

# Dacorum Site Allocations DPD Public Examination 2016

Representations on behalf of  
**TRING TOWN COUNCIL**



In respect of  
**Matter 3 – Gypsies & Travellers**  
&  
**Matter 11 – Local Allocation LA5: Icknield Way, West of Tring**

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## 1. INTRODUCTION

- 1.1. Rumball Sedgwick have been appointed by the Clerk to the Tring Town Council (referred to in this Statement as the 'TTC') to submit further representations upon the proposed inclusion of a 5 pitch traveller site within Site LA5 the 'Land to the West of Tring'.
- 1.2. In producing this statement we have liaised with Trevor Standen MA LLB Barrister of Planning Services, Wigginton, who is also advising TTC.
- 1.3. **Appendix 1** to this document is a chronology of TTC's involvement with the LA5 allocation. It is important to note that at the time of the adoption of the Core Strategy in 2013 there was no mention of including a proposed traveller site within the LA5 development and this element was only formally advanced within the consultation upon the Draft Masterplan in the Autumn of 2014.
- 1.4. The TTC considered its response to the Draft Master Plan for Site LA5 at two meetings – the Ordinary Council Meeting held on 20th October 2014 and the Extraordinary Council Meeting (ECM) held on 3rd November 2014. 56 members of the public were present at the former and 157 at the latter. The TTC also contributed to the Community Workshop and commented on the draft Visioning Statement for the overall site allocation.
- 1.5. At the ECM resolution 17549 was passed unanimously.

*RESOLVED: (i) The Council supports the Draft Master Plan for LA5 overall, with the exception of the proposed Gypsy Site. The Council understands and supports the need for Gypsy sites, but the LA5 position on an AONB is totally unsuitable, there are more suitable places to put one.*

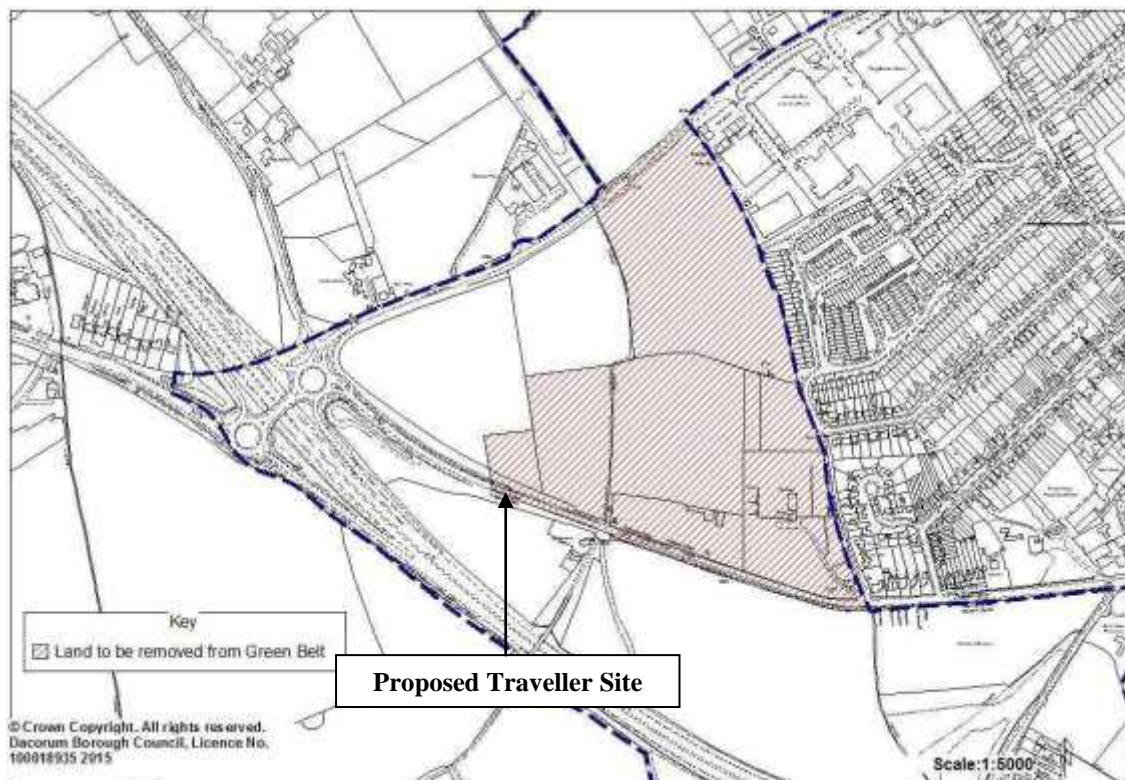
*(ii) The Council's support is subject to adequate provision being made for school places and infrastructure, which it wishes to be specified as soon as possible.*

*(iii) The Clerk is delegated to complete the consultation questions to reflect the Council's considerations*
- 1.6. Within the representations that the TTC submitted in the light of this resolution, the Clerk, Mr Curry, stated; *"whilst accepting the principles of Dacorum's Policy CS22, the Town Council considers the prime location of LA5 as a principal gateway into Tring wholly inappropriate for a Gypsy/Traveller site, however small. The justification of the choice of site was unconvincing amounting to little more than a slavish application of the policy without consideration of context"*.
- 1.7. The TTC remains of this view and wishes to draw the Inspector's attention to policy and other evidence which shows the unsuitability of Site LA5 as a site for travellers.

- 1.8. TTC makes no comment on the matter of financial viability; this being an issue for CALA Homes, the developer of the adjacent housing within the LA5 allocation and owner of the majority of the site. CALA has repeatedly indicated its opposition to the incorporation of a traveller site within the LA5 allocation and were the housing element not to be built; this would lead to the loss of significant levels of planning contributions and therefore preclude the provision of much needed infrastructure.
- 1.9. A landscape consultant, The Alban Landscape Partnership (TALP), was commissioned by the TTC to review the landscape, visual and overall design layout issues arising from the LA5 allocation and the report is attached to these representations as **Appendix 2**.

## 2. SITE & LOCATIONAL MATTERS

- 2.1. Site LA5 is both within the Green Belt and the Chilterns Area of Outstanding Natural Beauty. It is situated at one of the main 'gateways' into the town, close to the Conservation Area and the land forms part of a parcel of land considered to be 'significant' to the setting and special character of the historic town (see Parcel GB03 of the 'Green Belt Review Purposes Assessment' summarised at **Appendix 3** to this Statement).
- 2.2. The proposal in the masterplan for Site LA5 is to remove the Green Belt notation from some of the land and develop it for a mix of uses including housing, employment uses, a cemetery as well as a 5 pitch traveller site. The now withdrawn Department of Communities "*Designing Gypsy and Traveller Sites - Good Practice Guide*" (see **Appendix 3**) provided advice in relation to the facilities needed in addition to the 5 pitches; roadways, amenity blocks, site manager's office, play areas, vehicle parking, services, lighting, waste storage and clear boundary separation between each plot.
- 2.3. Below is 'Figure 3' (taken from the Draft LA5 Masterplan of October 2015), a plan showing "*Land to be Removed from the Green Belt at LA5*".



