



**MAKE YOUR VOICE HEARD**

# **Section 4**

# **Housing**



### HOUSING

- 4.1 A core task of the new Local Plan is to provide for the housing needs of Medway's communities over the plan period. As demand for housing has increased across the country, costs have risen and many people from different sectors of society have difficulties in finding a suitable place to live. Although house prices in Medway are lower than neighbouring boroughs, they have been rising in recent years, placing many properties beyond the reach of local people. The private rented sector doubled in Medway between 2001 and 2011, partly linked to the growing student population, but also reflecting demand from people unable to access home ownership. As Medway's population grows and ages, there is a need to ensure the right mix of housing is available for local people.
- 4.2 The Government has put increasing the supply of housing at the centre of its ambitions for the country. The NPPF places a strong direction on local planning authorities to significantly boost the supply of housing. Recent Government initiatives and further measures anticipated in the forthcoming Housing White Paper will provide additional investment to stimulate housebuilding across the country.

#### Housing Need

- 4.3 In preparing the new Local Plan for Medway, the council commissioned a Strategic Housing and Economic Needs Assessment to provide evidence on the housing needed in Medway over the plan period. This was carried out in line with Government requirements to identify the objectively assessed need for housing as a core component of the Local Plan process. Using Government guidance, the assessment analysed demographic, economic and market signal information to determine the quantity and types of housing needs. The technical assessment concluded that the Local Plan needs to provide for 29,463 new homes over the plan period.
- 4.4 The Strategic Housing Market Assessment also considered the range, type and mix housing needed in Medway. This included the need for 'affordable housing', the size and mix of homes, and those with particular needs, such as older people, people with disabilities, younger person households, minority ethnic groups, and rural households. The assessment identified a high level of demand for affordable housing at 17,112 over the plan period. The council has identified potential options for development locations to meet the housing needs identified for Medway over the plan period. The scale of projected housing need requires consideration of locations that could accommodate development on a large scale. Planned growth in such locations offers the opportunity to deliver a range and mix of housing types, to provide homes suitable for different groups in society. Infrastructure, services, green spaces, shops and employment areas would also be planned as part of new residential areas to provide balanced growth.



- 4.5 Further work through the consultation on Development Options and supporting technical studies will help determine the capacity of areas to accommodate development and the most sustainable locations for growth. Specific sites will be allocated in the draft Local Plan when it is published for further consultation.

### **Policy Approach: Housing Delivery**

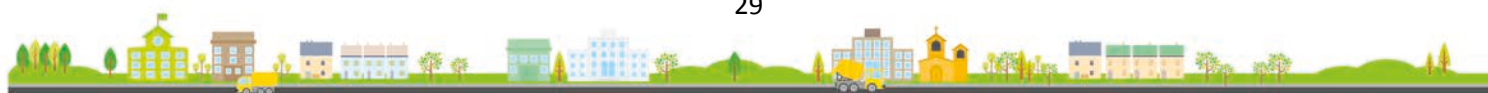
The council will seek to provide a supply of land to meet the needs for market and affordable housing for 29,463 homes over the plan period, meeting the principles of sustainable development.

Allocations for sites and broad locations for development will be established in the Local Plan, phased to ensure a supply over the plan period.

Housing delivery will be required to contribute to the development of sustainable communities, with the coordination of infrastructure and service provision. Masterplans will be produced for major residential schemes in broad locations identified in the Local Plan.

