities should "satisfy themselves that Green Belt boundaries will not need to be



altered at the end of the development plan period" (NPPF para 84). The NPPF also considers development for Gypsy, Traveller and Travelling Showpeople use in the Green Belt as inappropriate The Council should therefore consider the allocation of sites and provision within strategic sites/broad locations within the Green Belt in the District Plan to meet the needs over the whole plan period 2014-2031. This would ensure that:

- All the Districts defined needs are addressed in the District Plan;
- The travelling and settled communities would have certainty on the location of future sites:
- The Council would be in a stronger position to deal with unauthorised sites and encampments;
- Provision would have a better fit with the needs and current provision, which is generally located in the southern half of the District (within the Green Belt); and
- Provision would have a better fit with the Council's spatial strategy which seeks to direct development towards sustainable sites with good access to main towns and key services (which are generally located in the Green Belt).
- 6.13.5 PBA have amended the Draft Policy HOU7 to reflect the findings the needs assessment and this report, to include:
 - Targets for Gypsy and Traveller and Travelling Showpeople uses;
 - Allocate potential sites;
 - Safeguarding of existing sites;
 - Criteria for assessing all Gypsy, Traveller and Travelling Showpeople planning applications.
- 6.13.6 PBA would also recommend that the Council include a requirement for Gypsy, Traveller and/or Travelling Showpeople use within strategic or Broad Locations. This could be included with in the specific policy for each site or an overall policy for strategic/broad locations.

Revised Policy HOU7 'Gypsies and Travellers and Travelling Showpeople'

I. To meet the identified need, **12** pitches for Gypsies and Travellers and **5** plots for Travelling Showpeople will be provided within the District at the following locations:

Site name	Settlement	Provision	Use	Timescale			
Elmfield Stables	Throcking	1 pitch	Gypsy and Traveller	2014-2018			
Council to insert additional sites to meet needs							

II. The following existing sites for Gypsy, Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need:



Site name	Settlement	Existing Provision	Use
The Stables	Bayford	8 pitches	Gypsy and Traveller
Nine Acres	High Cross	6 pitches	Gypsy and Traveller
Field Green	Levens Green	8 pitches	Gypsy and Traveller
Rye House	Hoddesdon	40 plots	Travelling Showpeople

- III. In order to identify exact locations within the areas allocated to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople listed above, and to assess suitability where planning applications are submitted for non-allocated sites, the following criteria should be satisfied:
 - (a) the site is in a sustainable location in terms of accessibility to existing local services;
 - (b) the site is suitable in terms of vehicular access to the highway, parking, turning and road safety and servicing arrangements and has access to essential services such as water supply, sewerage, drainage, and waste disposal;
 - (c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches proposed:
 - (d) the proposal is well related to the size and location of the site and respects the scale of the nearest settled community;
 - (f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of local residents by reason of on-site business activities, noise, disturbance or loss of privacy;
 - (g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;
 - (h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;
 - (i) within nationally recognised designations, proposals would not compromise the objectives of the designation.
- IV. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for residential provision and the storage and maintenance of equipment. All other proposals for mixed residential and business activities will be assessed on a site specific basis, taking the above criteria into account.
- V. The New traveller sites (whether temporary or permanent) in the Green Belt are inappropriate development and will not be approved except in very special circumstances.
- VI. Any development granted under this policy will be subject to a condition limiting occupation to Gypsies and Travellers or Travelling Showpeople, as appropriate.
- VII. All existing authorised sites for Gypsies and Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.

6.14 Cross boundary working

6.14.1 The Council has a duty to co-operate with adjacent authorities and, given the difficulty identifying sites for Gypsy, Traveller and Travelling Showpeople use across the Country, PBA



- would encourage the Council to work with neighbouring local authorities to potentially cooperate on the provision of both Gypsy and Traveller and Travelling Showpeople sites.
- 6.14.2 The needs of Gypsies, Travellers and Travelling Showpeople do not stop at local authority boundaries and the potential for the delivery of all types of sites (especially public sites) should be explored across these boundaries through the Duty to Cooperate, where appropriate. This is particularly pertinent for adjacent authorities that are also constrained by Green Belt.
- 6.14.3 The timing of evidence review is the key consideration for cross boundary working and the production of site assessments to identify specific sites is crucial. East Herts should liaise with adjacent authorities, especially those that have undertaken site work to establish if there are site opportunities that could meet the needs of the travelling community across boundaries. The lack of available opportunities to provide Gypsy and Traveller and Travelling Showpeople's accommodation in East Herts in areas beyond the Green Belt are a material consideration in this respect.
- 6.14.4 The duty to co-operate is not the duty to accept, so the Council will have to be satisfied that adjacent authorities have undertaken robust assessments of both needs and sites to ensure they are not unnecessarily aiding any local authority to avoid providing sites within its own area. Crucially, the very definition of the travelling community, would suggest that this planning use is in fact very cross boundary in nature and Peter Brett Associates would encourage all local authorities to resist the political sensitivities that can prevent the provision of suitable sites.

6.15 Transit Site Provision

6.15.1 There are currently no transit sites in East Herts; however, there are two transit sites provided elsewhere in the county, where the police could direct unauthorised encampments, subject to vacancies. There appear to be no major problems relating to unauthorised encampments in East Herts. The Accommodation Needs Assessment (ANA) does not identify a need for future transit provision in the district.

6.16 Funding

- 6.16.1 The Government has identified that it is focusing on incentivising councils to deliver new housing, including traveller sites. 'Planning policy for traveller sites' (CLG, March 2012) identified three potential sources of funding for local authorities:
- 6.16.2 Firstly, the New Homes Bonus scheme which operates in the same way for traveller sites as for other forms of housing. Namely, for every new pitch, a local planning authority will get six years of matched Council Tax funding, with an extra supplement for affordable pitches (such as sites owned or managed by local authorities and Registered Providers).
- 6.16.3 Secondly, the Homes and Communities Agency (HCA) has allocated £1.7bn, as part of its National Affordable Housing Programme for 2015-18, to fund the provision of affordable housing, including traveller sites. The Homes and Communities Agency has launched its prospectus inviting housing associations, councils, developers and others to bid for a share of grant funding for delivery of new affordable housing outside London. Bids will only be accepted for the provision of new traveller pitches and as with other types of accommodation, the Government does not expect to receive bids for schemes on Green Belt land or other land with special environmental protections.
- 6.16.4 A proportion of the £1.7bn funding will be retained for future bids through ongoing Market Engagement. This will allow organisations to take the longer timeframes they need to submit funding bids where schemes had not been fully worked up by 30 April 2014 when the formal bid round closed. The HCA website confirms that bidding for further allocations will reopen for



- continuous market engagement in due course. The HCA approach will encourage bidders to bring forward a higher proportion of firm and realistically deliverable schemes at the outset as it will allow them the flexibility to respond to development opportunities as these arise.
- 6.16.5 Thirdly, the introduction of the Community Infrastructure Levy (CIL) could provide a further potential funding source for enabling works required to deliver Council priorities, should the Council choose to introduce a CIL for the East Herts area.

6.17 Delivery and Management

- 6.17.1 As identified at the workshop, it is difficult to find organisations willing to manage public sites in Hertfordshire. The County Council is no longer taking on any new sites and Local Authorities are not currently showing any appetite to manage sites. PBA are also unaware of any Registered Providers managing any sites in the County.
- 6.17.2 There is no affordable public site provision currently in East Herts. There are 140 families on the waiting list for a public site in Hertfordshire. The (ANA) does not specify the need for affordable public provision as all the households identified as being in need in the study are all seeking private sites; however, the Council must remain aware that, should this type of site be required in the future, it should consider putting measures in place to enable public delivery.
- 6.17.3 Riversmead and South Anglia (Circle Group) currently manage all Council housing in East Herts and could be best placed to help deliver and manage sites, working in partnership with the County Council and local authorities. It is recommended that the Council discuss the potential delivery and/or management of Gypsy, Traveller and Travelling Showpeople Sites with these PRs, to determine if this is an option.
- 6.17.4 There is also the potential for the County Council to resume taking on additional public sites, but this would need a co-ordinated and well evidenced support from the local authorities within Hertfordshire to approach the County Council to influence a policy change in this respect.
- 6.17.5 The Homes and Communities Agency (HCA) is also a potential partner to deliver sites. The study has not been made aware of any HCA owned sites within East Herts, but in other Local Authority areas, the HCA works with Councils to deliver new sites.
- 6.17.6 There are also emerging examples within the country of local planning authorities planning for the future provision of sites for travelling communities by allocating urban extension sites for housing and traveller pitches, requiring developers to design and layout serviced pitches/plots for private sale to Gypsies, Travellers or Travelling Showpeople. Where there is a demonstrable need for provision, some local planning authorities are identifying a need for developers to provide pitches/plots or commuted sums as part of the overall benefits package required for new development sites. Peter Brett Associates have worked with Mid Sussex Council, who have specifically set out this requirement in adopted policy for a future urban extension.
- 6.17.7 There are also innovative delivery models being developed in other parts of the country, such as Elim Housing in West of England, which could provide for the funding of initial sites to be recycled to provide for further sites, in the same way as affordable housing has been delivered by housing bodies for some years. For example, the Council could consider using New Homes Bonus or other monies to buy a site or identify their own public assets and then make them available to organised Gypsy and Traveller groups on a non-profit making basis for them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to be recycled to provide further sites.
- 6.17.8 The Council should investigate these sources of funding and delivery options further, in partnership with the Registered Providers and other delivery partners.



6.18 Phasing and Monitoring

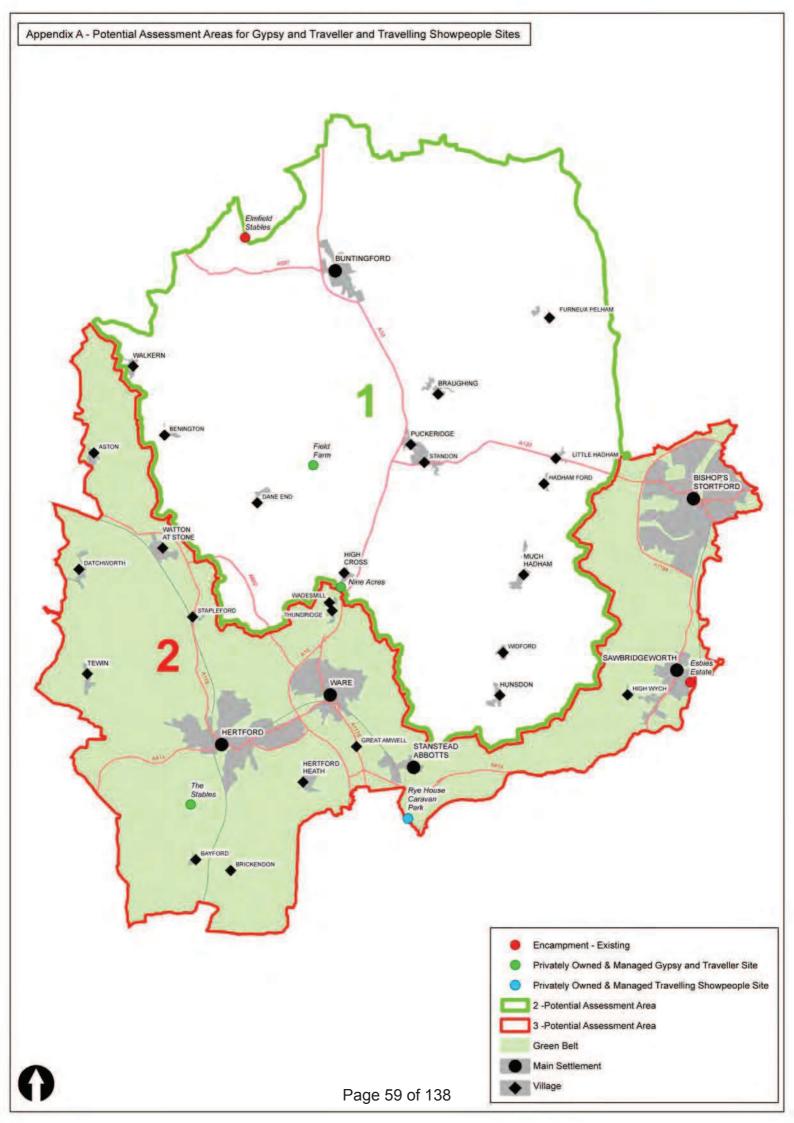
- 6.18.1 As with other forms of development, the release of Gypsy, Traveller and Travelling Showpeople sites should be managed to ensure that it corresponds with identified need.
- 6.18.2 The Council could potentially identify sufficient sites to meet needs within the plan period dependant on the outcomes of consideration of options for delivery within the Green Belt. It will be necessary to revisit the identification of sites if sites prove to be undeliverable. Peter Brett Associates suggest that it would be prudent for the Council to identify a potential reserve of sites or extension of existing sites which could be brought forward in the future if required, rather than wait for the need to be established and then start a review of the development plan at that time.
- 6.18.3 Once the Council has identified and allocated enough sites, active monitoring of supply against need on an annual basis, as required by 'Planning policy for traveller sites', would determine the need for any potential release of land to meet future needs. To ensure that it is able to demonstrate that it has an up to date understanding of local needs, the Council should also undertake periodic review of its needs evidence base via an updated Accommodation Needs Assessment.

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- 0 - 3



Appendix A Potential Assessment Areas

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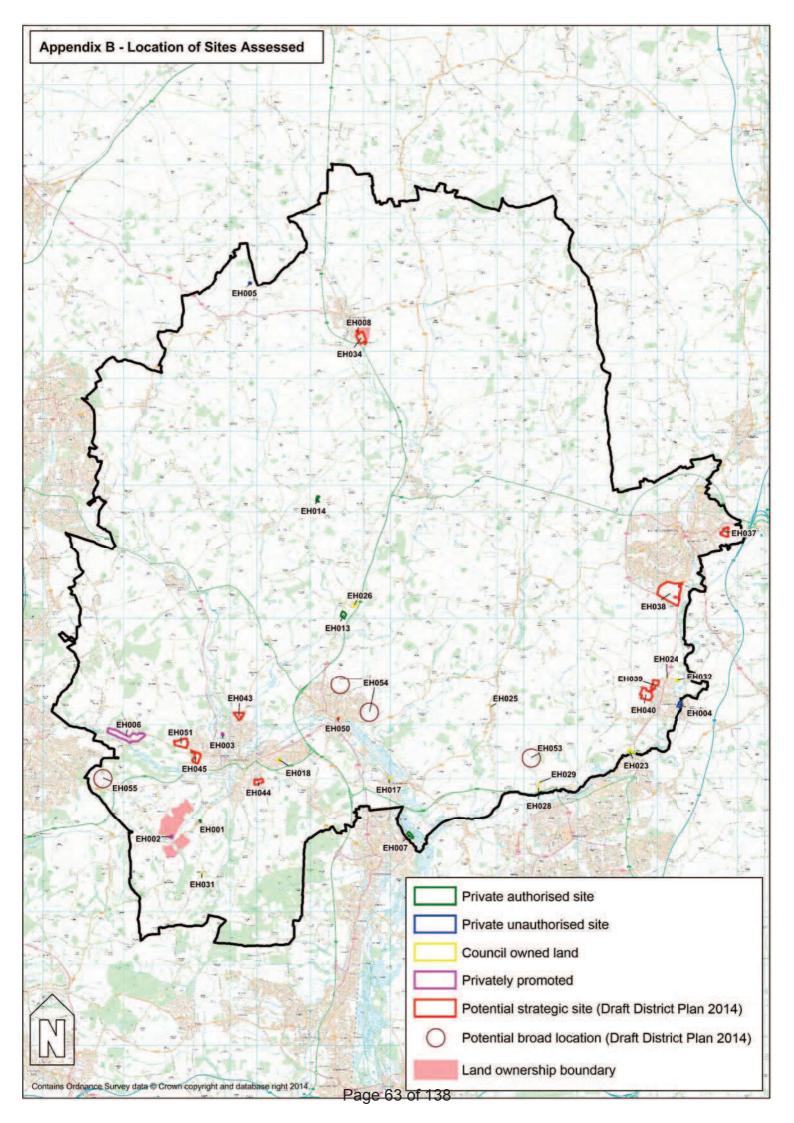


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Appendix B Sites Location Map

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Appendix C Desktop Assessment Matrix - Stage 1

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Site details		Suitability						Availability	Conclusion			
Site ref	Site name and address	Site area (ha)	Source	Flood Zone	Environmental Designations	Green Belt and Landscape	Contamination or unstable Land Issues	Noise Issues	Residential Amenity	Historic Environment	Availability for G+T Use	Should the site be considered further?
EH001	The Stables, Bayford Lane, Bayford	0.28	Private authorised site									Yes
EH002	Water Hall Quarry Complex, Letty Green	127.46	Privately promoted									Yes
EH003	Land north of Molewood Road, Hertford	0.47	Privately promoted									Yes
EH004	Esbies Estate, Sawbridgeworth	1.97	Private unauthorised site									Yes
EH005	Elmfield Stables, Throcking	0.30	Private unauthorised site									Yes
EH006	Land at Archers Green	29.37	Privately promoted									Yes
EH007	Rye House Caravan Park	2.40	Private authorised site									No
EH008	Land south of Owles Lane, Buntingford	12.24	Privately promoted									Yes
EH013	Nine Acres, High Cross	3.03	Private authorised site									Yes
EH014	Field Green, Levens Green	1.31	Private authorised site									Yes
EH017	Land at Amwell Lane, Stanstead Abbotts	+	Council owned land									No
EH018	Land at Braziers Field, Hertford	0.58	Council owned land									Yes
EH023	Harlow Mill, Harlow Road, Harlow	1.07	Council owned land									No
EH024	Land on Cambridge Road, Sawbridgeworth	0.04	Council owned land									No
EH025	Land between 50-52 Widford Road, Ware	0.05	Council owned land									Yes
EH026	Land at Poplar Close, High Cross	0.96	Council owned land									Yes
EH028	Land at Park Cottages, Eastwick	0.28	Council owned land									Yes
EH029	Land adjacent 11 Roseley Cottages,	0.07	Council owned land									Yes
EH031	Land to the rear of 4 & 4a Ashendene Road, Bayford	0.12	Council owned land									Yes
EH032	Land east of Reedings Way, Sawbridgeworth	0.92	Council owned land									Yes
EH034	Land South of Buntingford	10.2	Strategic site									Yes
EH037	East of Manor Links, Bishop's Stortford	6.24	Strategic site									Yes
EH038	Land South of Bishops Stortford (Sub Area A)	54.12	Strategic site									Yes
EH039	Land North of West Road (West of Sawbridgeworth)	5.89	Strategic site									Yes
EH040	Land to the south of West Road (West of Sawbridgeworth)	14.13	Strategic site									Yes
EH043	North, Hertford	5.96	Strategic site									Yes
EH044	South, Hertford	4.9	Strategic site									Yes
EH045	West of Hertford (North of Welwyn Road)	8.83	Strategic site									Yes