- 2.4. The traveller site is to be located upon the part of the site which is within the AONB (this is a statutory designation which, unlike Green Belt boundaries, cannot be amended by Dacorum Borough Council). It is this element of the proposed land use mix to which TTC objects.

### 3. THE TRAVELLER SITE ALLOCATION IN THE LIGHT OF PLANNING POLICY AND OTHER EVIDENCE

- 3.1. The relevant policy and other documentation relevant to this representation is summarised at **Appendix 3** (where, to assist the Inspector, the relevant paragraph and policy references are also set out).
- 3.2. **Essential Core Principles** – although local plans should meet “*objectively assessed needs*” specific policies in the NPPF indicate that in certain cases development should be restricted. The identified cases include AONBs and land within the Green Belt. The original statutory purpose of the AONB designation is “*to conserve and enhance the natural beauty of the area*” and Section 85 of the Countryside & Rights of Way Act requires that in exercising or performing any functions affecting land in AONBs, relevant authorities ‘shall have regard’ to this purpose. The NPPF says that generally, where it is necessary to make allocations in a development plan, land of “*lesser environmental value*” should be used.
- 3.3. **The Drive for Sustainable Development** – The NPPF says that the planning system “*should play an active role in guiding development to sustainable solutions*”, having regard to achieving the three ‘dimensions’ of sustainability. In this case planning’s ‘environmental’ role has been given insufficient weight, when an inappropriate land use is being directed to an AONB.
- 3.4. **Promotion of Good Design & Quality Placemaking** – Site LA5 is a prominent ‘gateway’ site, which also performs a ‘significant’ role in preserving the setting of the historic town. Both the NPPF & NPPG emphasise the importance of good design in achieving sustainable development and creating places that “*look good*”; “*last well*”; ‘successfully integrate’; and reinforce “*locally distinctive patterns of development*”. In those regards the landscape consultant, TALP, comments at the final bullet of page 6 of its report (see **Appendix 2**) “*given the importance of maximising screening in such a visually sensitive location (at a town gateway within an AONB) and the very limited space available with which to achieve this through landscaping and internal arrangement, it is recommended that alternative locations are considered*”. In addition, the traveller site’s buildings will not be built in a traditional style, or from the local vernacular materials which are sought by the ‘Chilterns Management Plan’ & ‘Chiltern Building Design Guide’ (**Appendix 3**), as being appropriate and sympathetic to the AONB.

- 3.5. **Protection of the Countryside** – throughout the NPPF, NPPG & PPTS, there is an emphasis upon the protection of AONBs, the Green Belt and the wider countryside generally. The planning system should give “*great weight*” to the protection and enhancement of valued landscapes and, as noted above, development plan allocations should seek to use land of the least environmental value as the default position.
- 3.6. There is no provision for traveller sites envisioned within the ‘Management Plan’ for the Chilterns AONB; a document that has been endorsed by Dacorum Borough Council’s Cabinet as a material consideration in the exercise of its planning powers on 26th May 2015 (and its provisions were also enshrined within the terms of Dacorum Core Strategy Policy CS24); but there are very many policies within the ‘Management Plan’ dedicated to resisting harmful, or inappropriate, development from taking place in this sensitive and fragile environment. Furthermore, the development of traveller sites in the Green Belt (with the attendant structures such as amenity blocks, communal facilities - which according to the withdrawn ‘Good Practice Guide’ “*ideally ...should be situated in a location towards the front of the site*” - manager’s office, hardstanding and lighting) is considered to be ‘inappropriate’ by Government policy. Even if there is “*unmet need*” for additional sites Government policy is clear that this is unlikely to outweigh any Green Belt harm arising from unrestricted sprawl, or encroachment into the countryside.
- 3.7. In this case the land is part of a parcel, which according to the ‘Green Belt Review Purposes Assessment’ (see **Appendix 3**) performs a key Green Belt role, that of preserving the setting of an historic town. The land also helps to stop the spread of the Town into the countryside and its allocation for traveller development will not assist with urban regeneration. Green Belt boundaries “*should only be altered in exceptional circumstances*”, but where they are altered (i.e. where the “*exceptional circumstances*” have been proven), the new boundary must be clearly defined “*using physical features that are readily recognisable and likely to be permanent*”. However, there are no features on the ground that could be used to delineate the new boundary in this case.
- 3.8. Section 5.3 of the TALP report (**Appendix 2**) considers the matter of visual screening, noting: “*the existing screening effect is weak and supplementary native species planting would be required to all boundaries (including new planting to the western and northern boundaries) to provide full containment within the wider landscape and from other areas of LA5, most notably from the public open space and the cemetery extension*”.

- 3.9. As the Chilterns 'Buildings Design Guide' similarly advises (see **Appendix 3** to this document) excessive use of evergreen planting is to be avoided, even when native species are used. TALP's report comments that the limited palette of native evergreens, if planted in too high a concentration would be *"inappropriate in this setting, which is predominantly deciduous"* (**Appendix 2** - TALP Report, page 5, third bullet point).
- 3.10. The TALP report continues on page 5 (fourth bullet point):
- "to provide consistent and effective screening from Aylesbury Road and from all adjacent land uses and to be compatible with the wider landscape context, will require the use of low contoured mounding with native tree and shrub planting over an extended spatial area, possibly impinging onto the neighbouring POS and cemetery site or constricting the available space for caravan pitches and facilities building(s) within the allocated extent of the traveller site shown on the masterplan. The alternatives of 'engineered' embankments with narrow clipped hedges are incompatible with the AONB landscape setting and raises long term maintenance issues".*
- 3.11. TALP also finds that there *"will be a significant visual impact on the AONB throughout the year, particularly in the winter months. Landscape screening will only be able to mitigate this to a limited degree and not at all for the initial 5-10 year planting establishment period"* (**Appendix 2**, page 6, fourth bullet point).
- 3.12. **The Plan Preparation Process** – to be found 'sound', Local Plans should be based on robust, up-to-date and relevant evidence according to the NPPF, NPPG and the PPTS (the latter document requires annual updates of supply). The study upon which Dacorum's Site Allocations document relies is now out of date, following the change in planning policy definition of August 2015 (see **Appendix 3**) which removed the requirement to include those who have ceased travelling permanently from assessments of need. In cases throughout in the Country, this change in definition has had the effect of reducing substantially the need for additional traveller pitches.
- 3.13. It is noted from the 2013 joint Dacorum / Three Rivers 'Traveller Needs Assessment' that the propensity to travel by those occupiers surveyed was very low. If the survey was to be carried out in 2016, using the new definition, Dacorum's need for additional pitches might be found to have reduced quite substantially. Furthermore, the Needs Assessment did find that there was considerable capacity within the Borough currently, with only 54 plots out of the 72 total (75%) being used. It is likely therefore that were the revised needs assessment to be carried out using the new definition any future demand could be met using existing sites.