### **Housing Mix**

- 4.6 The National Planning Policy Framework requires local planning authorities to make provision for a wide choice of high quality homes in mixed, sustainable communities. A key element of this is matching supply of accommodation to need, striking the right balance for a changing population with changing needs over time. Medway's communities require a variety of housing, including in terms of tenure, to provide appropriate housing options for different households including families with children, couples, single person households and older people. Information has also been assessed for people with disabilities, students, and gypsy, traveller and travelling showpeople.
- 4.7 Findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015 revealed that:
- Respondents' properties being too small was the most common reason for those describing their accommodation as not meeting their needs.
  - Two thirds of those who wanted to move stated that a two bedroom property was their preferred choice
  - Over half of emerging households stated that a two bed property would suit their needs.
- 4.8 A variety of housing types and sizes, including plots for self-build, will be required to assist in achieving balanced and sustainable communities. However the council recognises that not all sites will be able to accommodate the full range of types needed. The Council will therefore take into account the nature and location of the scheme and, in particular, whether there are any genuine reasons why a mix of types cannot be delivered in practice, or would be harmful to the setting of a heritage asset for example.



### *Household type and size*

- 4.9 Analysis of the 2014-based household projections indicates that Medway is predicted to see a notable increase in single person and small family households. Single, older male households increase by one quarter, and households with one child will increase by one fifth by 2035. Overall Medway has an above average household size at 2.44 persons compared to 2.36 nationally, however this is predicted to fall to 2.33 in 2035 (2.22 nationally). Changes in household sizes have been taken into account in calculating the scale of housing needed over the plan period. It is noted that Welfare Reform could increase the number of people under 35 years looking to rent a room rather than a self-contained home, due to changes in eligibility for support of housing costs.

#### **Policy Approach: Housing Mix**

The council seeks to ensure that a sufficient range of sustainable housing options are provided to adequately meet the needs of the wide ranging needs of a growing and changing population.

Residential development will be permitted to encourage a sustainable mix of market housing to include an appropriate range of house types and size to address local requirements.

The mix must be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood.

Accommodation requirement as detailed in the Strategic Housing Market Assessment 2015 (or any future updates) will be used to help inform which house sizes and mix should be delivered in urban and rural areas to meet the objectively assessed needs of the area.

In relation to affordable housing, the council will expect the submission of details of how this information has been used to justify the proposed mix.

Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's Housing Strategy team at the pre-submission stage of the planning process.

Large development schemes must demonstrate that sufficient consideration has been given to custom and self-build plots as part of housing mix.

The council will work with partners to facilitate the provision of suitable specialist and supported housing for elderly, disabled and vulnerable people.

Gypsy, Traveller and Travelling Showpeople accommodation requirements will form part of the borough's need for housing



## **Affordable Housing**

- 4.10 The costs of housing have been rising steadily in recent years, and are now unaffordable for many people. Income levels in Medway are lower than the average in neighbouring areas, and this adds to the difficulties experienced by many residents in accessing housing, either for rent or purchase. In planning for housing to meet the full needs of the local area, the council needs to make appropriate provision in its housing policies.
- 4.11 As noted above, the Strategic Housing and Economic Needs Assessment identified a need for 17,112 affordable dwellings over the plan period. However the Local Plan needs to be deliverable, and must demonstrate that the policies are viable. Initial analysis indicates a percentage of 25% affordable housing could be achieved on developments over 15 units. Some areas could support a higher proportion of affordable housing. Further work is required to test the viability of the Local Plan and policies, informed by upcoming advice on Starter Homes, and an understanding of the locations, scale and mix of development that will be identified as housing allocations in the new plan.
- 4.12 In preparing the Local Plan, and determining the location and scale of housing allocations, the council will consider and test the delivery of affordable housing, and make appropriate provision in the housing policies to deliver affordable housing that meets the locational requirements (particularly in rural areas), size, type and tenure required by local people, as identified in the SHENA, or subsequent updates to the evidence base.

## **Starter Homes**

- 4.13 The Government has identified that many people struggle to get access to home ownership and is promoting 'Starter Homes', provided at a 20% discount from market prices, to support access to the housing market for people under 40 years.
- 4.14 Further advice on the requirements of Starter Homes legislation is anticipated shortly in conjunction with the Housing White Paper. The council will consider the updated policy position and make provision as appropriate in its housing policies and allocations in the Local Plan. It will give careful consideration to the potential impact of the deliverability of affordable housing to meet the needs of Medway's residents.
- 4.15 There are potential concerns on the impact on viability and the ability to secure sustainable development supported by the infrastructure and services needed by residents. Further work on viability testing for the preparation of the Local Plan will take account of the potential impact of the Starter Home regulations.