Site details				Suitability						Availability	Conclusion
Site ref		Site area (ha)	Source	Flood Zone	Environmental Designations	II andscape	Contamination or unstable Land Issues	Noise Issues	Historic Environment	Availability for	Should the site be considered further?
EH051	West of Hertford (South of Welwyn	11.88	Strategic site								Yes
EH053	Gilston area	-	Broad location								Yes
EH054	North and East of Ware	-	Broad location								Yes
EH055	East of Welwyn Garden City	-	Broad location								Yes



Appendix D Sites with No Potential - Stage 2

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Site ref	Site name	Settlement				
EH003	Land North of Molewood Road		Hertford			
Site address		Local authority		Size (ha)		
		East Herts Council		0.5		
Description of site						
The site is a green field which is slightly overgrown and slopes gently from south to north. The site is situated within a rural area on the edge of Hertford, adjacent large residential properties. There is a tree on the right side of the entrance. There is also a historic house located to the south of the site which is located within a Conservation Area. It is located at the end of Molewood Road, a private narrow lane which has a couple of tight corners, and accessed via a residential road.						
Source: current una	uthorised	te 🗌 Source: public owned	land			
Source: current auth	_	Source: call for sites	iana			
✓ Source: privately pro	_					
Planning history There is no known relevant p	planning history					
AVAILABILITY						
The site was promoted to the Council for development and assessed in the Strategic Land Availability Assessment. Subsequently the landowner has confirmed that the site is potentially available for Gypsy, Traveller or Travelling Showpeople use.						
SUITABILITY						
Policy constraints						
The very southern edge of the site is within flood zone 3. There is a Conservation Area adjacent the site to the south. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt						
Physical constraints						
The site slopes and would need to be levelled for caravans. Highways - Category: Red: The site is accessed via the public right of way network (Hertford footpath 095), which links onto Molewood Road at the south. The approach road to the site is initially quite narrow with no passing places, and therefore users of the right of way network may be inconvenienced by oncoming vehicles. Closer to the site, the access road opens out to double width. Molewood Place, to the north of the site, is a private cul-de-sac sloping down towards the site. Vehicles can travel along here at quite a high speed for the environment as a result, and therefore, the site access is unlikely to be able to provide a sufficient level of visibility in a northerly direction, unless it can be demonstrated that land need for a visibility splay is within the applicant's ownership, and that traffic claming measures along Molewood Place can be put in place. A very small number of plots at the site may be difficult to refuse on highway grounds, but in general, a development at this location would justify an objection on the grounds of compromising the safety and convenience of users of the public right of way network. It should be noted that the site is fundamentally unsuitable for traffic associated with travelling showpeople.						
Accessibility to services:						
The nearest GP is 1.1 kilometres away. The nearest primary school is within 550 metres. The site is within 1.4 kilometres of the nearest shops. The nearest bus stop is 270 metres away. Hertford North train station is 760 metres away.						
Landscape Impacts						
Site consists of an area a moderately sloping unmanaged land (former piggery with little evidence of any structures remaining) which is being colonised by trees and scrub, that lies south of a group of houses accessed off a private drive. A railway line forms the western boundary and a tree-lined track below the site to the south is followed by the Hertfordshire Way. Access is via a single track lane						

Site consists of an area a moderately sloping unmanaged land (former piggery with little evidence of any structures remaining) which is being colonised by trees and scrub, that lies south of a group of houses accessed off a private drive. A railway line forms the western boundary and a tree-lined track below the site to the south is followed by the Hertfordshire Way. Access is via a single track lane through woodland, past a distinctive group of buildings and over a narrow bridge; these features and a small stream (River Beane), creates a distinctive and discreet sense of place that belies its close relationship with the northern edge of the town. The site adjoins a Conservation Area and is not included within the Landscape Character Assessment (being deemed to be part of the urban area) but adjoins the Lower Beane Valley LCA where the landscape strategy is to 'conserve and strengthen' the landscape; this strategy would also be equally appropriate in this area. The site, whilst apparently moderately discreet, contributes to the 'soft' and distinctive edge of the urban area and any development would be most out of place as well as potentially having significant adverse effects on the sense of place, the amenity of the Hertfordshire Way (which also follows the access lane), and the setting of the Conservation Area.

Green Belt Comments				
The site is located within Green Belt. As such any development would lead to a reduction in openness and constitute an encroachment into open countryside.				
Other Potential Impacts				
The site is adjacent existing residential properties and would potentially impa	act on the amenity of these proporties.			
The site is adjustent existing residential properties and mean petermany,	act off the affermey of those properties.			
ACHIEVABILITY				
The site is not suitable and therefore unachievable.				
Conclusion				
Development on this site would have an unacceptable impact on the landsca	ape and on the purposes of the Green Belt. The site is also			
unsuitable on highways grounds.				
A	DELIVERY			
	Potential Yield			
	2014 - 2018 0			
100 less	2019 - 2023 0 2024 - 2028 0			
H / ME	2024 - 2028 0 2029 - 2031 0			
	2029 - 2031 0 2031 + 0			
	Potential occupants			
	Potential occupants			
	Type of use			
	777			
	Delivery model			
	 Existing private site for either permanent authorisation, intensification or extension to meet family needs 			
	Existing private site for intensification or extension to meet wider needs of communities			
	New private site for development			
	Existing public site for intensification or extension			
mer than	New public site for development			
7 300	New site to be developed as part of an urban extension			
Site boundary				
Land ownership	Existing site requiring planning permission			
Land Ownership				
This map is reproduced from the Ordnance Survey map by Peter Brett Associates				

Site ref	Site name		Settlement		
EH004	Esbies Estate				
Site address	1	Local authority	Size (ha)		
Ollo addiooc		East Herts Council	2.0		
Description of site					
Description of site This is an existing unauthorise	ised Gypsy and Traveller site and is split	into a number of plots (1 - 46). So	me of the plots are currently in		
use for Gypsy and Traveller	purposes and other plots are vacant. Ac	djacent to the site are existing resid	lential properties; the River Stort		
to the east and green space	to the north and south. The site has goo	00 Vehicle access from the existing	nignway.		
✓ Source: current una		ta 🖂 Cauraar public awaad l	الم مد ما		
Source: current unau	_	•	and		
Source: privately pro		_			
Planning history					
None of the plots on this site	e have planning permission for full resider				
	previous permissions on the site for sease ered as fall back uses, whislt others would				
commerical storage in the in	iterim period. PBA would recommend a p				
have a lawful fall back use of	f seasonal leisure use.				
AVAILABILITY					
	Gypsy and Traveller use. The same plo				
available for Gypsy and Trav	veller use, although it has not been possil	ble to confirm availability with the ir	ndividual plot owners.		
SUITABILITY					
Policy constraints The southern part of the site (plots 22-31) is within flood zone 3 and not suitable for Gypsy and Traveller use. The remaining plots are					
within flood zone 2. There is a Conservation Area adjoining the site to the east and north of the site, and the whole site is within the					
Green Belt. Local Plan (2007) policies: H	HSG16 Accommodation for Gypsies; GB0	C1 Appropriate Development in the	Green Belt		
Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt					
Physical constraints					
Physical constraints ORS estimate there are 4/5	families with Gypsy and Traveller backgr	round on site.			
Highways - Category: Green	n: The site currently accommodates sever	eral traveller plots, and is accessed			
	ext to The Forebury. Station Road is a C vidth (5.1 metres wide for its initial stretch				
restricted in an easterly direct	ction. Visibility in a westerly direction is re	elatively good. The eastern side of	the access road has a very tight		
*	al right turn facility into the access. This one is from the opposite direction passes by one the composite direction passes by the composite direction passes by the composite direction passes.	0 1	,		
			_		
some minor access improve	commodate the traveller plots that are cu ements. A more significant intensification	of use of the access (either in term	ns of increased trip movements		
or larger vehicle types association a right turn facility on Station	ciated with travelling showpeople) would I	likely require more extensive modifi	ications, such as the inclusion of		
a fight turn racinty on otation	a right turn facility on Station Road.				
Accessibility to services:					
The site is well located in sustainability terms, being located around 250 metres from Sawbridgeworth Station and 150 metres from the					
nearest bus stop, and with good proximity to local amenities: nearest GP is within 600 metres, primary shool is within 400 metres, shops are within 500 metres.					
are within 500 metres.					
Landscape Impacts					
	valley floor between houses off Forebury				
	development, that separates the undevel e landscape through the town. The site is				

number of which contain caravans (touring and static) or park homes, accessed off a lane to the north. Parts of the site are visible from outside, primarily from the river and land on the east side where caravans, lighting and boundary fencing are apparent. A footpath runs along the west bank and there are glimpses into parts of the site; close barded fencing erected along the edge of the path also impacts adversely on the enjoyment of the route. The Landscape Character Assessment identifies the site as part of the built up area.

Green Belt Comments

The site is situated in Green Belt and has had a tangible effect on openness by obstructing the continuity of the riverside landscape, and effectively merging the developments on either side, and encroaching into what was undeveloped countryside. Further development will only exacerbate and intensify these adverse effects. The development is clearly contrary to Green Belt purposes. Some Plots on the site have previous permissions for seasonal leisure caravan use; consequentially this permitted use will have a seasonal effect on the openness of the Green Belt and the perception of the area as part of the river corridor running through and sub-dividing the settlement. The potential lawful fallback uses effect on Green Belt openness is already 'accepted'. Clearly the current unauthorised use of the site has increased the adverse effect on openness with extensive surfacing, boundary fencing, and associated lighting associated with the subdivision of the area into numerous plots. There may be scope to rationalise and formalise the position by the removal of some plots for seasonal use in compensation for allowing a small area of permanent G&T use within the site, such that the overall net effect compared to the permitted use can be shown to lead to a tangible improvement in openness of the Green Belt in this area. This would need to involve the 'compensatory' restoration of a significant area of land to re-establish openness. This open area should be within the eastern part of the site where it would contribute to opening up and restoring the riverside landscape and amenity of the riverside footpath, with any development being limited to the north western part of the site.

Other Potential Impacts

The southern part of the site (plots 22-31) is within flood zone 3 and not suitable for Gypsy and Traveller use. The remaining plots are within flood zone 2.

ACHIEVABILITY

The whole site is not suitable for Gypsy and Traveller use and therefore not achievable. Potential delivery would require the rationalisation of use on the site (subject to the establishment of which plots have lawful fall back uses to seasonal leisure caravan use) and the remediation of a large part of the site which could involve considerable cost.

Conclusion

Development on this site would have an unacceptable impact on the purposes of the Green Belt, and therefore is not suitable for Gypsy and Traveller uses. Several plots on the site may have lawful fall back use to previous planning permissions for seasonal leisure caravan use, but the increase to all year round residentail use for Gypsy and Traveller is still considered an unacceptable impact on the Green Belt. PBA recommend that the Council appoint a planning lawyer to establish the lawful use of plots and considered the rationalisation of those plots to the north western corner of the site in conjunction with the remediation of the remaining site (returning the land to open countryside to increase openness of the Green Belt and potentially balance the increased impact of permanent residential Gypsy and Traveller use in the north east corner.

Site boundary Land ownership

DELIVERY

Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	
2031 +	0	
Potential occupants		

Type of use

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref	Site name	Settle	ement	
EH006	Land at Archers Green	Welw	yn Garden City	
Site address		Local authority	Size (ha)	
		East Herts Council	29.4	
Description of site				
The site is a grassed area in the open countryside with mature trees, including oak trees, on it's boundaries and throughout the site.				
☐ Source: current unau ☐ Source: current auth ☑ Source: privately pro	orised Source: site survey	☐ Source: call for sites		
	Source, proad locati	OII		
Planning history There is no known relevant p	planning history.			
AVAILABILITY				
	e Council for development and assessed by and Traveller use within the next 10 to	in the Strategic Land Availability Assessr 20 years.	nent. The site is	
SUITABILITY				
Policy constraints Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints				
Highways - Category: Red: Direct vehicle access from the site onto B1000 Hertford Road would not be appropriate. This is a B classified secondary distributor road subject to a 60mph speed limit, and whilst there is no highway policy against new accesses onto such roads, it is very doubtful that the necessary level of visibility could be achieved. Access from the local access road stretch off Hertford Road (in the north eastern corner of the site) also appears to be problematic, most likely requiring the removal of many woodland trees for necessary visibility. This section of Hertford Road has a single width rural carriageway with restricted forward visibility in places. The westbound spur onto the B1000 has very restricted visibility in both directions, and the eastbound spur, although slightly better, is also substandard in this respect. Any additional traffic using these sections of the highway should be discouraged.				
Accessibility to services				
The site is poor in terms of sustainable travel options, with no footways on the adjacent public highways, or any nearby rail stops (Hertford North is 3 kilometres away). The nearest bus stop is within 60 metres. The nearest GP is within 3 kilometres, the nearest primary school is within 700 metres, and there are shops within 4 kilometres.				
Landscape Impacts				
southern boundary adjoins the site comprises a gently slopin A number of rights of way, in by woodland abutting a History outwards from the estate with distinctive and strongly rural	ne valley floor where the river and associang sweep of pasture of medium scale, op cluding Chain Walk, cross the site. The operation of the site of the state of the site and Garden (Panshager Estate) in significant woodlands. The valley and r	ands LCA (landscape strategy is to 'safeg ated land is identified as a wildlife site and ben and subdivided by fences, that define eastern end of the site is more elevated a b. The surroundings have a parkland chara iver combined with the vegetation pattern my development within the site would be we	d area of flood risk. The s the northern valley side. nd substantially enclosed acter, which extends gives the area a	

Green Belt Comments	
The site is located within Green Belt. The land contributes substantially to the Any development would be a clear encroachment into open countryside and	
Other Potential Impacts	
There are no other known potential impacts.	
ACHIEVABILITY	
The site is not suitable and therefore not achievable.	
Conclusion Development on this site would have an unaccentable impact on landscape	der the assess of the Croop Bolt. The cite is
Development on this site would have an unacceptable impact on landscape also unsuitable on highways grounds.	character and on the purposes of the Green Belt. The Site is
I	
	n (=5)/
	DELIVERY Potential Yield
	2014 - 2018 0
	2014 - 2018 0 2019 - 2023 0
	2024 - 2028 0
	2029 - 2031 0
	2031 + 0
1/ 1/1/	Potential occupants
160	
The state of the s	Type of use
The state of the s	5.
No Alla Maria	Delivery model
	Existing private site for either permanent
	authorisation, intensification or extension to meet family needs
N A A	Existing private site for intensification or extension to meet wider needs of communities
	New private site for development
	Existing public site for intensification or extension
	New public site for development
	New site to be developed as part of an urban extension
Site boundary	
Land ownership	Existing site requiring planning permission
	J
This map is reproduced from the Ordnance Survey map by Peter Brett Associates Majesty's Stationery Office - Crown Copyright, All rights reserved. East Herts Dist	

Site ref	Site name		Settlement	t
EH008	Land South of Owles Lane		Buntingford	
Site address		Local authority		Size (ha)
		East Herts Council		0.7
				-
Description of site				
This is a greenfield site on the south eastern edge of Buntingford, which is adjacent existing residential properties and a large vacant employment shed and associated buildings. The site is accessed via a narrow residential road, Owles Lane. The land slopes down from the central section to the eastern boundary.				
Source: current una	uthorised Source: strategic sit	te 🗌 Source: public owned	land	
Source: current auth		Source: call for sites		
✓ Source: privately pro	_			
	Cource. broad locati			
Planning history There is no known relevant p	Januaria e biata e			
AVAILABILITY	nailling filstory.			
The landowner has confirme	d that the site is potentially available for	Gypsy, Traveller and/or Travelling	Showpeople ι	ise.
SUITABILITY				
Policy constraints				
The eastern edge of the site is within flood zone 3. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt				
Physical constraints				
speed limit. It is narrow, of s London Road is reasonable.	r: The northern part of the site borders O ingle width, for most of its length, with few A site of up to 15 pitches might be accedith Travelling Showpeople would not accedith	w passing places for vehicles. Visit ptable subject to a suitable access	bility from Owl	es Lane onto
Accessibility to services	s:			
There are no footways along Owles Lane, although the site is not far from London Road which benefits from footways on both sides, and is a bus route. Buntingford town centre is located approximately 1 kilometre away. The nearest GP is within 1.5 kilometres and the nearest primary school is within 1 kilometre.				
Landscape Impacts				
forms an indent in the settler discreet being contained fror development which is soften wider landscape and visual h dwellings which may limit so	posed and any development would be out ment edge with houses to the north, west in the wider landscape to the east by the ed by vegetation. There is scope to acco narm with a new access off Owles Lane, ope. Whilst this will be contrary to existin ting along the southern side of the access id) settlement edge.	t and south. This area (marked in record of the ridge immediately to the mmodate a small Gypsy and Trave although there are likely to be ame gountryside protection policy, if deciding the country of the same of the country of the c	ed on the map east and relate eller site in this enity issues in development is	b) of land is ted well to existing is location without relation to existing is to be considered,

Green Belt Comments	
The site is not within the Green Belt.	
Other Potential Impacts	
The area of land identified as suitable in landscape terms is immediately adj Traveller development in this location would have an unacceptable impact o	
ACHIEVABILITY	
The site is not suitable and therefore is not achievable.	
Conclusion Development on the majority of this site would have an unacceptable landsc unacceptable impact on residential amenity. If Gypsy, Traveller and/or Travll Buntingford, the Council may consider the North west corner of the site as a the housing requirements.	lling Showpeople use is proposed for EH034 Land South of
	DELIVERY
	Potential Yield
	2014 - 2018 0
4 8 8 8 B	2019 - 2023 0
18	2024 - 2028 0
A Barrer	2029 - 2031 0
and the same of th	2031 + 0
	Potential occupants
	Type of use
Supposed of the second	Delivery model
	Existing private site for either permanent authorisation, intensification or extension to meet family needs
	Existing private site for intensification or extension to meet wider needs of communities
Caller	New private site for development
	Existing public site for intensification or extension
	New public site for development
	New site to be developed as part of an urban extension
Site boundary Land ownership	Existing site requiring planning permission
	s with the permission of the Controller of Her

Site ref	Site name		Settlement	t
EH018	Land at Braziers Field		Hertford	
Site address		Local authority		Size (ha)
Olto dadi 000		East Herts Council		0.6
Description of oito				
Area of woodland/scrub within the urban area of Hertford. The access road is via a residential road, Woodlands Road. An employment area is located to the south and west of the site.				
☐ Source: current unat☐ Source: current auth☐ Source: privately pro	norised Source: site survey		land	
Planning history There is no known relevant p	lanning history.			
AVAILABILITY				
Showpeople use. Council Proyears and intend to dispose of with nearby housing accomm	erts District Council and therefore deeme roperty Services state that the site has be of it in due course for a mixture of private modation. The recession has delayed an	een recognised as surplus to requir e and affordable housing possibly w	rements by the with some elde	e Council for many erly provision in line
SUITABILITY				
Policy constraints				
The site is within the urban area of Hertford and is not within any policy designation.				
proposal. Highways - Catego residential units. The carriag parking which restricts it to s the site then this makes it mi	ch could limit development as a Gypsy an ory: Amber: The site fronts onto Woodlan geway of Woodlands Road is double width single width. The site could potentially be such more unsuitable due to the limited for eway in possible conflict with oncoming very	nds Road, an unclassified local acc th although some sections do exper suitable, however if caravans and orward visibility and roadside parkin	cess road serv rience relative larger vehicle	ving around 80 ely heavy roadside es routinely access
Accessibility to services:				
The site is within 400 metres of a bus stop and 1 kilometre of Hertford East train station. The nearest GP is within 350 metres, the nearest primary school is within 450 metres, and there are shops within 1.5 kilometres.				
Landscape Impacts				
The site is within the urban a	rea.			