- 3.14. In examining the merits of the specific LA5 traveller allocation account must also be taken of the impact that the pitches and associated paraphernalia such as the amenity block, and manager's office will have upon the landscape and whether any identified need is better satisfied at any other sites within Dacorum.
- 3.15. An LPA has particular 'duties' in respect of plan preparation, when those policies will affect an AONB. The LPA should give proper regard to the provisions and policies of the relevant AONB's management plan in order to protect the special qualities of the landscape designation.
- 3.16. Although, in the PPTS, the Government instructs LPAs to address any identified under-provision of traveller sites, the location of any new allocations must be "*appropriate*" and the safeguarding the countryside and the natural environment remains an essential consideration and the meeting of any need should not be at the cost of the nation's most valued landscapes.

#### 4. SUMMARY & CONCLUSIONS

- 4.1. Green Belt boundaries should only be changed where there are 'exceptional circumstances' and to justify a variation there must be strong evidence available. In this case the evidence base is weak (see in particular paragraphs 3.10 to 3.12 of these representations), but even if there were strong evidence of need this would still not be sufficient to override the normal presumptions against siting traveller sites within AONBs, or Green Belts.
- 4.2. In examining the merits of the specific LA5 traveller allocation account must also be taken of the impact that the pitches and associated paraphernalia will have upon such a prominent, protected landscape site and the question must be posed as to whether any future need is not better satisfied at one or more of Dacorum's existing sites (significant capacity on existing sites was available in 2013).
- 4.3. Paragraph 182 of the NPPF advises that to be considered 'sound' and therefore compliant with the aim of delivering sustainable development, a Local Plan submitted for examination must be "**Positively prepared**"; '**Justified**'; '**Effective**'; and '**Consistent with national policy**', but as it stands the element of Site Allocation LA5 relating to the proposed traveller site is none of these things.
- 4.4. In overall summary
- The strategy has not been prepared so that it will meet an objectively assessed need;
  - alternative strategies for making any provision have not been properly considered;
  - the allocation of the traveller site is not based upon robust, or proportionate evidence;
  - the resulting Green Belt boundary will not be permanent, or deliverable; and
  - in choosing to make the allocation within the AONB / Green Belt, without evidence of 'exceptional circumstances', the plan is not consistent with national policy.
- 4.5. Accordingly, the Tring Town Council requests that the aspect of the LA5 allocation relating to the making provision for travellers be **removed** from the Site Allocations plan.

## **Appendix 1**

# **Site Allocation LA5 – Chronology of Engagement By The Tring Town Council**

Dates	Event	Highlights/Detail
<b>The Core Strategy</b>		
8 <sup>th</sup> Dec 2008	Initial version of Tring Spatial Strategy issued by Dacorum Borough Council (DBC) following a Tring Place-shaping Workshop held in September.	It identified the need for 465 extra houses. Tring Town Council responded to the ‘Site Allocations Development Plan Document Supplementary Issues & Options’ consultation.
June 2009	CS31. Emerging Core Strategy published	150 houses on either Dunsley Farm or Icknield Way - Tring asked to decide. A display was held on 16 <sup>th</sup> and 17 <sup>th</sup> July 2009 at the Victoria Hall and vote taken (approx. 400 respondents). Icknield Way chosen – the Town Council’s preferred option. Planning Committee finalised and approved the Town Council’s submission 17 <sup>th</sup> August 2009.
25 <sup>th</sup> September 2013	Dacorum adopted the Core Strategy	<p>CS4. Core Strategy Extract on LA5:</p> <p><b>Proposals</b></p> <ul style="list-style-type: none"> <li>• Around 150 new homes.</li> <li>• Playing fields and open space.</li> <li>• Extension to the employment area in Icknield Way Industrial Estate.</li> <li>• Potential extension to the cemetery.</li> </ul> <p><b>Principles</b></p> <ul style="list-style-type: none"> <li>• A mix of two storey housing, including around 40% affordable homes.</li> <li>• A contribution must be made towards educational and community facilities (i.e. both buildings and space).</li> <li>• The layout, design, density and landscaping must create a soft edge and transition with the Area of Outstanding Natural Beauty and secure a defensible long term Green Belt boundary.</li> <li>• Impact on the local road network mitigated through the promotion of sustainable travel options, including pedestrian links onto Highfield Road.</li> </ul>
<b>LA 5 Visioning and Master Plan</b>		
16 May 2013	Workshop to consider ‘Proposal LA5: Development to the West of Tring’, Victoria Hall, Akeman Street, Tring.	<p>Workshop supported by DBC’s ‘Proposed Development at Icknield Way, west of Tring Questions and Answers’:</p> <p><i>“The proposal includes about 150 homes, open space and extensions to the existing cemetery and Icknield Way employment area. The proposal is contained in the Council’s Core Strategy. It is known as a local allocation and referenced as Proposal LA 5...”</i></p> <p>Outcome - ‘West Tring LA5 Community Workshop Final Report July 2013’[LA52]</p>

Dates	Event	Highlights/Detail
Monday 18 <sup>th</sup> November 2013	Tring Town Council Extraordinary Council Meeting	Basis of discussion: internal report: 'Master Plan Draft Visioning LA5 - RB.doc'. It included the Core Strategy extract above.  <a href="#">Comment from TTC on the outline of the draft masterplan principles sent to DBC</a>
9 <sup>th</sup> Sep 2013	DBC document 'LA5: West of Tring – Master Planning'	DBC guidance: <b><i>“May travellers be accommodated here?”</i></b>  <i>There is a need to provide homes for travellers and LA5 is <b>an acceptable location in planning policy terms</b>, provided certain criteria are met. Among other things, the site must be:</i> <ul style="list-style-type: none"> <li>- <i>separated from existing residential areas;</i></li> <li>- <i>small-scale; and</i></li> <li>- <i>designed to a high standard with an open frontage similar to other forms of housing.</i></li> </ul> <i>Any site should be managed in accordance with Government guidelines.</i>  <i>Small-scale on this site would be interpreted as being about 5 pitches”.</i>
July 2014	DBC publish 'Draft Master Plan Cabinet Version'	This is the first reference to Gypsy & Traveller site in LA5: <ul style="list-style-type: none"> <li>• Accommodate around 180 - 200 homes.</li> <li>• Include a significant proportion of affordable housing (40%). Provide a mix of house types, including family homes and larger, more spacious properties.</li> <li>• Include accommodation (i.e. pitches and ancillary facilities) for around five Gypsy and Traveller families. Locate the Gypsy site in the western fields. Provide a landscape screen and take road access from Aylesbury Road.</li> </ul>
July 2014	DBC's updated 'Proposed Development at Icknield Way, west of Tring Questions and Answer' published	“The principle of the development has been accepted by the Council and a lot of work has been done on the master plan which has now been agreed by the Council's Cabinet Committee. There will be consultation on the master plan and Site Allocations document for a period of 6 weeks from 24 September to 5 November 2014”  No mention of Traveller Site. No specific reference to the traveller site in the consultation questionnaire (Lost in 'Homes Principles')
Monday 3 <sup>rd</sup> November 2014	Tring Town Council Extraordinary Council Meeting dedicated to discussion of the LA5 Masterplan.	Resolution supporting LA5 Masterplan [LA47] <b>except</b> the gypsy and traveller site.  <a href="#">Comment from TTC on the LA5 Masterplan sent to DBC.</a>