### **Policy Approach: Affordable Housing and Starter Homes**

The council will make provision in the Local Plan for affordable housing, in line with the evidenced needs of the area and viability tests. The policy will establish a development size threshold for provision of affordable housing, and criteria for assessing the requirement for on-site provision.

The council will have regard to updated Government policy for Starter Homes and develop an appropriate policy response in the Local Plan.

### **Older People**

- 4.16 While Medway's population is predicted to increase by a fifth over the next twenty years, growth in the older cohorts of the population is most significant. Growth in the over 65's account for just over half of the overall population growth in Medway with an extra 31,000 older residents by 2035.
- 4.17 The 2014-based household projections show a significant increase in single person households in the older age groups, representing more than half the overall increase in single households in Medway. Males aged 65-74 show the most significant increase over the next twenty years.
- 4.18 Medway's vision for Adult Social Care is to support the people of Medway to live full, active lives and to live independently for as long as possible. This includes elderly people and disabled people, and planning for people living with dementia.
- 4.19 One of the strategic aims of the Medway housing strategy is to 'improve flexibility of accommodation'. The council is working with partners towards solutions to allow the elderly and residents with physical disabilities to live independently in their own homes with adaptations to suit their individual needs.
- 4.20 Official statistics show that there is a significant need for adapted social rent accommodation with around 44% of tenants reporting a need for disability related housing design adaptations. This is higher than the Local Authority average across England at around 35% of tenants (DCLG (CORE) Social Housing letting statistics, 2014/15).
- 4.21 The Government's Lifetime Neighbourhoods Initiative identified the following findings of official research into older person's preferences for accommodation choices:
- 'The majority of people would prefer to remain in their own homes as they grow older, and where possible can make changes and adaptations to their properties should their needs change. Also those people who chose to move to housing schemes especially for older people that offer care and support in their own homes express high levels of satisfaction with their homes'.
- 4.22 Evidence from the Projecting Older People Population Information (POPPI) website illustrates that an ageing population is likely to lead to an increase in demand for both housing and schemes that offer an element of care. Over the next fifteen years the



number of over 65's unable to manage at least one self care activity or at least one domestic task on their own is likely to increase by just over 50%.

- 4.23 Traditionally, specialist accommodation for older people has consisted of sheltered accommodation, residential homes and nursing homes. 'Extra Care Housing' provides for a more flexible form of care for older people, which allows for a greater degree of independence and a lower likelihood of need for more intensive forms of support.
- 4.24 The Medway Extra Care Housing Needs Analysis 2011 concluded that 'there is clear scope to widen the range of housing and support options available to older people across tenures with the need for specialist housing services to enable the growing number of older people to live independently'. It identified that 'there is currently no extra care housing for rent, and no extra care housing for sale or shared ownership, although there are a number of schemes in the pipeline'.
- 4.25 The Medway Strategic Housing Needs assessment indicated 'a need for good quality, smaller units to encourage downsizing', while the housing needs survey underpinning this suggests that few residents stated a specific 'need of supported or extra care housing, although this may be a more hidden need' (Integrated Growth Needs Assessment report, SHENA, 2015).
- 4.26 Remaining within one's home with adaptations was the most popular option for older people when asked about care needs over the next five years. This was in preference to sheltered accommodation, extra care housing and residential care homes (Housing Needs Survey, SHENA, 2015). However many live in potentially unsuitable accommodation. The findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015, revealed that the vast majority of households in the sample that contained an older resident had not had any special adaptations (88%) – indicating a possible unmet housing need.