Green Belt Comments				
The site is not within the Green Belt.				
Other Potential Impacts				
The site is accessed through an established residential area and therefore	existing residential amenity would need to be considered in			
any proposal.	,			
ACHIEVABILITY				
The site is proposed to be developed for alternative uses (residential and el	derly housing). Whilst potentially available, policy and			
physical constraints indicate that the site would be difficult to deliver for Gy				
Conclusion The site is unavailable and unavitable for Curay and Travellar or Travelling	Chaumaanla ugaa dua ta pranagad Caunail uga far			
The site is unavailable and unsuitable for Gypsy and Traveller or Travelling residential and elderly housing and unsuitable highway access via an existing	ng residential area. The road layout and parked cars allow			
limited forward visibility and forces vehicles onto the opposite side of the ca	rriageway in possible conflict with oncoming vehicles. The			
site is also close to residential properties and whilst not insurmountable, this	s is another potential constraint.			
04/11/20	DELIVERY			
	Potential Yield			
	2014 - 2018 0			
	2019 - 2023 0			
	2024 - 2028 0			
	2029 - 2031 0			
A DAID COLOR	2031 + 0			
	Potential occupants			
B CONTRACTOR OF THE	Gypsies and Travellers			
A A A A A A A A A A A A A A A A A A A	Type of use			
	Residential			
	Delivery model			
	_			
The second second	Existing private site for either permanent authorisation, intensification or extension to meet			
	family needs			
	Existing private site for intensification or extension to meet wider needs of communities			
-Value	to meet when needs of communities			
	New private site for development			
	Existing public site for intensification or extension			
	New public site for development			
New site to be developed as part of an urban extension				
Cita haundani	CYTCHININI			
Site boundary	Existing site requiring planning permission			
Land ownership				
This man is reproduced from the Ordnance Survey man by Peter Brett Associate	s with the permission of the Controller of Her			

Site ref	Site name		Settlement	t	
EH025	Land between 50-52 Widford Rd		Hunsdon		
Site address	1	Local authority		Size (ha)	
Site audiess		East Herts Council		0.0	
		Last Horto Council		0.0	
Description of site		2 11 24 1 24 2		W -45-d	
	This is a small piece of land which is currently being used as a garden to an adjacent residential property, within Hunsdon. It is situated within a residential area and immediately adjacent other houses.				
Source: current unau	uthorised Source: strategic sit	te 🗹 Source: public owned l	land		
Source: current auth	_	_	una		
Source: privately pro					
Planning history					
There is no known relevant p	lanning history.				
AVAILABILITY					
The site is owned by East He Showpeople use.	erts District Council and therefore deeme	ed potentially available for Gypsy an	nd Traveller o	r Travelling	
SUITABILITY					
Policy constraints					
The site is within the village	of Hunsdon and not within the open coun	ntryside.			
Physical constraints					
There are no known physical	I constraints.				
Accessibility to services:					
The site is within 300 metres	s of a bus stop and 4.5 kilometres of Roye	don train station. The nearest GP i	s within 4.2 ki	ilometres, the	
nearest primary school is within 400 metres, and there are shops within 4.3 kilometres.					
Landscape Impacts					
The site is within the urban a	area and therefore would not have any un	acceptable impact on landscape ci	haracter.		

Green Belt Comments	
The site is not within the Green Belt.	
Other Potential Impacts	
The site is immediately adjacent residential properties, therefore any Gypsy	and Traveller development in this location would have an
unacceptable impact on residential amenity of the neighbouring properties.	
ACHIEVABILITY	
The site is not suitable and therefore is not achievable.	
The dite is not suitable and this sist is not as it.	
Conclusion The site is being used as a garden and is immediately adjacent existing resi	idential proportion
The site is being used as a garden and is infinediately adjacent existing resi	dential properties.
11 101	DELIVERY
	Potential Yield
	2014 - 2018 0
Little Samuels Farm	2019 - 2023 0
Little Samuels ram	2024 - 2028 0
	2029 - 2031 0
	2031 + 0
	Potential occupants
L'a s	
WIDFORD	Type of use
	7,77
ROSE TO THE PROPERTY OF THE PR	Delivery model
	•
	 Existing private site for either permanent authorisation, intensification or extension to meet
	family needs
5 15	
	Existing private site for intensification or extension
E SUPERIOR E	to meet wider needs of communities
	New private site for development
	Existing public site for intensification or extension
	New public site for development
	☐ New site to be developed as part of an urban
	extension
Site boundary	Existing site requiring planning permission
Land ownership	Existing site requiring planning permission
The state of the s	
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Site ref	Site name		Settlement	
EH026	Land at Poplar Close		High Cross	
Site address	address Local authority Size (ha		Size (ha)	
		East Herts Council		1.0
Description of site				
-	and and partly an overgrown area, on the	e eastern edge of High Cross, adjac	cent existing re	sidential
properties. The site has poo		, addicini adga at i ng.: 2.222, 2.55	3011. 0	
Source: current unau		te 🗹 Source: public owned	land	
Source: current auth				
Source: privately pro	omoted Source: broad locati	ion		
Planning history				
There is no known relevant p	olanning history.			
l				
AVAILABILITY				
	erts District Council and therefore deeme	ed potentially available for Gypsy ar	nd Traveller or	Travelling
Showpeople use.				
SUITABILITY				
Policy constraints Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt				
Local Plan (2007) policies: H Draft District Plan (2014) pol	HSG16 Accommodation for Gypsies; GB0 licies: HOU7 Gypsies and Travellers and	C2 The Rural Area Beyond the Gre I Travelling Showpeople; GB2 Area	en Belt Bevond the G	reen Belt; VILL1
Group 1 Villages				
Physical constraints				
The site has poor access off	North Drive.			
Accessibility to services	s:			
The site is within 450 metres of a bus stop and 4.5 kilometres of Ware train station. The nearest GP is within 4.1 kilometres, the nearest				
primary school is within 350 metres, and there are shops within 4.2 kilometres.				
Landscape Impacts				
The western boundary is def	e site is arbitrary with the eastern edge of fined by the edge of this wood and belts or ment. The site boundary includes a parro	of woodland to the north and south;	; these form a s	strong landscape

The eastern boundary of the site is arbitrary with the eastern edge of the central woodland block being used to 'square off' the boundary. The western boundary is defined by the edge of this wood and belts of woodland to the north and south; these form a strong landscape and visual edge to the settlement. The site boundary includes a narrow paved roadway which serves the rear gardens of the adjoining houses at Poplar Close. A right of way runs along the northern and eastern edge of the field, with a bridleway along the southern edge. These meet in the south east corner to cross the A10 via a bridge. Whilst the A10 has severed the field from the wider landscape to the east and mitigation mounding and planting alongside the A10; setting of the village has therefore been foreshortened creating a more discreet and intimate landscape than may have existed previously. The site is considered to be a wholly unsuitable location for development. Access is restricted and, to improve it would inevitably mean the loss of some significant vegetation on this important edge and any development beyond this well-defined edge would be a clear encroachment into open countryside beyond the visual and physical limits of the settlement. This would be contrary to the strategy of improving/conserving the landscape.

Green Belt Comments		
The site is not within the Green Belt.		
Other Potential Impacts		
The site is adjacent to existing residential properties, therefore any developm	ment could impact	on the residential amenity of existing
properties.	Hent Could Impact	off the residential afficiaty of existing
ACHIEVABILITY		
The site is not suitable and therefore is not achievable.		
Conclusion		
The site does not have an adequate access and development on this site wo	ould have an unac	ceptable impact on the landscape.
·		
	>=: "/EDV	
	DELIVERY	
	Potential Yiel	
	2014 - 2018	0
	2019 - 2023	0
	2024 - 2028	0
	2029 - 2031	0
The state of the s	2031 +	0
The state of the s	Potential occ	
	FULGITUAL OCC	upants
	Time of use	
	Type of use	
	Delivery mode	el
		ivate site for either permanent
B B Wasa		on, intensification or extension to meet
	family nee	
		ivate site for intensification or extension ider needs of communities
	LO IIICEL WI	ider needs of communities
	New privat	e site for development
Posted Congo	Existing pu	ıblic site for intensification or extension
	New public	site for development
		be developed as part of an urban
	extension	
Site boundary		
Land ownership	Existing site	e requiring planning permission
Land Office.		
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Site ref	Site name Settlement			
EH028	Land at Park Cottages Eastwick		-	
Site address		Local authority	1	Size (ha)
Olto addi oco		East Herts Council		0.3
				0.12
Description of site	first leasted to the court of the village (-f Esstudiate which has no highway		
This is a green held piece of	This is a green field piece of land located to the south of the village of Eastwick, which has no highway access.			
☐ Source: current auth☐ Source: privately pro	 □ Source: current authorised □ Source: site survey □ Source: call for sites □ Source: privately promoted □ Source: broad location 			
There is no known relevant p	Planning history There is no known relevant planning history.			
AVAILABILITY				
The site is owned by East He Showpeople use.	The site is owned by East Herts District Council and therefore deemed potentially available for Gypsy and Traveller or Travelling Showpeople use.			
SUITABILITY				
Policy constraints				
The central parts of the site is within flood zone 2 and 3. There is a Conservation Area adjacent the site to the south and a Listed Building to the west of the site. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints A large part of the centre of the site is within flood zone 3 which would restrict development in this location				
A large part of the centre of the site is within flood zone 3 which would restrict development in this location.				
	Accessibility to services:			
The site is within 150 metres of a bus stop and 1.2 kilometres of Harlow Town train station. The nearest GP is within 4.3 kilometres, the nearest primary school is within 3.1 kilometres, and there are shops within 5.1 kilometres.				
Landscape Impacts				
The site is uncontained and compact settlement.	development would be very visible and o	ut of place, extending into an open	level field on	the edge of this

Green Belt Comments	
Development would be contrary to Green Belt purposes, representing a clea	
countryside, within an area where the separation between Eastwick and the	northern edge of Harlow is relatively narrow.
Other Potential Impacts	
Any development in this location would potentially impact on the setting of o	church, which is a listed building
The northern part of the site is immediately adjacent existing residential pro	perties and therefore this location would not be suitable for
Gypsy and Traveller use, due to the potential impact on residential propertie	es of the neighbouring properties.
ACHIEVABILITY	
The site is not suitable and therefore is not achievable.	
Conclusion	
The site does not have access to a highway. Development in this location v	
and on the purposes of the Green Belt. The northern part of the site is adjacently in within flood games.	
site is within flood zone 3. Therefore the site is not suitable for Gypsy and T	raveller use.
	DELIVERY
emoral Lord	Potential Yield
52 (mm (total) +30 (1) 10 9	
The Lion	2011 2010
(PH) Culverts	2019 - 2023 0
の対してイン はる	2024 - 2028 0
LB SASTWICK POAD	2029 - 2031 0
	2031 + 0
Green	Potential occupants
Manor ottages Old	Type of use
School Ho	
sh's	Delivery model
, III	Existing private site for either permanent
	Existing private site for either permanent authorisation, intensification or extension to meet
[***]	family needs
1///	Existing private site for intensification or extension to meet wider needs of communities
	to meet wider needs of communities
7///	New private site for development
////	Existing public site for intensification or extension
////	New public site for development
	New site to be developed as part of an urban
	extension
Site boundary	Existing site requiring planning permission
Land ownership	
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Site ref	ref Site name Settlement			
EH029	Land adjacent 11 Roseley Cottages Eastwick			-
Site address		Local authority		Size (ha)
Olto dudi 000		East Herts Council		0.1
Durantan of oito				
Description of site	and which looks like part of the garden for	or 11 Decoloy Cottages It is accer	and via a res	idential etreet via a
garage court.	The site is a small piece of land which looks like part of the garden for 11 Roseley Cottages. It is accessed via a residential street via a garage court.			
☐ Source: current unau☐ Source: current auth☐ Source: privately pro	norised Source: site survey		land	
Planning history				
There is no known relevant p	ılanning history.			
AVAILABILITY				
	The site is owned by East Herts District Council, although it is currently in use for a garage court and therefore is not available for Gypsy and Traveller or Travelling Showpeople use.			
SUITABILITY				
Policy constraints				
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints	T. C. LT. II was and though			
The site access is too narrow for Gypsy and Traveller use and therefore not suitable.				
Accessibility to services:				
The site is within 250 metres of a bus stop and 1.3 kilometres of Harlow Town train station. The nearest GP is within 4.1 kilometres, the nearest primary school is within 3 kilometres, and there are shops within 5.2 kilometres.				
Landscape Impacts				
The site comprises an area of land at the western end of a terrace of houses within the clearly defined curtilage of the settlement. In landscape and visual terms the site is a suitable location for development.				

Green Belt Comments		
The settlement, including the site is 'washed over' by Green Belt. Whilst in p a rural character and development would not represent an encroachment int any development would represent a reduction in openness of the Green Belt within the settlement envelope the site may be considered suitable.	o rural countryside.	However, in Green Belt purpose terms,
Other Potential Impacts		
The site is immediately adjacent existing residential properties and therefore		not be suitable for Gypsy and Traveller
use, due to the potential impact on residential properties of the neighbouring	properties.	
ACHIEVABILITY		
The site is not suitable and therefore is not achievable.		
Conclusion The site is in use as a garage court and not available for Gypsy and Travelle	ruso. The site dec	os not have adequate access to the
highway and is also adjacent existing residential properties.	i use. The site doe	es not have adequate access to the
	DEL IVEDV	
15 7 7 15	DELIVERY Potential Yield	<u> </u>
	2014 - 2018	0
	2019 - 2023	0
FB	2024 - 2028	0
	2029 - 2031	0
/ 1	2031 +	0
	Potential occu	pants
	Type of use	
	Delivery model	
		ate site for either permanent
1 1 1 1 1 1 1 1 1	authorisation family need	n, intensification or extension to meet s
	☐ Evicting priv	rate site for intensification or extension
		ler needs of communities
E De la contraction de la cont	New private	site for development
Roseley Cottages	Existing pub	lic site for intensification or extension
and the state of t	☐ New public	site for development
The Uon (PH) Culverts		be developed as part of an urban
Site boundary	extension	
Site boundary Land ownership	Existing site	requiring planning permission
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Site ref	Site name Settlement				
EH031					
Site address		Local authority	,	Size (ha)	
Site address		East Herts Council		0.1	
Last Herts Council 0.1			0.1		
Description of site					
The south western part of the site is previously developed land with 6 single storey garages and concrete and stone surfacing. Access is shared with the primary school that lies directly to the south west and the hard standing appears to be used for school parking and as a drop-off point. The north western part is grassland appears to be managed by local people as a nature/wildflower area. Hedges define the boundaries of this grass area and there are some garden gates providing access into it. A mature oak tree lies on the north east boundary.					
☐ Source: current una	uthorised Source: strategic sit	te ✓ Source: public owned l	land		
Source: current auth	norised Source: site survey	☐ Source: call for sites			
☐ Source: privately pro	omoted Source: broad locati	ion			
Planning history					
There is no known relevant p	planning history				
There is no known relevant p	nationing motory.				
AVAILABILITY					
	and District Occurs it and the reference decrees	allocations and allocations are allocations and allocations are allocations and allocations are allocations and allocations are allocations ar	I T II	- T	
	erts District Council and therefore deeme the garage court section is currently in us Gypsy and Traveller use.				
SUITABILITY					
Policy constraints					
	HSG16 Accommodation for Gypsies; GBC	C1 Appropriate Development in the	Green Belt		
	licies: HOU7 Gypsies and Travellers and				
Physical constraints					
There are no known physica	l constraints.				
, , , , , , , , , , , , , , , , , , , ,					
Accessibility to services:					
The site is within 40 metres of a bus stop and 600 kilometres of Bayford train station. The nearest GP is within 4.3 kilometres, the					
nearest primary school is within 80 metres, and there are shops within 4.5 kilometres.					
Landscape Impacts					
In landscape terms, whilst the developed part of the site is a suitable location for development as it is previously developed land and contains no notable landscape features other than the boundary hedges, the undeveloped part of the site is not a suitable location as it would compromise the green character and edge to the village. If garage court part were to be developed this would also detract from the open nature of the undeveloped part with the addition of boundary fencing. Therefore the site is considered to be unsuitable.					