<b>Site Allocations &amp; Local Allocations – Focussed Changes</b>		
14 <sup>th</sup> Sep 2015	DBC present 'Focused Changes' to Tring Town Council Extra-ordinary Council Meeting	SUB1 & SUB2. Incorporated the changes to the Green Belt boundary.
Oct 2015	'Focused Changes' Consultation on Draft Master Plan	Comment from TTC on the 'Focused Changes' sent to DBC opposing the changes.
<b>Gypsy &amp; Traveller Policy &amp; Provision</b>		
November 2008	'Site Allocations Development Plan Document Supplementary Issues & Options'	'Map 5 Tring Sites Considered' includes the range of possible gypsy and traveller sites considered (the six from the Scott Wilson Report plus D25, suggested by the public in pre-consultation)
December 2008	'Site Allocations Development Plan Document Supplementary Issues & Options: Gypsy And Traveller Consultation'	SA10
31 <sup>st</sup> March 2009	<p>DBC Cabinet Meeting. Purpose of the agenda item:</p> <ul style="list-style-type: none"> <li>• To report the results of consultations on the Supplementary Site Allocations Issues and Options Paper</li> <li>• To assess the Scott-Wilson Report on the identification of potential gypsy and traveller sites</li> <li>• To propose a set of policy principles to be included in the Emerging (Core) Strategy paper for public consultation Summer 2009</li> </ul>	<p>SA8. Local Development Framework: Gypsy and Traveller Issues.</p> <p>Recommendations approved [Para 4.16]:</p> <ol style="list-style-type: none"> <li>1. The policy principles</li> <li>2. To include the option of pitches for gypsy and travellers in the major development opportunities being considered through the preparation of the Core Strategy</li> <li>3. To remove those options listed in para 4.32 for gypsy and traveller sites from further consideration</li> <li>4. To ask the Board of Dacorum Partnership to consider what broad-based action would be appropriate to enable satisfactory integration of new gypsy and traveller pitches with existing communities</li> </ol> <p>Retained options Dunsley Farm D7 and Icknield Way D11, but concluded overall across Dacorum that "no site possibilities are recommended as better options". Note caveat of Para 4.33]</p>

September 2009	'Dacorum Borough Council Local Development Framework Emerging Core Strategy And East Hemel Hempstead Area Action Plan: Issues And Options Gypsy And Traveller Consultation' by Vision twentyone published.	
2008 - 2013	Adoption of the Core Strategy, culminating in 25 <sup>th</sup> September 2013.	<p>Local Allocations – see above.</p> <p>Core Strategy Policy CS22: New Accommodation for Gypsies and Travellers.</p> <p>Core Strategy para. 14.44(c):  <i>“Proximity to services, social inclusion, protection of heritage and important environmental features and conservation of natural resources”</i>. Policy CS22 not an accurate reflection of this.</p> <p>Policy CS22: <i>“Priority will be given to the provision of sites which are defined on the Proposals Map. If other proposals come forward, they will be judged on the basis of the need for that provision”</i>. At odds with Cabinet Report para. 4.33 and selection of the sites in the Proposals Map i.e. not based on identified local need.</p>
July 2013 – July 2014	Draft LA5 Master Plans	Transition from no reference to the inclusion of a gypsy & traveller site in LA5 to its inclusion. Initially this was shown as being adjacent to the Icknield Way Industrial Area with the cemetery extension part of the existing site. It was then switched to the final location accessed from the Aylesbury Road.
<b>Note:</b> August 2012	Dacorum Core Strategy Examination In Public Document SG3	<p>LA53. Statement of Common Ground as agreed between Dacorum Borough Council and Cala Homes (Representor Number 494131) in respect of Local Allocation LA5 Land at Icknield Way, West of Tring and: Representations 771 – 779 from Cala Homes.</p> <p>Makes reference to the inclusion of a gypsy &amp; traveller site – D11 next to the Industrial Estate</p>

## **Appendix 2**

# **Landscape & Visual Design Issues Assessment by The Alban Landscape Partnership**



# Tring Gateway LA5

Landscape & Visual Design Issues

12.5.2016

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## 1.0 Introduction

- 1.1 The Alban Landscape Partnership (TALP) were invited to attend a meeting on site on 2.5.2016 with Tring Town Council to discuss the Concept Masterplan (as shown below) for the area designated as 'Local Allocation LA5' by Dacorum Borough Council (as set out in the emerging Site Allocations Development Plan Document) in respect of landscape design matters relating to the proposed layout for this town gateway location and to summarise this discussion in this short report.
- 1.2 TALP is a registered Practice of the UK Landscape Institute and the partners have been involved with land use design issues and project implementation for over thirty years.

## 2.0 Development proposals

- 2.1 Concept Masterplan taken from 'Site Allocations Development Plan' Dacorum BC Oct 2015

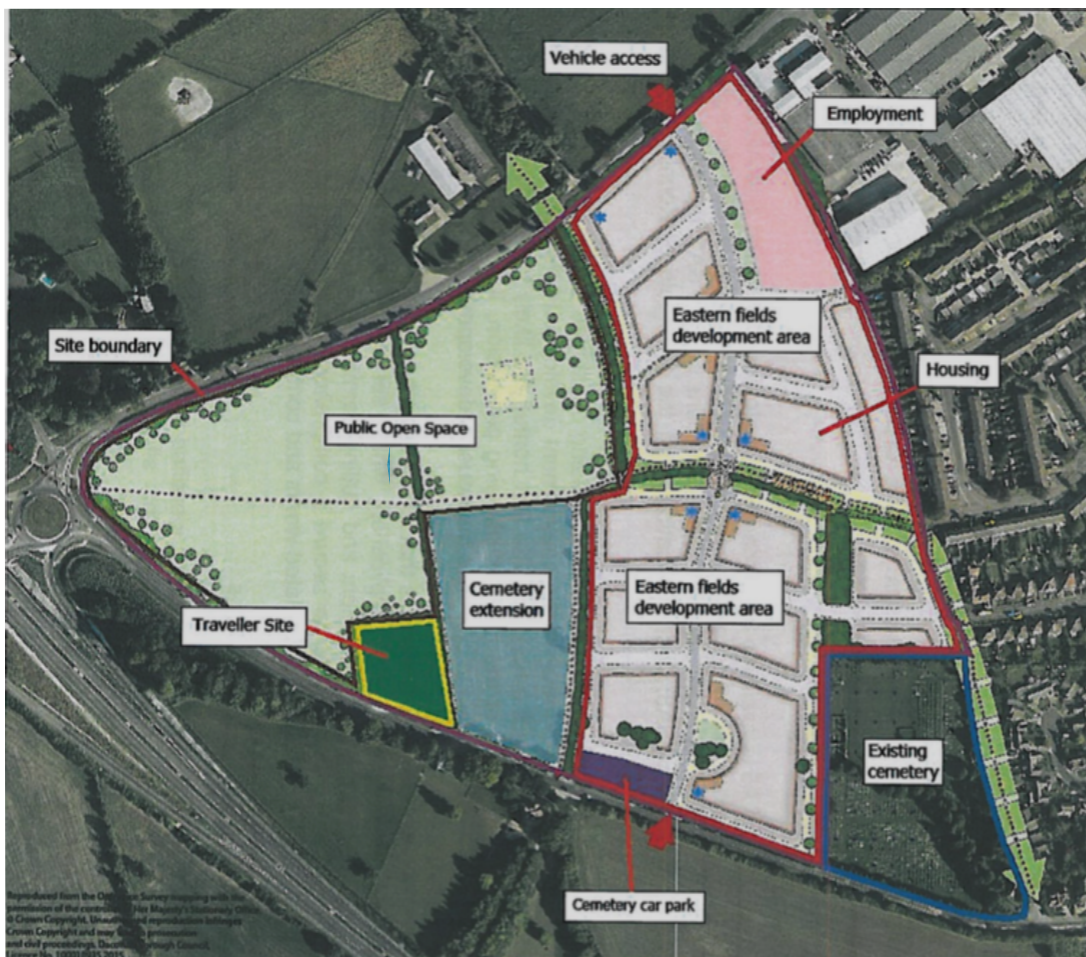


Figure 1: Concept Masterplan



North

### 3.0 The Existing Site

3.1 The site at present consists of agricultural land divided by established hedges set in the context of a gently undulating landscape, characterised by long views out to the West and South, revealing the AONB as a mosaic of fields, mature hedgerows, tree belts and woodland. The AONB rises to the south east to meet the dramatic, steep wooded slopes of the Chilterns escarpment. Whilst we have not carried out a formal assessment we believe that these features combine to form a landscape of high visual quality, worthy of the AONB status.

### 4.0 Landscape & Planning Designations

4.1 The whole of LA5 is designated as 'Green Belt' (Dacorum Local Plan 1991-2011 Saved Policies & Dacorum Core Strategy 2013)

4.2 The following areas of the concept masterplan are designated as Chilterns AONB:-

- Cemetery Extension
- Traveller Site
- Public Open Space

4.3 Mr. Fearn at A2.25 and A2.26 refers to the relevant policies applicable to this AONB

### 5.0 Design Considerations

The following issues were discussed:-

#### 5.1 Housing Development

- In this important 'gateway' location the opportunity should be taken to provide unique and distinctive housing design that emphasises local character (eg. brick and flint walls, tiled roofs, traditional street patterns and integrated green infrastructure) in accordance with The Chilterns Building Design Guide (Chilterns Conservation Board 2010).
- A central hub / retail centre within the development would help to offset a number of vehicle journeys into and out of the site.
- Proposed residential areas have retained important landscape features as defined by Barton Willmore's LVIA on behalf of Cala Homes dated August 2012):-
  - Hedgerows H2 & H6 to form the development 'edge'
  - Hedgerows H3, H4, H5 and Tree Belts TB 2/3/4 & 6 within the housing development itself, as structure planting.
- It is recommended that these features are supplemented with additional planting of native species trees and shrubs to plug gaps, broaden width, maintain height and increase biodiversity.
- An important consideration is to maintain the screening function of the retained landscape features during the winter months with appropriate species mixes (to be agreed with the project ecologist) that include native evergreens (Ilex, Ligustrum).

- The provision of the new residential area therefore provides an opportunity to improve the urban edge of Tring through the retention and enhancement of the main hedgerow and tree belt network. The benefits of this may be summarised as:-
  - Landscape integration through the creation of a positive green edge to the AONB/ Development interface in keeping with the landscape character of the AONB
  - It will provide a clear definition of the Green Belt boundary
  - Visual containment of the new development, minimising landscape and visual intrusion of the residential area on the AONB
  - There will be resultant enhancement of site biodiversity and ecological benefits in accordance with the broad aims and specific policies of the Chilterns Conservation Board's AONB Management Plan eg:-
    - Policy L8 "Landscapes close to existing and new areas of development should be maintained and enhanced to conserve, enhance and extend: natural capital; green infrastructure; character and amenity; biodiversity; and opportunities for recreation."
    - Policy B7 "Ecological networks should be conserved and enhanced through landscape scale initiatives".

## 5.2 Cemetery Extension

- A cemetery extension area (detached from the existing cemetery) with provision for natural/woodland burials is envisaged within the AONB
- In terms of effective landscape design, natural burial sites are characterised by a mosaic of woodland, open spaces with wildflower meadow, parkland trees within grass and retained existing hedgerows and tree belts (such as those along the north side of Aylesbury Road). In this format and with appropriate design the cemetery extension a) will be fully integrated into the wider landscape of the AONB and b) will not result in any significant visual impact upon the urban edge of Tring or the wider rural context.
- New planting with native species will play an important role in achieving these objectives, providing an appropriate setting for woodland burials, screening the residential site to the east, together with integrating the site into the wider landscape.
- The site is already screened from the higher land to the south by the existing tree belt on the south side of Aylesbury Road.
- The provision of natural burial space will include the establishment of woodland interspersed with wildflower meadow that can be configured to integrate the site into the adjacent Public Open Space in addition to increasing overall species biodiversity and the spatial extent of various habitat types, again in accordance with the recommendations of the AONB Management Plan.



### 5.3 Traveller Site

- It is envisaged within the schematic masterplan that a traveller site (mobile home pitches with a facilities building(s) is provided within the Green Belt /AONB, adjacent to the western boundary of the Cemetery Extension with access from Aylesbury Road (pictured opposite).