Green Belt Comments The site lies within Green Belt which 'washes over' the village. The existing garages detract from the openness of the Green Belt; if these were demolished and development (within the previously developed area) were to create no overall net change in the volume of buildings there would be no net change in the openness of the Green Belt. Other Potential Impacts The site is immediately adjacent existing residential properties and therefore this location would not be suitable for Gypsy and Traveller use, due to the potential impact on residential properties of the neighbouring properties. **ACHIEVABILITY** The site is not suitable and therefore is not achievable. Conclusion The garage is currently in use and the grassed area is amenity land, therefore the site is not available for Gypsy and Traveller use. Development on this site would have an unacceptable impact on landscape character and Green Belt purposes. There is also a potential impact on neighbouring properties. **DELIVERY Potential Yield** 2014 - 2018 2019 - 2023 0 2024 - 2028 0 Willow Corner 2029 - 2031 0 2031 + 0 Potential occupants Bayford Type of use **Delivery model** Existing private site for either permanent authorisation, intensification or extension to meet family needs Existing private site for intensification or extension to meet wider needs of communities New private site for development Existing public site for intensification or extension

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Site boundary

Land ownership

New public site for development

extension

New site to be developed as part of an urban

Existing site requiring planning permission

Site ref	Site name Settlement			
EH032	Land east of Reedings Way Sawbridgeworth			
Site address	te address Local authority			Size (ha)
East Herts Council 0.9			0.9	
Description of site This is a green field site on the eastern edge of Sawbridgeworth which is accessed through a residential area on Reedings Way. The site is a large green field with a few trees and bushes on site. Allotments are situated to the south east; the River Stort to the south east; and unknown use to the north of the site which appears to be large agricultural or employment sheds with vast area of disturbed land. The land drops down from the west to the east of the site.				
Source: current auth	 Source: current unauthorised Source: strategic site ✓ Source: public owned land Source: current authorised Source: site survey Source: call for sites 			
Source: privately pro	omoted	ion		
Planning history				
There is no known relevant p	namming mistory.			
AVAILABILITY				
The site is owned by East Herts District Council and has been confirmed as not available by the Council. Property Services - This land was until recently managed by my Team and let for grazing. The grazing agreement terminated and the land is now being managed by the Council's Parks and Open Spaces Team. It forms part of a larger area of open space and amenity land bordering the river. Part of the land behind the housing has been separated off and developed as a scout and community building and is leased to the local scout group for 40 years.				
SUITABILITY	SUITABILITY			
Policy constraints				
Parts of the eastern boundary are within flood zone 2 and the very edge of the boundary is within flood zone 3. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints				
The site shares it's access within the Scout Club which is situated to the west of the site. Highways - Category: Green: The site links into Reedings Way, which itself is connected to the wider highway network via Northfield Road, Bullfields and Cutforth Road. Many sections of these roads experience heavy roadside parking which reduces available carriageway width to one lane. Forward visibility is restricted in places. Traffic calming measures have been introduced along certain stretches of the highway, including that outside Reedings Junior School. Visibility onto Cambridge Road / A1184 from Cutforth Road is reasonable in both directions. Visibility from Bullfields onto Station Road is more restricted in both directions. A plot serving up to 15 pitches may be acceptable, subject to a suitable access into the site, but larger vehicles associated with Travelling Showpeople are unlikely to be acceptable at this location, given the need to route through relatively busy residential areas which have the limitations outlined above.				
Accessibility to services:				
Access to the sustainable transport infrastructure and local amenities is reasonable. The site is within 200 metres of a bus stop and 600 metres of Sawbridgeworth train station. The nearest GP is within 1 kilometre, the nearest primary school is within 450 metres, and there are shops within 900 kilometres.				
Landscape Impacts				
It consists of two rough pasture fields sloping gently down from the north east edge of the town to the River Stort navigation the east side of which is followed by a public footpath from which there appear to be views into the site. Allotments lie to the south, and a low grade landscape to the north around Kecksy's Bridge where there are buildings, scattered materials, and various other activities. The locality bears little relationship to the principal characteristics of the LCA (Thorley Uplands LCA) of which it forms the southern 'tip'. Whilst development within this site, being located immediately adjoining the town, bounded by other disrupted land and largely free of significant landscape features (other than boundary vegetation) is unlikely to have wider landscape or visual effects it would be apparent from the riverside footpath and extend development east of the current built up area. Overall, this is considered to be a poor site for				

Gypsy and Traveller development.

Cycon Bolt Commonts		
Green Belt Comments		
The site lies within Green Belt and any development would constitute a redumay only be justified by 'exceptional circumstances'.	iction in openness	and encroachment into countryside which
Other Potential Impacts		
The site is close to existing residential properties, therefore any development	nt could impact on	the residential amenity of existing
properties.		
ACHIEVABILITY		
The site is not suitable and therefore is not achievable.		
The site is not suitable and therefore is not definevable.		
Conclusion	- 14	and the second section of the second
The site is not available for Gypsy and Traveller use. Development on this scharacter and Green Belt purposes.	site would also hav	e an unacceptable impact on landscape
5. ca. ca. ca. ca. ca. ca. ca. ca. ca. ca		
	DELIVERY	
	Potential Yiel	d
	2014 - 2018	0
	2019 - 2023	0
A m	2024 - 2028	0
H THE	2029 - 2031	0
	2031 +	0
LITER TO THE STORY	Potential occ	upants
The state of the s		
HI TO TO TO THE TOTAL THE TOTAL TO THE TOTAL THE TOTAL TO THE TOTAL TH	Type of use	
	7,0000000	
	Delivery mode	yl
	-	vate site for either permanent
		on, intensification or extension to meet
		vate site for intensification or extension der needs of communities
	New privat	e site for development
# 9	Existing pu	blic site for intensification or extension
	☐ New public	site for development
	New site to extension	be developed as part of an urban
Site boundary	Existing site	e requiring planning permission
Land ownership		. 3. 3.
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Site ref	Site name	S	ettlement		
EH044	South of Hertford Hertford		<u> </u>		
Site address		Local authority		Size (ha)	
Land west of Mangrove Roa	· · ·		` '		
Description of site					
The strategic site is proposed for 50 homes to the west of Mangrove Road by 2021. This is an area of greenfield land located between existing urban areas and a green wedge area, on the southern edge of Hertford.					
Source: current una	uthorised 🗹 Source: strategic sit	te 🗌 Source: public owned lar	nd		
Source: current auth	_	Source: call for sites			
Source: privately pro	_				
Planning history					
There is no known relevant p	planning history.				
AVAILABILITY					
	at the potential strategic site is not availab	ble for Gypsy Traveller and/or Travel	ling Shown	nenle use. Delivery	
would require the Council to SUITABILITY	make provision a policy requirement of d	development.			
Policy constraints					
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; New Developments in Conservation Areas (BH6); Sport and Recreation Facilities (LRC1) Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT5 South of Hertford (allocation for 50 homes and greenspace buffer west of the site by 2021); Policy HA4 Conservation Areas					
Physical constraints					
Highways - The District Plan notes that 50 homes will be provided to the west of Mangrove Road by 2021. The EHC assessment notes that development of over 500 new dwellings would require the provision of a southern bypass to Hertford but 500 or fewer dwellings could be accommodated through upgrades to Mangrove Road. The development of the site was rated "Red" by the HCC due to potential impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and the congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers, as the impacts of vehicle trips generated by Gypsy and Traveller are similar in character to general residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible as sustainable transport measures including the encouragement of walking and cycling (including, inter alia, an upgraded pedestrian and cycle way along Mangrove Road to Simon Balle School), and enhanced passenger transport services will be provided to the site. The site is not considered to be suitable for Travelling Showpeople. Mangrove Road has a narrow carriageway that would not be able to accommodate larger vehicles associated with Travelling Showpeople. There is limited scope for widening the carriageway due to existing residential development and the scale of the proposed development limits the potential for significant highways contributions to fund widening.					
Accessibility to services:					
The nearest GP is within 600 metres. The nearest primary school is within 400 metres. The site is within 700 metres of the nearest shops. The nearest bus stop is within 50 metres. Hertford East train station is within 1 kilometre.					
Landscape Impacts					
Strategy Supporting Paper (area 13C) - This site is within a larger parcel of land assessed within the Paper. Landscape Character Scoring = Red. The LCA defines the site as lying within the town. It comprises a broadly rectangular level area of land (former sports ground) bounded by recent development to the north, a 'freestanding' rectangular block of housing to the south, Mangrove Road and sports ground to the east, and distinct narrow valley landform to the west. Trees provide robust features along the eastern southern and western boundaries and development contains the site to the north; the site therefore has a discreet and enclosed character and is unmanaged at present. It is identified as a wildlife site and part of a Conservation Area.					

Green Belt Comments

Strategy Supporting Paper (area 13C) - Green Belt = Red.

Draft Green Belt Review (area 21) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the southern edge of the town and occupies parcel 08C within Hertford Sub-Area C (Area 08) identified in the GBR. The GBR notes that the Area does contribute to checking sprawl 'to an extent', provides no contribution to preventing the merger of towns, and assists in safeguarding countryside from encroachment. However, the land on the eastern side of the road is deemed to fulfil these functions to a greater degree. Although the site is noted as a Wildlife Site, and boundary vegetation and the edge of the valley would also need to be respected, from a landscape and visual perspective the site appears to offer an opportunity to accommodate development without wider harm or significant conflict with Green Belt purposes. G&T development on its own is likely to be considered out of place in this site but, if the area is to be released from Green Belt, there may be an opportunity to accommodate a small scale development as part of a considered masterplan.

Other Potential Impacts

Historic Environment - The site is located within the Hertford Conservation Area and in general terms static and touring caravans and associated works would not contribute to the characteristics of the built form in terms of their location, form, scale, mass, design and materials; namely low levels of development containing large plots of detached buildings balanced with open space and vegetation. Furthermore they may not use local materials or respect the pattern of local development. Therefore any proposed development would not relate to the Conservation Area in a significant way, nor would it reflect the historic development of the immediate or wider setting, consequently not preserve or enhance the character and appearance of the Conservation Area.

ACHIEVABILITY

It appears that Gypsy, Traveller or Travelling Showpeople in this location would have an unacceptable impact on the Hertford Conservation area and could not be developed as part of an urban extension by developers, even if specific masterplanning and viability testing illustrates this could be appropriately designed . Policy and physical constraints are therfore not capable of being overcome and the site is not considered an achievable option.

Conclusion

The site is not confirmed as available and not considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, due to the negative impact development could have on the Hertford Conservation Area.



Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	
2024 -	0	

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

DELIVERY

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
 - Existing public site for intensification or extension
 - New public site for development
 - New site to be developed as part of an urban extension
 - Existing site requiring planning permission



Appendix E Sites with Potential - Stage 2

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Site ref	Site name		Settlement	t	
EH005	H005 Elmfield Stables Throcking				
Site address		Local authority		Size (ha)	
		East Herts Council		0.3	
Description of site	Description of site				
This is an existing Gypsy and Traveller site comprising a single touring caravan, stables and large area of flat pasture land. It has access from a private road (with right of way) and there are a number of other residential properties and stable buildings within the local area, accessed off the same road. There is a public right of way crossing the southern part of the site.					
✓ Source: current unau	uthorised	ite Source: public owne	d land		
Source: current auth	_	•			
Source: privately pro	_		1		
Planning history					
Planning permission (3/12/14	411/FP) for 1 pitch was refused on appea area; sustainability; and nature conserva				
The refused planning applica	ation and appeal decision were based upo	on an application for 1 mobile hom	e, 1 touring ca	aravan and stables.	
AVAILABILITY					
This is an existing unauthoris available for 1 Gypsy and Tra	sed Gypsy and Traveller site requiring ful aveller pitch.	ll planning permission. The owner l	nas confimred	I the site is	
SUITABILITY					
Policy constraints					
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt					
Physical constraints					
Highway - The site is accessed via a private road, and the landowner has right of access to the site. The site is remote from the main public highway, which itself is relatively narrow in places, with limited forward visibility. Small grass verge strips on either side provide some room for vehicles to pass by pedestrians and cyclists, but horse riders are more likely to be inconvenienced. A right of way route serves the site directly (Cottered 033 footpath) and this is of single width with few passing places. The access into the site drops down quite steeply and has substandard visibility onto the right of way carriageway in both directions, which will need improvement as part of any planning application. A development of a small number of pitches at the site may be acceptable to the highway authority, but in general, a development of any scale in this location would justify an objection on the grounds of compromising the highway safety and convenience of users of the public right of way network. It should be noted that the site is fundamentally unsuitable for traffic associated with Travelling Showpeople.					
Accessibility to services	s:				
Site sustainability is poor with no amenities in close proximity: The nearest bus stop is within 700 metres, but is not a regular service. The nearest GP is within 3.5 kilometres, the nearest primary school is within 4 kilometres, and there are shops within 4 kilometres.					
Landscape Impacts					
The area has already has several agricultural buildings located near the defined northern boundary of the site and adjacent site. Development of any significant scale would result in an unacceptable landscape impact given the sites openness from the public right of ways to the south and across the site. The impact of the existing unauthorised touring caravan is low and local. This is acceptable but a fenced compound with a number of touring vans and static caravans would be unsuitable. If development for a single touring pitch is to be acceptable the caravan would need to be retained close to the northern boundary and avoid the introduction of intrusive fencing. Suitable boundary treatments would include hedgrows in keeping with surrounding boundaries.					

Green Belt Comments	
The site is not within the Green Belt.	
The die is not main all cross point	
Other Potential Impacts	
Ecology - Great Crested Newts and Barn Owl have been identified in the are	ea. The site will require ecological investigation and proposed
mitigation as part of any planning application. It is considered that the site is across the the wider site ownership (outlined red and blue on the site plan).	potentially suitable if this issue is appropriately addressed
There is a residential property to the east of the site, but it is set back from the	he site and does not overlook the site.
ACHIEVABILITY	
There are potential costs for mitigation measures relating to landscaping, ec no reasons why the existing touring caravan could not gain full planning perm	
policy and physical constraints are capable of being overcome and mitigation	
finance the development. The development appears to be viable.	
Conclusion	
The site is an existing unauthorised site with 1 touring caravan, which is avai application was refused for 1 mobile home, 1 touring caravan and stables in	
landscape terms. However, a small scale development for permanent permi	ission for 1 touring caravan is suitable in planning policy
terms, subject to appropriate mitigation for landscape, highways and ecology facilities but the impact of travel for 1 touring caravan in this location is consi	y. The site does not have good access to local services or idered minimal. The site meets the needs of the current
occupier so represents a good fit with identifed needs. The site would not be	
accomodation in this location due to potential landscape impacts.	
	DELIVERY
	Potential Yield
Fishenin Visal	2014 - 2018 1
	2019 - 2023 0
	2024 - 2028 0
	2029 - 2031 0 2031 + 0
	2031 + 0 Potential occupants
e All P	•
	Romany Gypsies Type of use
	Residential
	Delivery model
	Existing private site for either permanent
	authorisation, intensification or extension to meet family needs
	_
	 Existing private site for intensification or extension to meet wider needs of communities
	New private site for development
	Existing public site for intensification or extension
	New public site for development
	New site to be developed as part of an urban
	extension
Site boundary	Existing site requiring planning permission
Land ownership	Lysting sice reduiting braining bettinssion
This map is reproduced from the Ordnance Survey map by Peter Brett Associates Majesty's Stationery Office - Crown Copyright. All rights reserved. East Herts Dist	

Site ref	Site name		Settlemen	1
EH013	Nine Acres High Cross			
Site address	, vane / 15.55	Local authority	1.13.1 - 1.1.1	Size (ha)
Jile audiess		East Herts Council		3.0
				0.0
Description of site This is an existing Gypsy and Traveller site, situated to the south of High Cross, comprising a large site which appears to be previously developed, although mostly now overgrown with buses and scrub. The site has existing caravans on site and a large area of hardstanding visible from the road entrance. It is located to the east of the main road leading into the village, with the access in the northern corner adjacent a large employment site.				
☐ Source: current unai	☐ Source: current unauthorised ☐ Source: strategic site ☐ Source: public owned land			
✓ Source: current auth	Source: current unauthorised Source: strategic site Source: public owned land Source: current authorised Source: site survey Source: call for sites Source: privately promoted Source: broad location			
Planning history				
Planning permission (3/0018/94FP) was granted on appeal for 2 mobile homes (+ 2 commercial vehicles and 1 trailer). Planning permission (3/10/1758/FP) increased the number of caravans to allow 6 additional mobile homes, which has not yet been fully implemented, but the construction of the hardstanding has commenced.				
AVAILABILITY				
	d Traveller site and therefore potentially a vailability of the site is confined to immed		andowner stat	es there is space
SUITABILITY				
Policy constraints Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt; land to the east of the site is designated Historic Park and Garden covered by Local Plan policy BH16 Historic Parks and Gardens. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt; HA1 Heritage Assets; HA8 Heritage Assets				
Physical constraints The site is not flat and slightly undulating which could be due to a previous landuse. Highways - Category: Green: Access to the site is shared with the adjacent industrial site. It is very wide, and visibility in both directions is reasonable. A significant intensification of use, or a change of use to include vehicles associated with travelling showpersons, would benefit from improvements to the access to more clearly segregate it from the industrial unit access. However, an increase of just 2 caravans is of little significance from a highways aspect.				
Accessibility to services	 S:			
	ide of the High Road carriageway and lea stops and local amenities: The nearest 0 s within 4.5 kilometres.			
Landscape Impacts				
The only views that appear to be possible into the site are from the site access, although this is limited by vegetation. A hedgerow along the southern boundary contains the site from the land which falls away to the south although this edge is likely to be visually sensitive. The hedgerow along the western roadside boundary obscures most of the site and there appears to be scrub developing on the adjoining parts of the site. There appear to be no overriding landscape or visual constraints to the accommodation of further development within this site. If further pitches are to be permitted these should be located close to the existing group, and avoid impacting on trees and hedgerows. Given the size of the site there are opportunities to accommodate planting to 'close off' the view into the site from the access road. Planting could be used to define a limit to any expansion of the existing development.				