- Existing screening of the site consists of the tree belt to the south of Aylesbury Road together with existing hedgerows and self-set native vegetation on the north side of the road and on the eastern boundary of the proposed site. Together these provide some degree of visual containment from the east and south. However the existing screening effect is weak and supplementary native species planting would be required to all boundaries (including new planting to the western and northern boundaries) to provide full containment within the wider landscape and from other areas of LA5, most notably from the public open space and the cemetery extension.
- Whilst native deciduous hedges and tree belts are not transparent entities during the winter months, a degree of evergreen planting with native species would be required to maintain effective screening throughout the year, if this element of the masterplan is implemented. Native evergreens (Scots Pine, Privet & Holly) provide a limited design palette from which to create a natural looking mix and if planted in too high a concentration within a planting mix (along with deciduous native species) the resulting appearance will be inappropriate in this setting, which is predominantly deciduous.
- Whilst Policy CS22 requires traveller sites to be provided with 'open frontage' this may not preclude landscape enclosure. However, to provide consistent and effective screening from Aylesbury Road and from all adjacent land uses and to be compatible with the wider landscape context, will require the use of low contoured mounding with native tree and shrub planting over an extended spatial area, possibly impinging onto the neighbouring POS and cemetery site or constricting the available space for caravan pitches and facilities building(s) within the allocated extent of the traveller site shown on the masterplan. The alternatives of 'engineered' embankments with narrow clipped hedges are incompatible with the AONB landscape setting and raises long term maintenance issues.



- There are numerous published design guides and examples of implemented schemes, however, effective design layout is unique to each site and there is no blueprint applicable to all. The key design criteria in this sensitive location in terms of minimising visual impact, will be a) the location of the main amenity building (or individual amenity buildings for each pitch if required) and pitches away from the main axis of the entrance road and b) the blending of spatial requirements for the facilities building(s), caravan pitches, communal areas such as play spaces and vehicle manouvering with requirements for effective landscape planting/screening in the context of the AONB setting and without compromising adjacent land uses.
- Caravans and amenity buildings at approx 3m high (plus possible pitched roofs extending building height to approx 4-5m) on land that is already higher than the main road into Tring, further reinforces the requirement for comprehensive landscape mounding and planting.
- The amenity building(s) will need to be designed in local vernacular style in accordance with the Chilterns AONB Management Plan and Chilterns Building Design Guide if it is to be in keeping with the landscape setting.
- Lighting within the site, to reasonable residential levels (on land that is higher than the main road into Tring) will be a significant visual impact on the AONB throughout the year, particularly in the winter months. Landscape screening will only be able to mitigate this to a limited degree and not at all for the initial 5-10 year planting establishment period.
- Regarding access and egress to/from the site, the DMRB (Design Manual for Roads & Bridges - Volume 6, section 2, part 6, TD41/95) sets out visibility splay requirements of 2.4m x 215m (with the x-dimension possibly extending to 4.5m subject to traffic engineering advice), for a lightly used access for a maximum of 6 dwellings and one vehicle wishing to join the road at one time. In either case, the majority of the existing hedgerow/self-set vegetation on the northern side of Aylesbury road could be retained and incorporated within the belts of landscape screening described above. However the requirement to accommodate possible emergency vehicles will dictate that the roadway entrance will be considerably wider (up to 6m) than at present and hence the removal of existing vegetation.
- Given the importance of maximising screening in such a visually sensitive location (at a town gateway within an AONB) and the very limited space available with which to achieve this through landscaping and internal arrangement, it is recommended that alternative locations are considered, either within existing sites elsewhere or incorporated into other proposed sites and that the land becomes part of the POS.

#### 5.4 Employment Site

- The employment area (an extension of the existing zone adjacent to the NE corner of the site) will provide a very limited amount of office / light industrial use due to road access and parking requirements.
- Integration with adjacent proposed housing will require retention of existing hedgerows and site boundary vegetation together with new screen planting.
- As recommended for the housing site, the opportunity should be taken to design high quality business premises that strongly reflect local character in design, layout and materials in accordance with the Chilterns Building Design Guide.



#### 5.5 Public Open Space

- The western end of LA5 lies entirely within the AONB.
- The boundaries of the POS site are characterised by existing hedgerows and/or developing self-set thickets of native vegetation (Hawthorn, Ash, Oak etc). These thickets can reasonably be expected to attain a height of 5m+ in approximately 5 years time and thereafter to heights of 6-8m (with individual trees in excess of this) within 10-15 years, ensuring assimilation of the site into the wider landscape.
- At this stage, when combined with the landscape structure planting associated with adjacent residential, cemetery extension and possibly traveller's site land uses, immediate views into and out of the POS will be fully contained (unless strategic viewpoints are identified and retained at detailed design stage).
- The landscape of the surrounding AONB currently visible from the POS is characterised by a mosaic of fields, woodlands, thickets, copses and mature hedgerows. The existing developing vegetation and structure planting envisaged are entirely in keeping with this pattern.
- The retention of any such existing landscape features should therefore form an integral part of any overall landscape strategy for the POS and LA5 generally, in accordance with the AONB Management Plan.
- Additional planting could be used to provide a number of attractive landscape features within the POS and connecting with proposed adjacent land uses:-
  - Open parkland of wildflower meadow with native tree planting



- A merging of planting within the POS into that of the woodland cemetery.
  - Reinforcement of the existing boundaries
- The parkland design could be developed to incorporate a number of leisure uses, including a network of paths and cycleways linking with existing routes and natural play areas.

## 6.0 Summary & Design Recommendations

### 6.1 Overall Design Mix

- The location of LA5 as a Gateway to the town and especially one within such a high quality AONB landscape setting, requires that land-use and the design of the built and natural environments must be appropriate.
- The development mix has, in outline, been accepted by TTC, but there remains scope for discussion with the developer regarding:-
  - architectural detail to enforce local distinctiveness
  - Refinements to the housing layout including a central hub/ neighbourhood centre
  - Detail layout of the POS
  - Detail layout of the Cemetery extension to make provision for natural burials
  - Screening provision throughout LA5
  - Integration into the AONB

### 6.2 Traveller Site

- The traveller site will require extensive screening in order to minimise its visual impact (particularly with regard to lighting) and to blend it into the wider setting of the AONB. This may conflict with Policy CS22 which requires open frontage.
- Landscape screening will only be able to mitigate visual impact (lighting, amenity building(s) and caravans) to a limited degree and not at all for the initial 5-10 year planting establishment period.
- The majority of built development proposed for LA5 is not in the AONB and is contained by the existing established hedgerows and tree belts that follow the natural landform.
- The proposed location for the traveller site is beyond the defined green-edge of the Development/AONB interface and is therefore an intrusion into the AONB landscape and an inappropriate feature for a town gateway location.
- The traveller site will require extensive screening in order to minimise its visual impact. However, this will in turn emphasize its presence and it is therefore inappropriate in this location.
- Locations for the caravan pitches could be considered within existing sites or as additions to other proposed sites in less visually obtrusive locations.

### 6.3 Landscape & Ecology

- Given the AONB and Green Belt status of LA5, landscape proposals throughout the development should seek:-
  - To retain existing features (Trees, hedgerows and developing vegetation)



- To enhance such features with additional native species planting wherever necessary
- To maximise biodiversity through habitat creation and management.

#### 6.4 Summary

The above represents the initial design views of The Alban Landscape Partnership following a first visit to the site on 12.5.2016 and discussions held with Tring Town Council. It is intended that these notes form the basis for further discussion with the Council and the Developer at detail design stage.

Andrew Cambridge  
Partner  
The Alban Landscape Partnership  
12th May 2016

## Appendix 3

### Synopsis of Relevant Planning Policy As At September 2016

#### INTRODUCTION

- A2.1 In respect of Government policy reference should be had to the provisions of the National Planning Policy Framework (NPPF), the National Planning Policy Guidance (NPPG) and the latest revision (dating from August 2015) to the Planning Policy for Traveller Sites (PPTS).
- A2.2 **Essential Core Principles** – The presumption in favour of sustainable development is at the heart of the NPPF and “*should be seen as a golden thread running through both plan-making and decision-taking*” (paragraph 14). That same paragraph continues that for plan-making this means that:
- “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless...*
- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development should be restricted”. Amongst the types of restricted location are AONBs and land within the Green Belt.*
- A2.3 Paragraph 17 of the NPPF sets out 12 “*Core planning principles*” that the planning system ought to play, and which “*should underpin both plan-making and decision-taking*” and these include: “*conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework*”;
- A2.4 **The Drive for Sustainable Development** – According to paragraph 7 of the NPPF, there are three dimensions to sustainable development: ‘economic’, ‘social’ and ‘environmental’.

- A2.5 Paragraph 8 of the NPPF continues *“these roles should not be undertaken in isolation, because they are mutually dependent...to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions”*.
- A2.6 **Promotion of Good Design & Quality Placemaking** – NPPF paragraphs such as 56-65 of the NPPF appear beneath the heading *“Requiring good design”*. Paragraph 56 states *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”*.
- A2.7 NPPG paragraph 001 (Reference ID: 26-001-20140306) *“Why does good design matter?”* states that *“achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations. Good design responds in a practical and creative way to both the function and identity of a place. It puts land, water, drainage, energy, community, economic, infrastructure and other such resources to the best possible use – over the long as well as the short term”*.
- A2.8 NPPF paragraph 58 continues *“Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:*
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
  - *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
  - *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- A2.9 Where design is poor and *“fails to take the opportunities available for improving the character and quality of an area and the way it functions”*, paragraph 64 of the NPPF says that it should be refused.
- A2.10 The protection and promotion of landscape and townscape character also appears at NPPG, paragraph 007 (Reference ID: 26-007-20140306) which states that:

*“development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture....The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre. When thinking about new development the site’s land form should be taken into account....Good landscape design can help the natural surveillance of an area, creatively help differentiate public and private space and, where appropriate, enhance security”.*

- A2.11 **Protection of the Countryside** – throughout the NPPF, NPPG & PPTS there is an emphasis upon protection of AONBs, the Green Belt and the wider countryside. The statutory purpose of the AONB designation is *“to conserve and enhance the natural beauty of the area”*). Section 85 of the Countryside & Rights of Way Act 2000 requires that *“relevant authorities”* (which includes local planning authorities) in exercising or performing any functions affecting land in Areas of Outstanding Natural Beauty, have a duty to have regard to that purpose. Under the heading *“Conserving and enhancing the natural environment”* NPPF paragraphs 109, 110 & 115 state that the planning system should give *“great weight”* to the protection and enhancement of valued landscapes and when *“preparing plans....the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”*.
- A2.12 *“Great importance”* is also attached to the protection of Green Belts and *“inappropriate development is, by definition, harmful”*. *“Traveller sites (temporary or permanent) in the Green Belt are inappropriate development....and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances”* (NPPF, paragraphs 79 & 87 and PPTS paragraphs 16 & 27). *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”* (NPPF, paragraph 79). Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances.
- A2.13 The NPPF sets out ‘five purposes’ of Green Belt at paragraph 80 which include: checking the unrestricted sprawl of large built-up areas, *“safeguarding the countryside from encroachment”*; preserving the *“setting and special character of historic towns”*; and assisting in urban regeneration, through *“the recycling of derelict and other urban land”*.

- A2.14 Once Green Belt boundaries have been set they *“should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”*. Green Belt boundaries should be clearly defined *“using physical features that are readily recognisable and likely to be permanent”* (NPPF, paragraphs 83 - 85 and PPTS paragraph 17).
- A2.15 **The Plan Preparation Process** – The NPPF requires that all Local Plans should be based on adequate, up-to-date and relevant evidence (see paragraphs 158 -159) and that due weight should be given to relevant development plan policies according to their degree of consistency with the Framework (paragraph 215).
- A2.16 The PPTS document also confirms the Government’s continuing intention that the process of providing traveller sites should be plan-led, based on robust evidence, with annual updates of the supply of sites. Where an authority *“has special or strict planning constraints across its area”* targets should be set on a *“cross-authority basis”* to give greater flexibility. The Government aims *“to increase the number of traveller sites in appropriate locations [our underlining] with planning permission, to address under provision and maintain an appropriate level of supply”*. However, the protection of local amenity, the natural environment and the Green Belt from inappropriate development remains essential (see PPTS, paragraphs 4 & 10, as well as Policies A & B).
- A2.17 For the purposes of the planning policy in the August 2015 PPTS *“gypsies and travellers”* are defined as:  
*“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 dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”*.
- A2.18 This is a change (which is shown underlined below) from the Government’s March 2012 definition which read:  
*“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 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”*.
- A2.19 Paragraph 182 of the NPPF says that to be considered ‘sound’, a Local Plan submitted for examination must be:

- **“Positively prepared”** (being *“based on a strategy which seeks to meet objectively assessed development and infrastructure requirements”*);
- **‘Justified’** (it *“should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”*);
- **‘Effective’** (*“the plan should be deliverable”*); and
- **‘Consistent with national policy’** (*“the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”*).

A2.20 There are additional ‘duties’ (conferred by Section 85 of the Countryside & Rights of Way Act 2000) in respect of plan preparation when the policies affect AONBs and local planning authorities *“should have regard to management plans for National Parks and Areas of Outstanding Natural Beauty, as these documents underpin partnership working and delivery of designation objectives. The management plans highlight the value and special qualities of these designations to society and show communities and partners how their activity contributes to protected landscape purposes”*. These management plans *“contribute to setting the strategic context for development by providing evidence and principles, which should be taken into account in the local planning authorities’ Local Plans and any neighbourhood plans in these areas”* (NPPG paragraphs: 003 & 004 Reference ID: 8-004-20140306).