	-
Green Belt Comments The site is not within the Creen Belt	
The site is not within the Green Belt.	
Other Potential Impacts	
Land to the east of the site is designated Historic Park and Garden, although	h the majority of the designated site lies beyond the A10.
ACHIEVABILITY	
There appear to be no reasons why the site could not be further developed by	by the existing occupants. The land is available, policy and
physical constraints are capable of being overcome and mitigation measure the development. The development appears to be viable.	s are feasible subject to the ability of the owner to finance
the development. The development appears to be made.	
Conclusion	
This is an existing Gypsy and Traveller site with 6 authorised pitches which r	needs to be safeguarded. The authorised pitches meet the
needs of the family up to the end of the plan period. The site is available for within the plan period as the identified need in the Accommodation Needs As	
for 2 or more pitches, subject to landscape and highway mitigation beyond the	
	DELIVERY
The state of the s	Potential Yield
	2011 2010
	2019 - 2023 0
	2024 - 2028 0
	2029 - 2031 0
The state of the s	2031 + 2
	Potential occupants
	Gypsies and Travellers
	Type of use
	Residential
	Delivery model
	✓ Existing private site for either permanent
	authorisation, intensification or extension to meet
	family needs
	Existing private site for intensification or extension
	to meet wider needs of communities
	□ New ariwate site for development
	New private site for development
	Existing public site for intensification or extension
	New public site for development
	☐ New site to be developed as part of an urban
A A A A A A A A A A A A A A A A A A A	extension
Site boundary	
1 11 11 11 11	Existing site requiring planning permission
Land ownership	
This map is reproduced from the Ordnance Survey map by Peter Brett Associates	s with the permission of the Controller of Her

Site ref	Site name Settlement		i	
EH014	Field Farm Levens Green			
Site address		Local authority		Size (ha)
	East Herts Council 1.3		1.3	
Description of site				
This is an existing Gypsy and Traveller site, situated within a countryside location. It comprises existing mobile caravans, a large agricultural building and number of other caravans. The site is well screened from the road.				
☐ Source: current una	uthorised 🗌 Source: strategic si	ite 🗌 Source: public owne	d land	
✓ Source: current authorised ☐ Source: site survey ☐ Source: call for sites ☐ Source: privately promoted ☐ Source: broad location				
Planning history Planning permission (3/2143/87EN) for 2 caravans was granted on appeal in 1992. Planning permission (3/0718-94FO) increased to a total of 4 caravans. Planning permission (3/12/1903/FP) then increased the number to a total of 6 caravans.				
AVAILABILITY				
This is an existing Gypsy and Traveller site and therefore potentially available for further pitches. The landowner states there is space for an additional 2 caravans. SUITABILITY				
Policy constraints	19046 Assemmedation for Gyneios: GRI	Co The Dural Area Payand the Gro	Dalt	
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt				
Physical constraints Highways - Category: Ambe	r - Red: The site is located on the C95 a	classified local distributor road sub	iect to the ma	vimum sneed limit
of 60mph. Due to the rural n assume that typical traffic sp falls well short of standards. even a modest increase in tr to be subject to a thorough a etc. Any more than this is ve	arture of the road, with restricted carriage beeds will be somewhat lower than this. In This, combined with the fact that the site rips at this site would be unacceptable. Assessment of on-site parking and turning any unlikely to receive the approval of the able for the larger types of vehicles associated in the larger types of vehicles associated in the larger types of vehicles.	eway widths in places and limited for However, the current site access is the is remote from the wider strategic An additional 2 pitches may be access g space facilities, and a wider asse Highway Authority unless significa	prward visibility poor in terms highway netweptable althous ssment of acc	y, it is reasonable to of visibility and vork, means that ligh this would need cident statistics,
Accessibility to services	s:			
The site is remote from the sustainable transport network, the nearest train station is over 6 kilometres away. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometres, and the nearest shops are over 7 kilometres away.				
Landscape Impacts				
There appears to be scope to accommodate an additional pitch without significant landscape or visual harm as long as this is located in the southern part of the site closely related to the existing buildings, although this would be an encroachment into countryside where development is normally resisted. Existing boundary vegetation is important to the assimilation of this site and this vegetation should be protected (and perhaps enhanced) as part of any proposal. Development should not be located near the western boundary (where reinforcement may be justified) and new (native) planting should be required in the form of a hedgerow along the northern and eastern side of the site access and park home to screen views in from the site entrance, conceal the suburban boarded fence alongside the existing plot and define the boundary of the site from the adjoining field.				

Green Belt Comments The cite is not within the Course Belt	
The site is not within the Green Belt.	
Other Potential Impacts	
There are no other known potential impacts.	
ACHIEVABILITY	
There appear to be no reasons why the site could not be intensified by the experiments are concluded by the experiments are conclude	xisting residents. The land is available, policy and physical
constraints are capable of being overcome and mitigation measures are feas development. The development appears to be viable.	sible subject to the ability of the owner to illiance the
Conclusion This is an existing Cyppy and Traveller site which peods to be defequered.	There is seen to see ammedate an additional pitch without
This is an existing Gypsy and Traveller site which needs to be safeguarded. significant landscape impact, although any further proposals would need to	be subject to a thorough assessment of highway impact and
landscape mitigation measures. The GTAA identified that the site has unuse Therefore the additional pitch should not be required within the plan period.	
Therefore the additional pitch should hot be required within the plan period.	
	DELIVERY Potential Viola
	Potential Yield 2014 - 2018 0
	2014 - 2018 0
	2024 - 2028 0
	2029 - 2031 0
	2031 + 1
	Potential occupants
	Gypsies and Travellers
	Type of use
	Residential
	Delivery model
10/1	✓ Existing private site for either permanent
R	authorisation, intensification or extension to meet
	family needs
	 Existing private site for intensification or extension to meet wider needs of communities
	New private site for development
	Existing public site for intensification or extension
	New public site for development
	☐ New site to be developed as part of an urban
	extension
Site boundary	Existing site requiring planning permission
Land ownership	Laisting site requiring prairing permission
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Appendix F Green Belt Sites with Potential – Stage 2

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0:1	0''		0.44	
Site ref			Settlement Bayford	
EH001	The Stables		,	
Site address			Size (ha)	
Bayford Lane East Herts Council 0.3			0.3	
Description of site				
This is an existing Gypsy and Traveller site, situated within a countryside location, to the south west of Hertford. It is located on the corner of Bayford Lane and Lower Hatfield Road and comprises existing caravans on the north eastern corner, and the remainder of the site is greenfield.				
 Source: current unauthorised Source: strategic site Source: public owned land ✓ Source: current authorised Source: site survey Source: call for sites 				
Source: privately pro	omoted Source: broad locat	tion		
Planning history				
Planning permission (3/02/0941/FP) granted on appeal for 1 caravan. Planning permission (3/08/1100/FP) was granted on appeal, in 2009, to increase the number of caravans to 5 in total, plus 1 touring caravan. Planning permission (3/13/1803/FO) was granted, in 2014, for an additional 3 caravans.				
AVAILABILITY				
This is an existing Gypsy and Traveller site and the landowner has stated that the site is available for further pitches. The ANA has not identifed specific needs from the site, therefore it is considered that available capacity will not be required unit! after 2031.				
SUITABILITY				
Policy constraints				
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints				
Highways - Category: Amber: Direct vehicle access from the site onto Lower Hatfield is unlikely to be appropriate. This is a B classified secondary distributor road subject to a 60mph speed limit, and whilst there is no highway policy against new accesses onto such roads, it is very doubtful that the necessary level of visibility could be achieved. The existing access onto Broad Green / Bayford Lane is more appropriate although its location close to the junction with Lower Hatfield Road is a concern. Nevertheless, this access has recently been relocated slightly further south from the junction which does improve matters slightly. A modest increase in pitches up to 15 might be acceptable (so long as sufficient parking and turning space is provided within the site), but an increase beyond this would result in real concerns around the free and safe flow of traffic at the Bayford Lane / Lower Hatfield Road junction. Another relocation of the access further south would overcome this concern, however, this may restrict visibility onto Bayford Lane to substandard levels. Traffic associated with Travelling Showpeople use is less appropriate at this site.				
Accessibility to services:				
The site is somewhat remote from sustainable transport infrastructure. No convenient access to bus services is in place, and there are no footways along adjacent public highways. However, Bayford Rail station is located approximately 2 kilometres away via relatively quiet rural roads which may be suitable for cyclists. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometers, and there are shops within 3 kilometres.				
Landscape Impacts				
Existing site located in the Essendon-Brickendon Farmed Slopes LCA (landscape strategy is to improve and repair) on the edge of the Lea Valley, where settlement is typically limited, discreet and generally of a vernacular style. Land rises steeply to woodland to the south and some of this woodland lies within the southern part of the site. Additional land is available to the south west, which appears to be also steeply sloping, small scale pasture. The site is difficult to view with thick hedgerows along the northern and eastern road frontages, and woodland directly south of the existing site. The landscape structure of this area appears strong and this provides containment to the site. Further development within the existing site is unlikely to give rise to significant adverse landscape or visual effects as long as it avoids the woodland in the southern part. Expansion into the undeveloped land to the south west would be inappropriate as this is likely to lead to disruption to the sloping landform and erosion of character.				

Green Belt Comments		
The site lies within Green Belt. As such any further development beyond the openness and constitute an encroachment into open countryside.	permitted site bou	ndary would lead to a reduction in
Other Badanatal Immanda		
Other Potential Impacts There are no known potential impacts.		
There are no known potential impacts.		
ACHIEVABILITY		
It appears the site could be intensified by the occupants within the existing,		
constraints are capable of being overcome and mitigation measures are feat development. The development appears to be viable.	SIDIE SUDJECT TO THE	ability of the owner to linance the
Conclusion		
This is an existing Gypsy and Traveller site which needs to be safeguarded. further intensification for two additional static caravans, which would not hav development beyond the permitted site boundary would lead to an impact or the Green Belt and therefore there would require 'very special circumstance allocated within the District Plan for this site to come forward for Gypsy for T within the plan period, therefore potential capacity would not be required unt	e any impact on the n the landscape and s' to be established raveller use. The A	e purposes of the Green Belt. Further d Green Belt purposes. The site is within I as part of a planning application or
All //c	DELIVERY	
	Potential Yiel	
A TANK	2014 - 2018	0
	2019 - 2023	0
	2024 - 2028	0
	2029 - 2031	0
	2031 +	2
	Potential occ	•
	Irish Travellers	only
	Type of use	
0 4	Residential	
	Delivery mode	ı
		vate site for either permanent on, intensification or extension to meet Is
-///		vate site for intensification or extension der needs of communities
	☐ New private	e site for development
	Existing pub	olic site for intensification or extension
	☐ New public	site for development
Consorted Clarence	New site to extension	be developed as part of an urban
Site boundary Land ownership	Existing site	requiring planning permission
This map is reproduced from the Ordnance Survey map by Peter Brett Associates	s with the permission	of the Controller of Her

Site ref	Site name		Settlement	
EH002 Water Hall Quarry Complex Letty Green		,		
	Water Hair Quarry Complex		Letty Green	
Site address		Local authority		Size (ha)
East Herts Council 0.7		0.7		
Description of site				
The site is a quarry complex amounting to nearly 130 hectares divided into 5 parcels of land, located to the north and south of the B158 Lower Hatfield Road to the south west of Hertford. The site comprises land in active mineral extraction (Bunkers Hill Quarry), restored agricultural land (Pollards), woodland, land which is being restored (Southfield Wood and New Field), office and recycling facilities (adjacent to Water Hall Farm) and open lagoons.				
Source: current unau	uthorised 🗌 Source: strategic si	ite Source: public owne	d land	
Source: current auth	_	•		
✓ Source: privately pro			i	
	Source, broad local	шоп		
Planning history The site has been in use for minerals extraction since the 1940s.				
AVAILABILITY				
The site was promoted to the Council for development in the Strategic Land Availability Assessment Call for Sites exercise. It was promoted primarily for potential uses including Gypsy and Traveller, Travelling Showpeople, community facilities, leisure/recreation, employment, renewable energy, mixed use or 'other'.				
SUITABILITY				
Policy constraints				
A small section of the central part of the site is within flood zone 2. Scheduled Ancient Monument is located on the eastern edge of the northern block of the site. There are a few Local Wildlife Sites designated across the site. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt				
Physical constraints				
as sections of the wider publ Hatfield Road. Lower Hatfield the sites are substandard in these are established access activities are now less intens does not increase the amoun to the site from other parts o	or: The site covers a large area of land wholic right of way network. The site has existed is a B classified secondary distributor of terms of visibility, with the northern accesses with no recorded accident history at sive overall than previous years, a travelle nt of traffic using the accesses to above to the public highway and the wider right of forward visibility on approach to the site, a	sting vehicle access both from the it road subject to a 60mph speed limites particularly limited. However, it is them over the past 5 years. Bearing or development would be acceptabethat which has been permitted in past of way network are unlikely to be su	north and sout t. Both of the r must be ackno g in mind that ble at this locat ast planning co uitable. This is	th onto Lower main accesses into owledged that the sites quarrying tion so long as it onsents. Access due to narrow
Accessibility to services	s:			
The site is somewhat remote from sustainable transport infrastructure. No convenient access to bus services is in place, and there are no footways along adjacent public highways. However, Bayford Rail station is located in the vicinity of the southern section of the site and via relatively quiet rural roads which may be suitable for cyclists. The nearest GP is within 4 kilometres, the nearest primary school is within 2 kilometres, and there are shops within 4 kilometres.				
Landscape Impacts				
The landscape is very disrupted by the extraction operations, although these are surprisingly discreet within the wider landscape, and restoration of the worked areas appears to be quite recent so the landscape structure within those areas remains weak but will strengthen over time. The most accessible areas are those located near the B158 and the only scope for accommodating a Gypsy and Traveller site appears to be within an area that is already developed as part of the mineral workings set back to the north of the road adjoining an industrial estate, where a small development could be integrated.				

Green Belt Comments

The site lies within Green Belt which prevents encroachment into the countryside and is relevant to the maintenance of separation between Hertford and Welwyn to the west. Development outside those areas that have already been developed with buildings as part of the mineral extraction operations would lead to a loss of openness and would not be appropriate. There is a programme of restoration as areas are worked out and the disruption resulting from extraction works to the openness of these areas will only be 'temporary'.

Other Potential Impacts

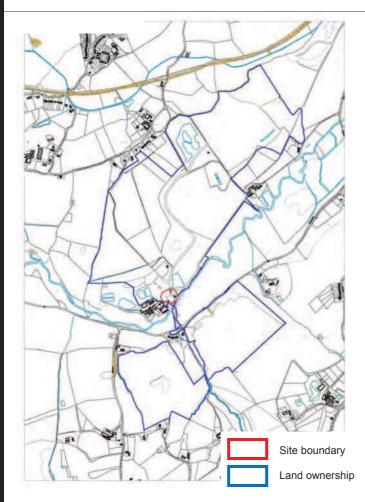
The site is currently (or has been used previously) for mineral extraction and therefore the previous use may have implications for developing the site for another use.

ACHIEVABILITY

There are potential costs for mitigation measures relating to landscaping and potential contamination/stability issues. There appear to be no reasons why the site could not be sold by the existing landowner for a private or public site. The land is potentially available, policy and physical constraints are capable of being overcome and mitigation measures are feasible subject to the ability of the owner to finance the development. The development appears to be viable.

Conclusion

The site is accessed via a working mineral plant and therefore is not potentially available in the short term. The site has been promoted for various uses including Gypsy and Traveller or Travelling Showpeople use and therefore deemed potentially available. The site is within the Green Belt and therefore there would need to be 'very special circumstances' or the Green Belt boundary would need to be redrawn for this site to come forward for Gypsy, Traveller or Travelling Showperson use.



DELIVERY

Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	15	
2029 - 2031	0	
2031 +	0	

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- ✓ New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission



Appendix G Assessment of Strategic Locations

Page 110 of 138

Site ref	Site name		Settlement						
EH034	Land South of Buntingford		Buntingford						
Site address		Local authority	'	Size (ha)					
London Rd		East Herts Council		10.2					
Description of site				L					
Land to the east of London Road, south of Windmill Hill (the former Sainsbury's Distribution Depot) is allocated as a residential-led mixed-use site to include approximately 300 homes by 2021. the site comprises a large redundant supermarket depot comprising a large employment shed and associated smaller buildings, accessed from a roundabout. It is located to the south of Buntington, adjacent existing to residential properties to the north west and open countryside to the east.									
☐ Source: current unau	uthorised 🗹 Source: strategic si	ite Source: public owne	hand h						
Source: current auth	Source: current authorised □ Source: site survey □ Source: call for sites □ Source: privately promoted □ Source: broad location								
Planning history									
There is no known relevant planning history.									
AVAILABILITY									
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development. The site is adjacent to site EH008 land South of Owles lane which offers the opportunity to enlarge strategic site slightly to accommodate Gypsy, Traveller or Travelling Showpeople use without a net loss of housing provision and potentially development value.									
SUITABILITY									
Policy constraints									
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC2 The Rural Area Beyond the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GB2 Area Beyond the Green Belt; BUNT3 Land South of Buntingford (allocation for 300 homes, employment uses and access serving Bury Football Club grounds by 2021). Physical constraints									
There are a number of existing									
There are a number of existing buildings on site which would need to be demolished in any redevelopment of the site. Highways - The site is located to the east of London Road, south of Windmill Hill (on the former Sainsbury's Distribution Depot). The site is allocated as a residential-led, mixed-use site to include approximately 300 homes by 2021. The "Amber" rating for vehicular access in the previous EHC assessment is a general rating for all proposed development sites located within existing built-up areas in Hertfordshire. As a result, there are no major issues associated with vehicle access and the site is considered to be appropriate for Gypsy and Traveller. The existing vehicle access currently provides three exit lanes and multiple entry lanes to the roundabout, with good visibility in both directions. This is also considered to be appropriate for Travelling Showpeople and would also be able to accommodate larger vehicles associated with them.									
Accessibility to services	3:								
	etres away, the nearest primary school is is 110 metres away. Watton-at-Stone tra			res of the nearest					
Landscape Impacts									
buildings already located on	area of Buntingford and therefore is con site. ent (Sieve 1: Area 9) - Landscape Charac		scape impact	compared to the					

Green Belt Comments		
The site is not within the Green Belt.		
Other Potential Impacts		
There are residential properties adjacent, to the north west of the site, although the scale of the buildings compared to the buildings currently on site.	ough the redevelopm	nent of the site has the potential to reduce
ACHIEVABILITY		
There are a number of existing buildings on site which would need to be detended the site. Otherwise, there appears to be no reasons why a Gypsy and Travepart of an urban extension by developers, subject to masterplanning and via capable of being overcome and mitigation measures are feasible.	eller or Travelling SI	nowpeople site could not be developed as
Conclusion Whilst the site is not confirmed as available and has recenlty been submitted provision, the site is considered to represent a policy option for the Council Travelling Showpeople site, subject to its wider development for residential. scale of development proposed in this location, however the Council may we utilising a small part of the adjacent site (EH008). This would potentially allowed provision of a larger site without a reduction of housing provision and potentials.	to deliver a small so Capacity would new ish to consider a lar ow sufficent land and	ale private Gypsy and Traveller or ed to be considered proportionate to the ger site in this non Green Belt location d an appropriate layout to enable the
3571111	DELIVERY	
	Potential Yield	1
0.8	2014 - 2018	0
0 000000	2019 - 2023	0
B anococció	2024 - 2028	0
A B	2029 - 2031	0
a B	Potential occu	ıpants
The state of the s		ellers or Travelling Showpeople
00	Type of use	
TO THE STATE OF TH	Residential	
-	Delivery model	
Same and a second	Existing priv	vate site for either permanent on, intensification or extension to meet
		vate site for intensification or extension der needs of communities
	New private	site for development
The state of the s	Existing pub	olic site for intensification or extension
	☐ New public	site for development
		be developed as part of an urban
Site boundary	Existing site	requiring planning permission
Land ownership This map is reproduced from the Ordnance Survey map by Peter Brett Associate	os with the permission	of the Controller of Her

Site ref	Site name		Settlement					
EH037	Land East of Manor Links		Bishop's Stor					
Site address		Local authority		Size (ha)				
Manor Links		East Herts Council		6.2				
Description of site								
This is an area of greenfield land located between a golf course and the existing urban area, on the eastern edge of Bishop's Stortford. Development of 150 homes will be provided between 2016 and 2021								
Source: current unauthorised ✓ Source: strategic site Source: public owned land Source: current authorised Source: site survey Source: call for sites Source: privately promoted Source: broad location								
Planning history There is no known relevant planning history.								
AVAILABILITY								
	at the potential strategic site is not availat make provision a policy requirement of d		velling Showpo	oeple use. Delivery				
SUITABILITY								
Policy constraints Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; BISH6 East of Manor Links (allocation for 150 homes between 2016 and 2021)								
Physical constraints Highways - The development would consist of 150 homes and will be provided between 2016 and 2021. The previous EHC assessment notes that access could potentially be achieved via Haymeads Lane, Manor Links, Beldams Lane or the A1250 (Dunmow Road). All of these potential accesses would be able to accommodate Gypsy and Traveller vehicles which are largely similar to existing and proposed residential traffic. Therefore the site is considered suitable. However there may be potential issues associated with larger vehicles used by Travelling Showpeople as some of the potential access points are residential roads with a narrow carriageway and limited scope for widening (due to existing residential development and the scale of the proposed development that limits the potential for significant highways contributions). However access for Travelling Showpeople could be restricted to the other potential access points which can accommodate larger vehicles.								
Accessibility to services								
	re away. The nearest primary school is w is 200 metres away. Bishops Stortford tr			s of the nearest				
Landscape Impacts								
undertaken for landscape implemente site comes forward for re	area 3B) - This site is within a larger parc pact. It would appear that the site would esidential development. There appears to and Traveller or Travelling Showpeople	be acceptable for Gypsy and Trave be scope, as part of a well-consider	eller or Travell	ling Showpeople, if				

Strategy Supporting Paper (area 3B) - Green Belt/Strategic Gaps = Red.

Draft Green Belt Review (area 40) - This site is within a larger parcel of land assessed within the Green Belt Review. This parcel makes a 'significant contribution' to preventing neighbouring town and urban area (Stanstead Airport and motorway development and related infrastructure) from merging. The parcel either makes a 'contribution' or 'limited contribution' to the other purposes of the Green Belt. The Strategy Supporting Paper states 'this issue (strategic gap) is not considered to be significant enough to limit development.' Part 2 of the East Herts Green Belt Review identifies this site as potential Green Belt release. It is considered that the site is relatively well contained between the urban edge and golf course and in isolation is not considered provide a significant contribution to the purposes of the Green Belt.

Other Potential Impacts

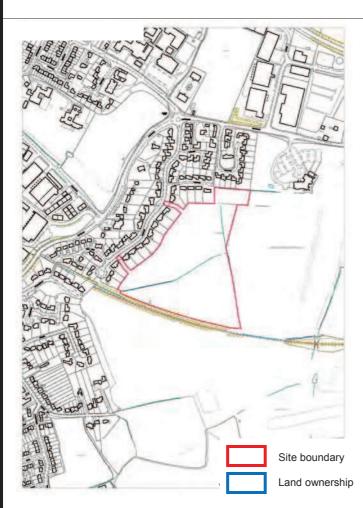
The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of the existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale fo development proposed in this location.



DELIVERY

Potential Yield			
2014 - 2018	0		
2019 - 2023	0		
2024 - 2028	0		
2029 - 2031	0		

Potential occupants

Gypsies and Travellers

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref Site name			Settlement					
EH038	Land South of Bishops Stortford		Bishop's Stortford					
	Land South of Dishops Stortion	1						
Site address (Sub Area A)		Local authority East Herts Council	Size (ha) 54.1					
<u> </u>		East heits Council	J4.1					
Description of site								
This is an area of greenfield land located between St James Way, Thorley Street and the existing urban area, on the southern edge of Bishop's Stortford. As part of the mixed-use development of this area, between 750 and 1,000 homes will be provided between 2016 and 2026.								
☐ Source: current unau	uthorised 🗹 Source: strategic si	ite Source: public owner	d land					
Source: current unau	_							
Source: privately pro	_							
	Julioted Jource. Droad room	HOII						
Planning history There is no known relevant p	Nanning history							
AVAILABILITY								
The agent has confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development.								
SUITABILITY								
Policy constraints Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; BISH7 South of Bishop's Stortford (allocation for 750 homes or 1000 homes, employment land, and potentially a secondary school, between 2016 and 2021)								
Physical constraints								
Physical constraints Highways - The site is located on the southern edge of Bishop's Stortford. As part of the mixed-use development of this area (including a primary school, potentially a secondary school, a new district centre, and new employment area), between 750 and 1,000 homes will be provided between 2016 and 2026. It is noted that the HCC have raised an issue with this site due to modelling work that indicates a significant increase in congestion on London Road northbound, and additional delays on London Road / Stansted Road (the main north-south corridor). However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the traffic generated by the proposed development can be effectively managed or mitigated. The site is considered to be suitable for Gypsy and Traveller, as the provision of a number of traveller pitches within a development of up to 1000 dwellings is unlikely to have any noticeable impact on the highway network. The site is also considered to be suitable for Travellign Showpeople. The local road network provides a number of potential access points to the site that are likely to be able to accommodate larger vehicles associated with Travelling Showpeople. The development would also comprise commercial and employment land uses which are likely to generate larger vehicle movements. As a result, the additional larger vehicle movements generated by Travelling Showpeople would not adversely affect the local highway network.								
Accessibility to services								
	etres away. The nearest primary school is ops within the site boundary. Bishops Sto							
Landscape Impacts								
site lies within the north easte boundaries of which are defir the town has extended up to boundary. A small watercours feature. A public footpath and the land rising north of the sti	area 4A) - This site is within a larger parciern comer of the Thorley Uplands LCA (Lened on all sides by roads. Ribbon develop Obrey Way and Whittington Way along the runs across the southern part of the set the Hertfordshire Way cross the site. The cream up to the settlement edge, which is the fire the town. There is no perception of the	LCA 85). The site comprises a large pment extends along the eastern si the northern boundary. The ring roasite and the landform falls from the landscape is broadly open with a concealed beyond a strong line of	e tract of arable farmland the ide, whilst the southern edge of ad defines the southern north and south towards this clear views across most parts; vegetation, and provides a					

Strategy Supporting Paper (area 4A) - Green Belt = Red. Draft Green Belt Review (area 36) - This site is within a larger parcel of land assessed within the Green Belt Review. The site lies on the south western edge of Bishops Stortford and comprises all of Sub-Area A (Area 04), which is divided into three parcels, identified in the GBR. The GBR notes that the Area does assist with checking sprawl having retained openness and safeguarding the countryside from encroachment. It is not considered to provide any contribution to preventing merging with the nearest town (Sawbridgeworth) but does prevent merging with the village of Thorley. It is not regarded as fulfilling the purpose of preserving the setting and special character of the historic town. Due to the nature of the Area there is no opportunity to release only part of this site; it is 'all or nothing'. If this Area were to be released from the Green Belt it would extend the urban area into an open and prominent landscape and lead to a very clear perception of encroachment and reduction in openness. It would provide a long term expansion area for the town and there would clearly be scope to accommodate G&T development as part of a well-defined masterplan. However, if the site is retained in Green Belt there appears to be no locations that may accommodate a small G&T development without breaching clear boundaries and giving rise to conflict with Green Belt purposes (primarily encroachment into countryside) and adverse landscape and visual effects

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

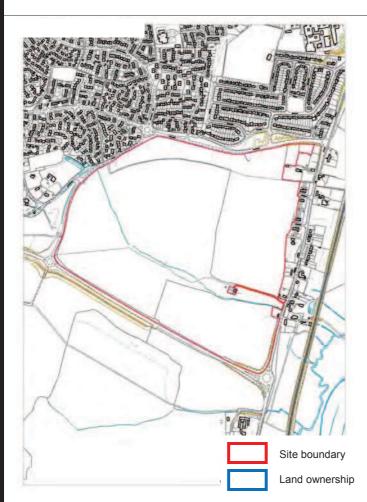
Potential impacts on the views and vistas, in particular those relating to Thorley Church.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a medium size Gypsy and Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield			
2014 - 2018	0		
2019 - 2023	0		
2024 - 2028	0		
2029 - 2031	0		

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

Existing private site for either permanent authorisation, intensification or extension to meet
family needs

Existing	private	site 1	for	intensification	or	extension
to meet	wider	needs	of	communities		

	New	private	site	for	devel	opment	
	110 11	privace	3166	101	ac ret	Opinicin	

	Existing	public	site	for	intensification	or	extension
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New public site for development

V	New	site	to	be	develope	d as	part	of	an	urba	ı
	exte	nsion	1								

Frankina a	-:	 	permission

Site ref	Site name		Settlement	
H039 Land North of West Road (West of Sawbridgeworth) Sawbridgeworth				
	Land Hotel of Hoot Hood (Hoot S. Sa.		•	
Site address Land north of West Road		Local authority East Herts Council	Size (ha) 5.9	
		Last ricits Couriei	0.0	
Description of site				
is an area of greenfield land	oad is allocated as a residential developn located between the countryside and the ll ground, primary school and existing res	e existing urban area, on the wester		
☐ Source: current una	uthorised 🗹 Source: strategic si	ite Source: public owne	d land	
Source: current auth	_	•		
Source: privately pro	_			
Planning history		•••		
There is no known relevant p	olanning history.			
AVAILABILITY				
	at the potential strategic site is not availat make provision a policy requirement of d		relling Showpoeple use. Delivery	
SUITABILITY				
Policy constraints				
Draft District Plan (2014) poli West Road (West of Sawbrid	ISG16 Accommodation for Gypsies; GBC icies: HOU7 Gypsies and Travellers and dgeworth) (allocation for 100 homes and d	Travelling Showpeople; GBR1 Green		
Physical constraints Highways - Land to the north	n of Woot Dood is allocated as a resident	tial davalanment site to accommod	lata approximately 100 homes by	
2021. It is noted that the Rec SAWB3) located on West Red dwellings. However for the p that the required Highways I wehicle trips generated by G significant adverse impacts of The site is not considered to	b be suitable for Travelling Showpeople. Ves associated with Travelling Showpeople	ructure is for the combined impacts in Bypass to mitigate traffic generate e site for Gypsy, Traveller and Travite is considered to be suitable for Gillar to the general residential vehicle. West Road has a narrow carriageway	of both of the sites (SAWB2 and ed for development above 500 velling Showpeople, it is assumed typsy and Traveller, as the le trips, and would not cause any ay that would not be able to	
Accessibility to services	s:			
	es away. The nearest primary school is w netres away. Sawbridgeworth train station		50 metres of the nearest shops.	
Landscape Impacts				
Scoring = Red. The site lies sloping arable field which is ceastern boundary is reasona houses and football ground r	area 16A) - This site is within a larger par within the southern edge of the Thorley L quite open and exposed to the gently und ably well vegetated and this provides a so reasonably well contained beyond. This e ament of the settlement into the adjoining	Uplands LCA (LCA 85). It consists of dulating largely open rural landscap oftened edge along the edge of the edge therefore limits the influence o	of an irregular sided gently be to the west/north west. The settlement with the school, of the urban area and avoids any	

Strategy Supporting Paper (area 16A) - Green Belt = Red. Draft Green Belt Review (area 34) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' to all purposes of the Green Belt. The site lies on the western edge of Sawbridgeworth and comprises parcel 09D in Sub-Area A (Area 13) identified in the GBR. The GBR notes that the parcel performs reasonably well in terms of checking sprawl, provides no contribution to preventing the merger of towns (and a limited contribution to merging with neighbouring village, and assists in safeguarding countryside, that is recognised in the LCA as being in good condition, from encroachment. Although relatively featureless the site has a strong rural character forming part of the gently undulating broadly open landscape that extends around the western side of the settlement. Although it abuts the settlement this is reasonably well contained and development within this site would undoubtedly appear as a significant encroachment into the countryside to the very insignificant boundary of the small watercourse (the GBR accepts this as being weak); the sloping nature of the site would also make it difficult to integrate. If the site is selected for release from the Green Belt to accommodate development there may be some scope to accommodate a small G&T development as part of the masterplan.

Other Potential Impacts

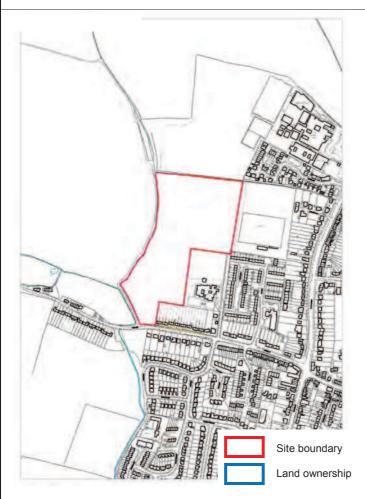
The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale fo development proposed in this location.



DELIVERY

Potential Yield	i
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

Existing private site for either permanent
authorisation, intensification or extension to meet
family needs

Existing	private	e site f	or	intensification	or	extensio	n
to meet	wider	needs	of	communities			

	New	private	site	for	devel	opment.
	110 11	privace	3166	101	uc rc	Opinicine

	Existing	public	site	for	intensification	or	extension
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New public site for development

V	New	site	to	be	develo	ped	as	part	of	an	urba	ì
	exte	nsini	า									

			permission

Site ref	Site name)		Settlement	
EH040 Land South of West Road (West of Sawbridgeworth) Sawbridgeworth					
Site address Local authority Size (ha)				Size (ha)	
Land to the south of West R	oad		East Herts Council		14.1
Description of site					
Land to the south of West R	located in the	ne countryside and adjacent	ment site, to accommodate approx to the existing urban area, on the v of the site.		
☐ Source: current una	uthorised	✓ Source: strategic si	ite Source: public owne	ed land	
Source: current auth		Source: site survey	•		
☐ Source: privately pro	omoted	☐ Source: broad locat		•	
Planning history					
There is no known relevant p	lanning histo	ory.			
AVAILABILITY					
The agent has confirmed that	at the potentia	al strategic site is not availal	ble for Gypsy, Traveller and/or Tra	velling Showp	oeple use. Delivery
would require the Council to					
SUITABILITY					
Policy constraints					
	icies: HOU7	Gypsies and Travellers and	C1 Appropriate Development in the Travelling Showpeople; GBR1 Gremes and retail, by 2021)		B3 Land to the
Physical constraints					
Highways - Land to the south by 2021. It is noted that the p dwellings. This is due to the Sawbridgeworth Bypass to n and Travelling Showpeople, The site is considered to be residential vehicle trips gene The site is not considered to	previous EHC combined im nitigate traffic it is assumed suitable for Ce rated by the be suitable f s associated	C assessment provided a "R npacts of both of the sites (S c issues. However for the pu d that the required Highways Gypsies and Travellers, as the development, and would no for Travellign Showpeople. V I with Travelling Showpeople	tial development site, to accommon additional rating for Highways Infrastruction (SAWB2 and SAWB3) located on Warposes of assessing the suitability is Infrastructure can be constructed the vehicle trips are considered to but cause any significant adverse implies the cause and has a narrow carriagew to the cause is limited scope for widening the cause and the cause	ure for developest Road, and of the site for	oment above 500 I recommends a Gypsy, Traveller ature to general ocal road network not be able to
Accessibility to services	5 :				
			within 250 metres. The site is within n station is 1.2 kilometres away.	n 550 metres o	of the nearest
Landscape Impacts					
Scoring = Green. The site lie falling gently east towards a triangular open space at the which lies residential estate (boundary. A small builders' y	es within the I small tree-lin northern end development vard lies just l	High Wych Slopes LCA (LC/ ned watercourse which define d south of west Road forms a t. A row of houses (within Gr beyond the north western co	rcel of land assessed within the Pa A 84). The site consists of one larg es the limit of the settlement; this va a soft and well-defined edge to the reen Belt) adjoins the southern side orner of the site. A public footpath reen Belt within a small area east of	e and one sm regetation con existing settle of West Roa runs along the	aller arable field nbined with a ment, beyond d on the northern southern

Strategy Supporting Paper (area 16B) - Green Belt = Red. Draft Green Belt Review (area 33) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt. The site lies on the western edge of Sawbridgeworth and comprises parcel 10B in Sub-Area A (Area 14) identified in the GBR. The GBR considers that the parcel performs reasonably well in terms of checking sprawl due to its openness, provides a 'critical' contribution to preventing the merging of the town with the village of High Wych to the south west and where there are no alternative strong boundaries that could provide a new robust Green Belt boundary. The assessment considers that the parcel does not provide a particular contribution to safeguarding the countryside from encroachment although this view is not shared by this assessment (see below). The GBR identifies the parcel as a recommended option for development. However, significant local landscape and visual implications are likely to arise from development. Development would represent a very obvious reduction in openness and perception of 'sprawl' due to the open nature of the landscape and the way in which development would extend (or protrude) beyond the clearly defined existing settlement boundary; furthermore there are no other robust defensible boundaries that would be suitable to define the new Green Belt edge (both points are recognised in the GBR). However, if the site were to be released for development there is most likely to be scope to accommodate a G&T development as part of a considered development masterplan.