## **OTHER EVIDENCE BASE**

### **Dacorum Borough Council And Three Rivers District Council Traveller Needs Assessment 2013**

- A2.21 Within Dacorum paragraphs 2.7 & 2.8 found that there are 36 traveller pitches in the Borough giving a total capacity of 72 caravans (up to 60 caravans at Three Cherry Trees Lane, Hemel Hempstead and a further 12 at Long Marston), as well as 11 plots for show-people. At the time of the Study the most recently available figure for caravans in the Borough (January 2012) showed that there were 54 traveller caravans sited in Dacorum, all of which were on the two public sites (see paragraph 2.13).
- A2.22 This study noted (at paragraph 5.8) that *“85% of respondents reported that they had not travelled at all during the last 12 months”*.
- A2.23 The *“Overall Need”* for Dacorum to 2031 under the previous traveller definition was estimated at an additional 17 pitches (see paragraph 7.27), with a further requirement for 3 extra plots for ‘Showmen’ over the same period (paragraph 7.44). Paragraph 7.45 states that any requirement for ‘Showmen’ could be *“accommodated on existing sites or through expansion or making more efficient use of land. Therefore there is not a clear need to allocate specific sites for the growth in the Showmen population”*.

### **Green Belt Review Purposes Assessment November 2013**

A2.24 The Borough's Green Belt land was assessed by consultants and divided into parcels. The parcel that included the LA5 site was annotated as GB03 "*Green Belt Land South West of Tring*". The parcel was noted as making a "*significant contribution towards preserving the setting of Tring and Tring Park... Overall the parcel contributes significantly towards 1 of the 5 Green Belt purposes*".

### **Chilterns Area of Outstanding Natural Beauty Management Plan 2014 – 2019 (endorsed by the Dacorum Cabinet on the 25<sup>th</sup> May 2015)**

A2.25 According to paragraph 3, this document contains a number of broad aims and detailed policies for the management of the Chilterns AONB to be "*achieved by the Board and all other parties with an interest in the AONB*". Paragraph 4 continues "*the Plan is not solely for the Board but is a guide for local authorities, statutory agencies, local organisations, landowners, businesses, communities and all those whose activities influence the AONB*".

A2.26 No provision is made for accommodating travellers within the AONB, but amongst the Management Plan's various policies which could be viewed as relevant in this instance are:

- **L1** "*The overall identity and character of the Chilterns should be recognised and managed positively*".
- **L4** "*The distinctive character of buildings, rural settlements and their landscape setting should be conserved and enhanced*". The explanatory text to this policy notes that "*a primary characteristic of the Chilterns landscape is the large number of attractive towns and villages, buildings, farms, barns and churches. It is the combination of their charm and setting in the landscape that contributes so much to the special qualities of the Chilterns and reinforces what is distinctive about the area*".
- **L5** "*Developments which detract from the Chilterns' special character should be resisted*". The explanatory text here stating "*the town and country planning system and other regulatory and advisory processes need to be in place and applied to ensure that damaging changes are prevented*".
- **L7** "*The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns*". The explanatory text to this policy raises the importance of appropriate landscape and visual assessments being undertaken.

- **L8** *“Landscapes close to existing and new areas of development should be maintained and enhanced to conserve, enhance and extend: natural capital; green infrastructure; character and amenity; biodiversity; and opportunities for recreation”.*
- **D1** *“The natural beauty of the Chilterns AONB should be conserved and enhanced by encouraging the highest design standards, reinforcing local distinctiveness and respecting the landscape, settlement character and special qualities of the AONB”.*
- **D2** *“High standards of development which respect vernacular architectural styles and demonstrate appropriate best practice in the use of traditional materials (flint, brick, roofing materials and timber) should be promoted”.*
- **D9** *“Full account should be taken of the likely impacts of developments on the setting of the AONB”.*
- **D12** *“Developments should be sought that represent the highest environmental and design standards whilst complementing the character of the AONB”.*

#### **Chilterns Buildings Design Guide February 2010**

- A2.27 *“The Chilterns Buildings Design Guide provides guidance on ways in which the outstanding and distinctive qualities of the Chilterns AONB can be conserved or enhanced when building takes place. This can include new buildings, extensions, conversions, redevelopment, and alterations to the environment of streets and public spaces within settlements”* (paragraph 1.10).
- A2.28 The Design Guide was produced in the light of the Management Board’s concerns *“about the detrimental impacts of urbanisation on the special qualities of the AONB”* and it is intended to be used by *“all involved in the development process”*, including planning authorities. Paragraphs 1.15 & 1.21).
- A2.29 The Guide makes the point, at paragraph 1.3, that *“the most notable feature of the characteristic vernacular buildings in the AONB, both in villages and elsewhere, is the consistent use of materials, especially the flints that occur in both the chalk strata and the overlying clay with flints. Flint is often combined with brick, both in the walls of older buildings and in boundary walls around gardens. Most vernacular buildings also have tiled roofs, with the tiles often having been made from local iron clay. Thatch appears relatively infrequently, with notable concentrations in the northern and southern extremities of the AONB”.*



- A2.30 On the matter of planting paragraph 3.95 states that *“if the location of a building is right and the site planning has been sensitively carried out there should be no need for new planting to screen a building from view. Screening alone should in any event be avoided since it usually suggests that other more basic considerations have been neglected”*.
- A2.31 Paragraph 3.98 requires the use of *“locally thriving, native species”* within any planting scheme and counsels against use of non-native evergreens that *“look out of place and can quickly get out of control”* (picture caption page 43).

**Department of Communities “Designing Gypsy and Traveller Sites” - Good Practice Guide May 2008 (withdrawn)**

- A2.32 Although the document was withdrawn on the 1<sup>st</sup> September 2015, it has yet to be replaced. This Guide aimed to provide developers and planning authorities *“with the key elements necessary to design a successful site”* and so it would not be unreasonable to assume that its advice could continue to be heeded in relation to the design of new traveller sites, until such time as a successor document is available.
- A2.33 According to paragraph 4.10 the overall site perimeter boundary must be clearly and physically demarcated to prevent incursions from additional travellers seeking to move on to the site without permission.
- A2.34 Paragraphs 4.26 - 4.29 deal with access matters and explain that to enable emergency access, no caravan or park home should be *“more than 50 metres from a road”*. Vehicular access and gateways must be at least 3.1 metres wide. Generally, roadways should not be less than 3.7 metres wide and *“where possible, site roads should be designed to allow two vehicles to pass each other” (minimum 5.5metres)”*.
- A2.35 Paragraph 4.38 recommends the inclusion of a communal recreation area for children. For reasons of surveillance, such areas should not be secluded, or close to boundary perimeters (paragraph 4.40).
- A2.36 Chapters 5-7 of the ‘Good Practice Guide’ deal with the facilities needed on a permanent site and include services, such as water, electricity, sewerage/drainage, lighting (in order to *“illuminate access roads and access to residential pitches”* – paragraph 5.22), waste storage arrangements as well as the built development, including communal facilities, amenity blocks (which paragraph 5.37 says *“ideally...should be situated in a location towards the front of the site”*), site manager’s office, vehicle parking areas and individual plot boundary treatment. There is no standard plot size, but one or two pitches should be designed where possible to cater for larger mobile homes (paragraphs 7.9 & 7.10).