Other Potential Impacts

Residential amenity of properties adjacent, to the south of the site.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy and Traveller site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale fo development proposed in this location.



DELIVERY

Potential Yield	I
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

Existing private site for either permanent
authorisation, intensification or extension to meet
family needs

Existing	private	site fo	r inte	ensification	or	extensio	n
to meet	wider	needs o	f cor	nmunities			

\square N	ew	private	site	for	develo	nmen
'''	C * *	privace	3166	101	acret	pilicii

	Existing	public	site	for	intensification	or	extension
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New public site for development

V	New	site	to	be	develope	d as	part	of	an	urba	ı
	exte	nsion	1								

$\overline{}$	Frankis a	-24-			
	Existing	site	requiring	planning	permission

Site ref	Site name		Settlement	t					
EH043	North of Hertford		Hertford						
Site address		Local authority		Size (ha)					
Land between Sacombe Roa	ad and Wadesmill Road	East Herts Council		6.0					
Description of site									
Development of 150 homes is an area of greenfield land	will be provided between 2021 and 2026 and previously developed land, which warban area. The remaining part of the site	as previously a nursery, located be	tween the ope	en countryside,					
Source: current unau	uthorised Source: strategic si	ite 🗌 Source: public owne	d land						
☐ Source: current auth☐ Source: privately pro	orised Source: site survey	☐ Source: call for sites							
Planning history									
There is no known relevant planning history.									
AVAILABILITY									
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development.									
SUITABILITY									
Policy constraints									
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT4 North of Hertford (allocation for 150 homes between 2021 and 2026); Physical constraints									
	tifies development of 150 homes will be	provided between 2021 and 2026	to the west of	B158 Wadesmill					
Highways - District Plan identifies development of 150 homes will be provided between 2021 and 2026 to the west of B158 Wadesmill Road / north of Sacombe Road. It is noted that the previous EHC and HCC assessments rated this site Red due to the likelihood that the development would cause significant additional traffic into Hertford and significant extra pressure on Bengeo, which already suffers congestion into the town at peak times. The B158 (particularly around Old Cross, Port Hill and the new Sainsbury's) is a particular pinch-point for congestion and it is unlikely that road upgrades would be able to cope with the cumulative effects. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the required Highways Infrastructure can be constructed and the congestion issues mitigated. The site is considered to be suitable for Gypsy and Traveller. The impact of vehicle trips generated by Gypsies and Travellers would not cause any significant adverse impacts on the local road network are they are largely similar to the existing and proposed residential vehicle trips. The site is also reasonably accessible to sustainable transport modes and it is likely that the development would require an increase in bus service frequencies in the local area. The site is also considered to be suitable for Travelling Showpeople, as the existing (and upgraded) local road network is likely to be able to accommodate a number of larger vehicles accessing the site. The phasing of development will need to ensure that underlying mineral deposits in the locality can be satisfactorily extracted.									
Accessibility to services	5:								
	etres away. The nearest primary school is is within 200 metres. Hertford North train		hin 1.6 kilome	etres of the nearest					
Landscape Impacts									
Scoring = Amber. The site lie 07E). The northern parts are	area 12C) - This site is within a larger pares within the Stonyhills LCA (LCA 69). Papart of an extensive tract of elevated opey form which there are extensive and far andscape.	arcel 07D is currently a nursery with en, sloping and visually exposed a	h allotments to rable land loca	o the south (parcel ated on the western					

Strategy Supporting Paper (area 12C) - Green Belt = Red. Draft Green Belt Review (area 9) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to assisting in safeguarding the countryside from encroachment. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the northern edge of the town and occupies parcel 07D and southern parts of parcels 07A and 07C within Hertford Sub-Area C (Area 07) identified in the GBR. The Green Belt boundary is well defined in this location along existing boundaries. No clear robust boundaries exists further north and the northern site boundary is arbitrary and not a suitable location for a realigned Green Belt boundary. It is therefore recommended that the site remains in Green Belt. The nursery is the only part of the site that is reasonably contained and could accommodate a Gypsy and Traveller development (within Green Belt) without wider landscape and visual harm. Such development being low rise would also minimise impact. As the site is already partially developed, some development would not give rise to a perception of encroachment and there are opportunities to strengthen the existing partially hedged boundaries.

Other Potential Impacts

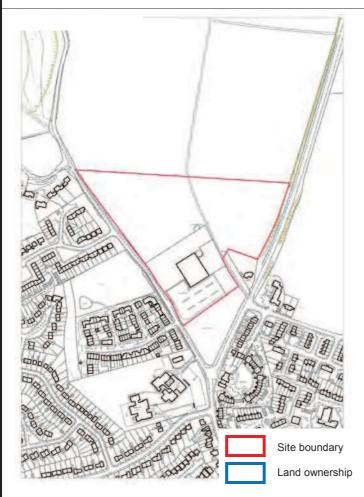
The site is adjacent to allotments and existing residential properties, therefore any development could impact on the amenity of the allotments or existing properties.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release of the whole site from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location and reflect the potential landscape/Green Belt impacts development may have beyond the nursery element of the site.



DELIVERY

Potential Yield	l
2014 - 2018	0
2019 - 2023	0
2024 - 2028	0
2029 - 2031	0

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

Existing private site for either permanent	
authorisation, intensification or extension to n	neet
family needs	

Existing	private	site 1	for	intensification	or	extension
to meet	wider	needs	of	communities		

\square N	ew	private	site	for	develo	nmen
'''	C * *	privace	3166	101	acret	pilicii

		Existing	public	site	for	intensification	or	extension
--	--	----------	--------	------	-----	-----------------	----	-----------

New public site for development

V	New	site	to	be	developed	l as	part	of	an	urba	1
	ovto	ncini	n								

Existing site requiring planning permis		
	cior	n
- LAISTING SITE TEQUILING PRAINING PENNING	2101	ווע

Site ref	Site name Settlement			t		
EH045	Land West of Hertford (South of Welwyn Road) Hertford					
Site address		Local authority		Size (ha)		
Land south of Welwyn Road		East Herts Council		8.8		
☐ Source: current una	uthorised	ite Source: public owne	ad land			
Source: current auth	_	•				
Source: privately pro	_		•			
Planning history						
There is no known relevant p	olanning history.					
AVAILABILITY						
	at the potential strategic site is not availat make provision a policy requirement of d		velling Showpo	oeple use. Delivery		
Policy constraints						
Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH16 Historic Parks and Gardens Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; HERT3 West of Hertford (allocation for 250 homes by 2021); Policy HA8 Historic Parks and Gardens; Policy NE1 International, National and Locally Designated Nature Conservation Sites Local Wildlife Site located to the west and south of the site. Historic Park and Garden located to the south of the site.						
Physical constraints Highways -The development is proposed to consist of 250 homes to the south of Welwyn Road/west of Thieves Lane. The development of the site was rated Red by the HCC due to impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy, Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers as the trips generated are likely to be similar to the existing and proposed residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible by sustainable modes as the District Plan outlines improvements to the walking and cycling environment, and new bus stops and shelters. The site is also considered to be suitable for Travelling Showpeople, as the local road network is likely to be able to accommodate a number of larger vehicles accessing the site.						
Accessibility to services	S:					
	etres away. The nearest primary school is ops within the site boundary. Hertford Nor			tres of the nearest		
Landscape Impacts						
lies within the Panshager Pa to the north west; the wester elevated, broadly level but fa east, where existing develop	area 11B) - This site is within a larger par arkland LCA (LCA 44). It forms a broadly in and southern sides are defined by the lalling gently at the southern end. It is open ament forms a defined and reasonably pro- woodland. From a landscape and visual	rectangular arable field with a narro large block of Blakemore Wood (Al on to view from Welwyn Road to the cominent edge which contrasts stror	ow 'arm' of pas incient Woodla e north and Th ngly with the ru	sture (parcel 06D) and); the land is nieves Lane to the ural character of		

which is defined by the outlying woodland; the separation provided by the adjoining road and productive agricultural use means the site has a largely intact rural character and there is a clear distinction between town and country. G&T development on its own would be inappropriate in this location but, if the area is to be released from Green Belt, there appear to be no obvious constraints to the

incorporation of some G&T development as part of a considered masterplan.

Strategy Supporting Paper (area 11B) - Green Belt = Red. Draft Green Belt Review (area 17) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to assist in safeguarding the countryside from encroachment. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. The site lies on the immediate south western edge of the town and occupies parcels 06D and F within Hertford Sub-Area A (Area 06) identified in the GBR. The GBR identifies most of Area 06 as playing an important role in restricting sprawl, providing little contribution to preventing the merger of towns (and also villages), and assisting in safeguarding countryside from encroachment.

Other Potential Impacts

Residential amenity of properties adjacent, to the north and east, of the site.

Potential impacts on ecology and historic environment, in relation to the Local Wildlife Site and Panshanger Country Park.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location. Alternatively it may be sensible to combine provision across both West of Hertford sites (EH045 and EH044) to provide a single site with 6 pitches/plots.



DELIVERY

Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

Existing private site for either permanent
authorisation, intensification or extension to meet
family needs

Existing	private	site 1	for	intensification	or	extension
to meet	wider	needs	of	communities		

Γ	New	private	site for	developme	'n

	Existing	public	site	for	intensification	or	extension
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New public site for development

V	New	site	to	be	develope	d as	part	of	an	urba	ı
	exte	nsion	1								

_					
	Existing	site	requiring	nlanning	permission

Site ref	Site name Settlement			İ		
EH051	Land West of Hertford (North of Welwyr	n Road)	Hertford			
Site address		Local authority		Size (ha)		
North of Welwyn Road		East Herts Council		11.9		
Description of site						
The strategic site is proposed to provide 300 dwellings to the north of Welwyn Road by 2021. This is an area of greenfield land located in the open countryside and adjacent to the existing urban area, on the western edge of Hertford.						
Source: current auth	Source: current unauthorised ✓ Source: strategic site □ Source: public owned land Source: current authorised □ Source: site survey □ Source: call for sites □ Source: privately promoted □ Source: broad location					
Planning history There is no known relevant p	olanning history.					
AVAILABILITY						
would require the Council to SUITABILITY Policy constraints Local Plan (2007) policies: H. BH16 Historic Parks and Gar		development. C1 Appropriate Development in the	Green Belt; E	:NV14 Local Sites;		
Hertford (allocation for 300 ho Designated Nature Conserva Local Wildlife Site located with		ss and Gardens; Policy NE1 Interna				
Highways - The development proposes 300 dwellings to the north of Welwyn Road. The development of the site was rated Red by the HCC due to impacts on the A414. However for the purposes of assessing the suitability of the site for Gypsy Traveller and Travelling Showpeople, it is assumed that the additional vehicle trips generated and congestion issues can be mitigated. The site is considered to be suitable for Gypsies and Travellers as the trips generated are likely to be similar to the existing and proposed residential vehicle trips, and would not cause any significant adverse impacts on the local road network. The site is also considered to be accessible by sustainable modes as the District Plan outlines improvements to the walking and cycling environment, and new bus stops and shelters. The site is considered to be suitable for Travelling Showpeople, as the local road network is likely to be able to accommodate a number of larger vehicles accessing the site						
Accessibility to services:						
The nearest GP is 2.1 kilometres away. The nearest primary school is within 500 metres. The site is within 2.4 kilometres of the nearest shops. There are three bus stops within the site boundary. Hertford North train station is within 1.4 metres of the site.						
Landscape Impacts						
within the Bramfield Plain LC it is now unmanaged rough g	area 11A) - This site is within a larger par CA (LCA 67) and appears to have been su grassland. To the north west lies a large a	ubject of gravel extraction which ha area of woodland which defines the	as been poorly e upper edge o	restored such that of a local valley		

within the Bramfield Plain LCA (LCA 67) and appears to have been subject of gravel extraction which has been poorly restored such that it is now unmanaged rough grassland. To the north west lies a large area of woodland which defines the upper edge of a local valley which falls away to the north/north west. The field structure appears to have been retained and a triangular field in the north western part of the site is defined by a strong tree belt on the eastern side and is an identified wildlife site. The southern boundary is delineated by a hedge along Welwyn Road, whilst the eastern boundary forms a harsh edge with residential development on the edge of the town. This open relationship with the built up area and the unmanaged 'abandoned' nature of the site detracts from its character. In visual terms the broadly level elevated location of the site benefits from substantial containment provided by the woodland to the north west, vegetation along Welwyn Road and large woodlands beyond, and the adjoining development. In landscape and visual terms this site offers scope for accommodating development and there appear be no obvious constraints to the incorporation of some G&T development as part of a considered masterplan in this location.

Strategy Supporting Paper (area 11A) - Green Belt = Amber.

Draft Green Belt Review (area 7) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt. The site lies on the immediate western edge of the town and occupies parcels 05A-C within Hertford Sub-Area A (Area 05) identified in the Green Belt Review. The GBR identifies Area 05 as playing an important role in restricting sprawl, providing little contribution to preventing the merger of towns (and also villages), and assisting in safeguarding countryside from encroachment. The woodland and road form possible logical long term defensible boundaries, compared with the poorly defined edge that currently exists.

Other Potential Impacts

The site is adjacent to existing residential properties, therefore any development could impact on the residential amenity of existing properties.

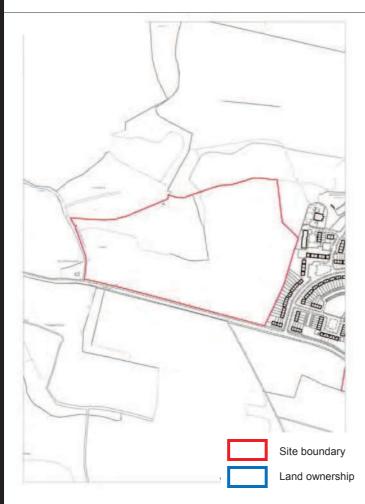
Potential impacts on ecology and historic environment, relating to the Local Wildlife Site and Panshanger Country Park. The area designated as Local Wildlife Site within the site is not suitable for Gypsy and Traveller use.

ACHIEVABILITY

There appear to be no reasons why a Gypsy, Traveller or Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a small scale private Gypsy, Traveller or Travelling Showpeople site, subject to its wider development and release from the Green Belt. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield			
2014 - 2018	0		
2019 - 2023	0		
2024 - 2028	0		
2029 - 2031	0		

Potential occupants

Gypsies and Travellers

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission



Appendix H Assessment of Broad Locations

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Site ref	Site name		Settlement	
EH053	Gilston area		Harlow	
Site address		Local authority		Size (ha)
East Herts Council 712.6		712.6		
Description of site				
The broad location is located across the Stort Valley approximately 500 metres from the edge of Harlow at the nearest point, close to Harlow Town railway station and the employment areas and town centre of Harlow. It is characterised by an area of undulating countryside with a number of features including small streams, woods, hedgerows, and at the centre the landscaped bowl of Gilston Park. The boundary for the broad location is yet to be defined.				
Source: current una	uthorised Source: strategic si	to	d land	
Source: current auth		•		
Source: privately pro			•	
Planning history	Sinotou E Courco. Broad room			
There is no known relevant p	planning history.			
AVAILABILITY				
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development.				
SUITABILITY				
Policy constraints The majority of the site, to the southern part of the broad location, is within the Green Belt. Small parts of the site are designated flood zones 2 and 3, Local Wildlife Sites and Scheduled Ancient Monuments. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH1 Archaeology & New Development. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 3000 homes (2011 - 2031+)); DPS4 Broad Locations for Development; Policy NE1 International, National and Locally Designated Nature Conservation Sites; Policy HA3 Archaeology. Policy GA1 sets out the development requirements for the broad location.				
Physical constraints				
Highways - The proposed development area is a "broad location" to the north of Harlow, around Gilston. This would be a mixed-use development (including a primary school, secondary school, new district centre, and new employment area), providing 5,000 – 10,000 dwellings. It is anticipated that development could commence on site towards the beginning of the 2021-26 period, continuing beyond the timescale of the District Plan (2031). Hence it is estimated that only 3,000 of the overall headline housing anticipated may be complete by 2031, with the site continuing to supply a pipeline of future housing to address local need going forward from 2031 onwards. It is noted that the previous EHC and HCC assessment gave the proposed development a "Red" rating due to the significant highways infrastructure required to enable the development and the significant number of additional trips that would be generated by upto 10,000 dwellings. However, if the issues related to the transport impacts of 10,000 dwellings could be fully mitigated to allow development, than it is unlikely that the addition of Gypsy, Traveller and/or Travelling Showpeople within the site would cause any noticeable issues, providing that a suitable vehicle access can be achieved. As a result, the site is considered suitable. Small areas of the site are within flood zone 2 and 3.				
Accessibility to services:				
There are several bus stops within the site boundary. Harlow Town train station is within 650 metres. The nearest GP is within 2 kilometres, the nearest primary school is within 1 kilometre, and there are shops within 3.5 kilometres.				
Landscape Impacts				
Strategy Supporting Paper (area 69) - The general area, where this broad location is identified, as assessed for a new settlement in the Hunsdon Area. Scoring = Amber. 'The landscape in this corridor is divided on a north-south axis in several locations by watercourses. Despite this, the landscape is gently undulating rather than creased with valleys and ridges.' The area lies within the Stanstead and Pishiobury Parklands LCA (LCA 81). It extends across the rounded and folded northern valley				

It is difficult to see how the northward expansion of the town into this sensitive area could be achieved without significant landscape and visual harm; furthermore the opportunities for achieving connectivity with the existing urban area are constrained by the floodplain.

slopes which possess a reasonably complex and varied landscape character, including parklands, that provides an attractive and contrasting rural northern hinterland to the town. There are some small settlements (Gilston and Eastwick) and scattered farmsteads. Whilst there is a visual inter-relationship with the northern fringes of the town the landscape has a strong rural character and the separation from the town is enhanced by the river valley and the A414 (from which there are views into the area). The northern edge of

the Green Belt is weakly defined along field boundaries, minor lanes and watercourses.

2/3 of the southern part of the site is within the Green Belt.

Strategy Supporting Paper (area 69) - Green Belt = Amber.

Draft Green Belt Review (area 28 and 30) - This site is within a 2 larger parcels of land assessed within the Green Belt Review. The parcels makes a 'Contribution' or 'Limited Contribution' to all purposes of the Green Belt.

This broad location falls within the northern edge of the Green Belt north of Harlow but separated from it by the floodplain of the River Stort. The area was not evaluated as part of the GBR. The river floodplain and transport corridors have defined the northern limit of the town and primarily prevented encroachment into the area beyond, although Green Belt designation has clearly also constrained the prospect of expansion ('sprawl') in this direction. The land does not fulfil the purpose of preventing towns merging.

Other Potential Impacts

There are a number of existing residential properties within the broad location, and any development could impact on the residential amenity of existing properties.

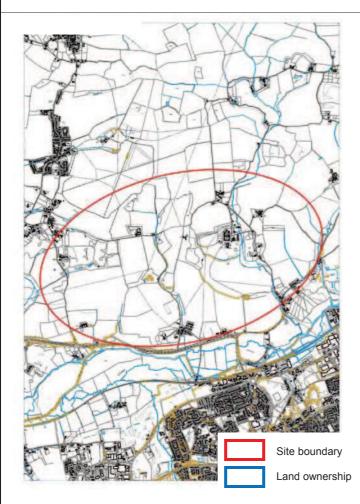
Potential impact on Scheduled Ancient Monuments and Local Wildlife Sites within the broad location.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity would need to be considered proportionate to the scale of development proposed in this location.



DELIVERY

Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	
2031 +	0	

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- $\hfill \square$ Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref	Site name		Settlement	
EH054	North and East of Ware		Ware	
Site address		Local authority	Size (ha)	
		East Herts Council	47.0	
Description of site The Broad location to the North and East of Ware is identified as a Broad Location for Development and delivery after 2021 of between 200 and 3,000 dwellings, subject to further testing through masterplanning, assessing viability and infrastructure planning. This is a large area of agricultural land located to the north and east of Ware. The boundary for the broad location is yet to be defined.				
Source: current una	uthorised	ite Source: public owne	d land	
Source: current auth		•		
☐ Source: privately pro	_			
Planning history				
There is no known relevant p	planning history.			
AVAILABILITY				
	The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development.			
SUITABILITY				
Policy constraints				
Small areas of designated open space in the northern part of the broad location. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; LRC1 Sport and Recreation Facilities. Policy BH16 of the adopted Local Plan identifies two registered historic gardens in the locality at Poles Park (Hanbury Manor) and Fanhams Hall. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 1800 homes across sites North and East of Ware (2011 - 2031+)); DPS4 Broad Locations for Development; CFLR1 Open Space, Sport and Recreation. Policy WARE3 sets out the development requirements for this Broad Location.				
Physical constraints				
Highways - The proposed development area is a "broad location" to the east of Ware. Due to the scale of the potential development, a Development Plan Document would be required (in conjunction with site EH055 – refer to below). The proposed development area would accommodate between 200 and 3,000 dwellings (across both the EH054 and EH055 sites). It is noted that the previous EHC and HCC assessment gave the proposed development a "Red" or "Amber" rating due to the serious access limitations and the significant number of additional trips that would be generated by upto 3,000 dwellings. However, if the transport impacts related to the development of 3,000 dwellings could be fully mitigated to allow development, than it is unlikely that the addition of Gypsy, Traveller and or Travelling Showpeople. Within the site would cause any noticeable issues, providing that a suitable vehicle access can be achieved. As a result, the site is considered suitable for both Gypsy, Traveller and or Travelling Showpeople.				
Accessibility to service	s:			
The site is within 100 metres of a bus stop and 1.1 kilometres of Ware train station. The nearest GP is within 1.1 kilometres, the nearest primary school is within 100 metres, and there are shops within 1.2 kilometres.				
Landscape Impacts				
The broad Location lies within areas identified. Subject to the	area 20A) - This site is within a larger par in the Wareside-Braughing Uplands LCA he extent of the broad location considerat ie two registered historic gardens will nee	(LCA 89). There is a reasonably station to the impact of development f	trong landscape structure in the	

Strategy Supporting Paper (area 20A) - Green Belt/Strategic Gaps = Red.

Draft Green Belt Review (area 13) - This site is within a larger parcel of land assessed within the Green Belt Review. The parcel makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas. It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt.

This area lies on the northern and eastern edge of Ware and comprises Sub-Area B (Area 13) and Sub-Area A (Area 14) identified in the GBR, which is broken down into numerous parcels. The parcels identified as contributing least to purposes and therefore identified for possible release do appear to offer opportunities to accommodate development that is well related to the settlement and may have limited adverse landscape and visual effects. There appear to be opportunities to establish realign the Green Belt boundary along existing features, which could be strengthened as part of the proposals.

Other Potential Impacts

There are a number of existing residential properties within the broad location, and any development could impact on the residential amenity of existing properties.

There are a couple of small areas designated for open space within the broad location.

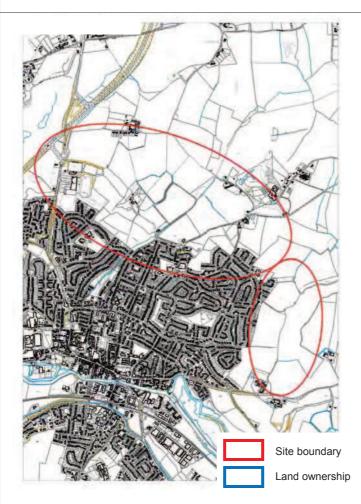
There are a number of constraints, such as the historic environment and local wildlife sites which would not be suitable for Gypsy and

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. Policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity of 15 pitches is considered proportionate to the scale fo development proposed in this location.



DELIVERY		
Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	
2031 +	0	

Potential occupants

Gypsies and Travellers or Travelling Showpeople

Type of use

DEI IVEDV

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission

Site ref	Site name Settlem		Settlement	
EH055	East of Welwyn Garden City Welwyn Garden		den City	
Site address		Local authority		Size (ha)
	-		148.3	
Description of site				
Description of site This is a large area of agricultural land located to the east of Welwyn Garden City. The boundary for the broad location is yet to be defined.				
Source: current unauthorised Source: strategic site Source: public owned land Source: current authorised Source: site survey Source: call for sites Source: privately promoted ✓ Source: broad location				
Planning history There is no known relevant planning history.				
AVAILABILITY				
The agents have confirmed that the potential strategic site is not available for Gypsy, Traveller and/or Travelling Showpoeple use. Delivery would require the Council to make provision a policy requirement of development.				
SUITABILITY				
Policy constraints				
The broad location is on the local authority boundary with Welwyn Garden City, and any development in this location would be required to meet the housing needs of the city. Local Plan (2007) policies: HSG16 Accommodation for Gypsies; GBC1 Appropriate Development in the Green Belt; ENV14 Local Sites; BH16 Historic Parks and Gardens. Draft District Plan (2014) policies: HOU7 Gypsies and Travellers and Travelling Showpeople; GBR1 Green Belt; DPS3 Housing Supply 2011-2031 (Broad Location - approximately 1800 homes East of Welwyn Garden City; DPS4 Broad Locations for Development; Policy HA8 Historic Parks and Gardens; Policy NE1 International, National and Locally Designated Nature Conservation Sites. Policy EWEL1 sets out the development requirements for this Broad Location.				
Physical constraints				
Highways - The proposed development area is a "broad location" to the east of Welwyn Garden City. The site would provide a new district centre, a new employment area, a primary and a secondary school and would accommodate 1,700 dwellings. The previous EHC assessment did not identify any issues in terms of highways infrastructure requirements and potential vehicle access. However, the previous HCC assessment provided a "Red" rating due to the significant amount of additional traffic that would be generated by 1,700 dwellings. However, if the transport impacts generated by 1,700 dwellings could be fully mitigated to allow development, than it is unlikely that the addition of Gypsy, Traveller and/or Travelling Showpeople within the site would cause any noticeable issues. As a result, the site is considered suitable for both uses.				
Accessibility to service	s:			
There is a bus stop within the site boundary and Welwyn Garden City train station is 1.6 kilometres away. The nearest GP is within 1.2 kilometres, the nearest primary school is within 850 metres, and there are shops within 3.5 kilometres.				
Landscape Impacts				
Strategy Supporting Paper (area 61) - This site is within a larger parcel of land assessed within the Paper. Scoring = Green The broad location falls within the Welwyn Fringes LCA (LCA 45) and comprises an extensive tract of land on the eastern side of the built up area, the boundaries of which are generally well defined by woodland and robust tree belts such that there is a clear distinction and threshold between the town and its rural hinterland. This separation has ensured that the rural character of this area is not reduced by the proximity of the town; the land makes a significant contribution to the perception of the Garden City's rural context and setting. A large landfill operation lies south of the B195 Birchall Lane.				

Strategy Supporting Paper (area 61) - Green Belt = Red. 'The area is designated Green Belt, but there are clear boundary limits provided by the A414 and Panshanger Lane, and the distance of over 3km between the edge of this location and Hertford is sufficient to maintain a robust buffer against coalescence. Existing woodland would screen development here when viewed from most directions.'

Draft Green Belt Review (area 16 and 17) - This site is within 2 larger parcels of land assessed within the Green Belt Review. The parcels makes a 'Significant Contribution' to check the unrestricted sprawl of large built-up areas (16) and assist in safeguarding the countryside from encroachment (17). It makes a 'Contribution' or 'Limited Contribution' to the other purposes of the Green Belt. This site lies on the eastern edge of Welwyn and comprises Area 15 identified in the GBR which is broken down into numerous parcels. The area identified in the GBR as a recommended option for Green Belt release comprises parcels 15C, 15G and 15H. Should the area be considered further and be identified for growth the scale of development is likely to provide opportunities to accommodate Gypsy, Traveller and Travelling Showpeople development as part of a well-conceived masterplan..

Other Potential Impacts

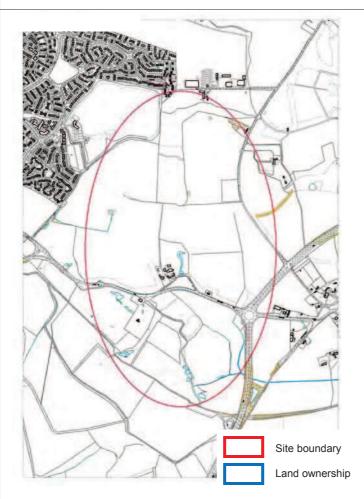
Potential impacts on the historic environment and local wildlife sites.

ACHIEVABILITY

There appear to be no reasons why a Gypsy and Traveller/Travelling Showpeople site could not be developed as part of an urban extension by developers, subject to masterplanning and viability testing of the site. There are a number of constraints, such as the historic environment and local wildlife sites, which would not be suitable for Gypsy and Traveller development, but policy and physical constraints are capable of being overcome and mitigation measures are feasible.

Conclusion

Whilst the site is not confirmed as available, the site is considered to represent a policy option for the Council to deliver a a large Gypsy, Traveller or Travelling Showpeople site, subject to its wider development. Capacity would need to be considered proportionate to the scale fo development proposed in this location.



DELIVERY

Potential Yield		
2014 - 2018	0	
2019 - 2023	0	
2024 - 2028	0	
2029 - 2031	0	
2031 +	0	

Potential occupants

Gypsies and Traveller or Travelling Showpeople

Type of use

Residential

Delivery model

- Existing private site for either permanent authorisation, intensification or extension to meet family needs
- Existing private site for intensification or extension to meet wider needs of communities
- New private site for development
- Existing public site for intensification or extension
- New public site for development
- New site to be developed as part of an urban extension
- Existing site requiring planning permission



Appendix I Design Templates

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(03/(2) = 3.78 = 35.9 = 7(6.7(= 5.7) = 5.9)

8 WHRITH LWW J (D) GVFDSL J (DVXFK(DVP) DWWHKHGJ HURZ V (DVGHMUDE(D) SDUNFX(DVD) LILIWH FRXUDJ HMELRGL HUWW (D) H HUD(D) DW HVSHFLHV (D) G (D) (BZ (P) DL W) D FH (WD) IRUGV (D) J RRG (D) HORI (SUL DF (D) G (VHFXUW Z LWRXW) WHIGHH VL HKRWAD(D) DWWHR (J) DWW (Z DOY) D G (H) FHW (T KDWW) G (H) DFK (D) WHIZ (O) HHG VRIEH (G+M.) HG Z LWW (WH (DSSURSUDW) WHFXUW (P) HDVX (U+M) (D) P L G (DV (SHUW) H3 ROPH V (G) HFX (U+D) (D) HM.) (3) UL FIS (BW (T) KHUHZ (O) EHD FR VICHUDE(D) (G) LIHUH FHILL (WH) HHG V (E) HWZ (H) (XUED (D) G (UXUDO) (BFDWR V (I) RUH) DP SOHO

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8 VHIRITH LVW J (10) GVFDSL J (11) XFK (11) VIP DWUHO KHGJHURZ VIILVICHMUDEÐI SDUNFXÐUÐ ILILVI H FRXUDJIHMELRGL HUMUVIIJH HUDOO DWJHIVSHFLHVIII D GIMORZ IP DL VM D FHTTWOIIRLOND JRRGOH HORIT SULDF ID GWHFXUWZUMRXWMHICHIH VLHKRWMD DWUHRIJDWMTZDOVID GTH FHVT7KDWVDLGTHDFKT VLMIZLOO HHGVREHIGHMJ HGZLUKLVKHIDSSURSUDVM VHEXUMIP HOVXUHVIL IP L GIDVISHUWH 3 ROJEH V 6 HFXUHO 11 HMJ 113 UL FLS®MITKHUHZLODEHO FR VICHUDEONICULHUH FHIL DIKHMH HHGVIEHWIHH 🗆 XUED ID GUXUDOORFDWR VIIRUH DP SON

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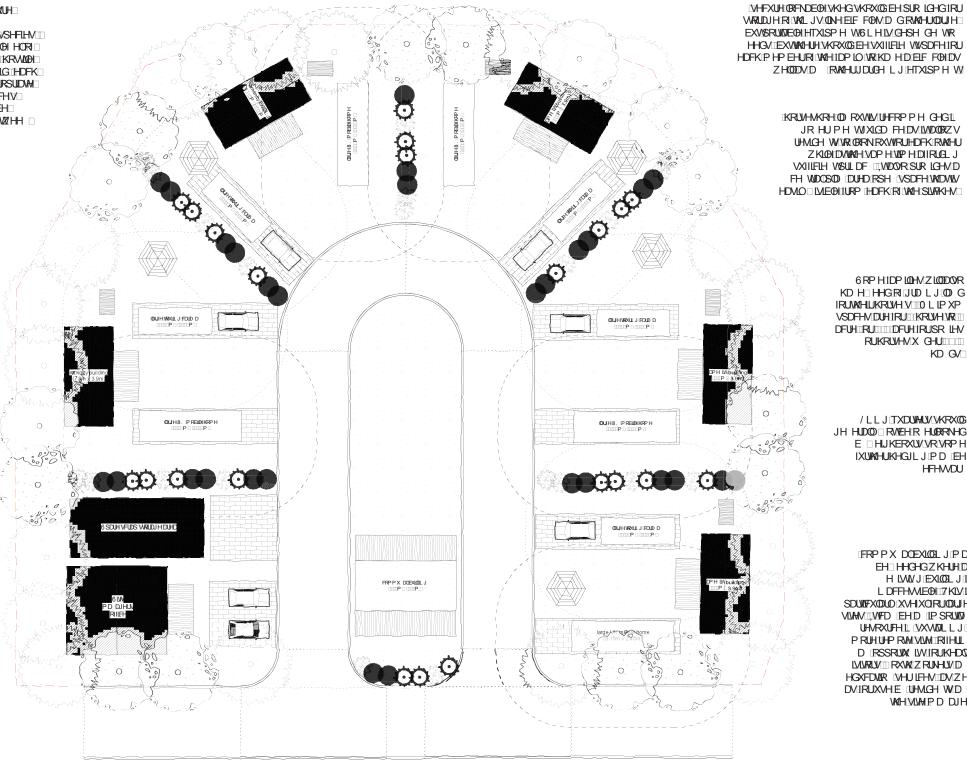
6 SHFLILF DOGGLYR DOVSDFHID DLODEON IRUVFUDS WARUD J HIFD (EHIZ HODKVHG) CHJ II3 LGGOPKL VR □ SV 6 LVM□

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JDL III. WALVIFDM-LVSDFH IRUVDIH VARSSL JIR OLIVI HHG-GIDV WAH VIVALIV VP DODH RXJK VARH VXUH VADWOLAVO FH VARUH XVH FRODFVAR ISRL WII

H VXUHVADWAHUHIMVXIIIFUH WAAU L J IVSDFHIRUD OOUJHP RELIDIKRP HIG VOI GOUGVIRUUHXVHD GIIUHWXFNDFFHWZ LOOJHGVAREHP HWARRIII

D GKRVH10H JVKLWD COUGNDUHPHW7KHMHWD COUGND GRANHUNFD EHIRX GIL I XLOXL J IS HIXOMOR VID GO D XDOIRUG WHHWI

6 RP HIDP LOHN Z LOODOVR KD H H H GRIJUD L J DO G IRUMHUKRUH V 10 L IP XP VSDFHVIDUHIRU KRUVHUR DFUHIRU DFUHIRUSR LHV RUKRUHVX GHU KD GV

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