### **People with disabilities**

- 4.27 The 2011 Census identified 43,400 people in Medway who considered that their day to day activities were limited a little or a lot by a disability or limiting long term illness.
- 4.28 Official Labour Market statistics (NOMIS, as at May 2016) record 13,200 Disability Living Allowance claimants.
- 4.29 The Projecting Adult Need and Service Information website (PANSI) estimates that in Medway in 2015 there are around 16,800 people aged 18-64 with a moderate or severe physical disability. This number is projected to rise to 18,200 (+10%) by 2030.
- 4.30 The total population aged 18-64 predicted to have a serious physical disability in Medway in 2015 is 3,800, projected to rise to 4,200 (+11%) in 2030.
- 4.31 PANSI data estimates that there are 4,200 adults (aged 18-64) with learning disabilities in 2015 in Medway, projection data estimates that this number will rise to 4,400 (+8%) in 2030.





(PANSI projections as at November 2016).

### **Evidence of specialist housing need**

4.32 Findings of the Housing Need Survey under the Strategic Housing Needs Assessment 2015 revealed that:

- Around 20% of respondents were in a household where a family member had a limiting physical disability, of which ninety-three percent had no special adaptations made to their property, indicating a potential unmet need.
- Varying level of care requirement were reported, however the need for help with physical tasks was the most reported issue.
- In summary the proportion of households containing one or more members affected by disability suggests implications for housing needs, particularly in relation to adaptations and improvements / facilitating in-home care.

### **Policy Approach: Supported Housing, Nursing Homes and Older Persons Accommodation**

The development of specialist residential accommodation for older people, including care homes, nursing homes and other specialist and supported forms of housing for those with particular needs will be supported where it:

- Meets a proven need for that particular type of accommodation.
- Is well designed to meet the particular requirements of residents with social, physical, mental and or health care needs.
- Is easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and visitors. Local services are particularly essential in those developments where residents have fewer on site services and greater independence.
- Will not lead to an excessive concentration of non-mainstream residential uses to the detriment of the character of the particular area.

### **Student accommodation**

4.33 Medway's student population has continued to grow across the further and higher education sectors, largely clustered in the Learning Quarter at Chatham Maritime. The council needs to take account of the needs of students as a sector of Medway's communities. Positive planning for students can contribute to Medway's regeneration objectives and boost the vibrancy and vitality of town centres, and secure benefits for the growth of the local economy. However it is important to ensure that the expansion of the sector does not adversely affect established neighbourhoods by an over concentration of students and that existing privately rented accommodation is not 'lost' to tenants with otherwise limited housing options.

4.34 In 2014 there were estimated to be around 1,200 bed spaces in institutional accommodation in Medway between University of Greenwich, Canterbury Christchurch, University of Kent and the University of Creative Arts. Since then a





further 530 student rooms have been provided at Liberty Quays (2013/14), with plans for further student accommodation provision in the pipeline.

- 4.35 The highest concentration of students are seen in Gillingham North and River wards, at approximately fifteen percent of the resident population, as these areas are within close proximity to the learning institutions.
- 4.36 Unlike some traditional student cities, evidence points to a 'not insignificant' section of students remaining living at home while studying in Medway, some commuting in from London, for example, as well as students at the Canterbury campuses being bused in from Medway, due to accommodation shortages there.
- 4.37 Students represent approximately six percent of the Medway population, however student households represent less than one percent of private housing stock, which equates to less than three percent of the private rented stock in Medway\*, suggesting that purpose built student accommodation may be sufficiently serving the current local student demand. Growth in student numbers does not easily translate into a direct accommodation need for the reasons mentioned above. Evidence shows that private rental sector accommodation in Medway does not meet the housing requirements of students\*, however the newly created, purpose built student developments should address these shortcomings.

*\*Understanding the Housing Requirements of Students in Medway, ORS, 2014.*

#### **Policy Approach: Student Accommodation**

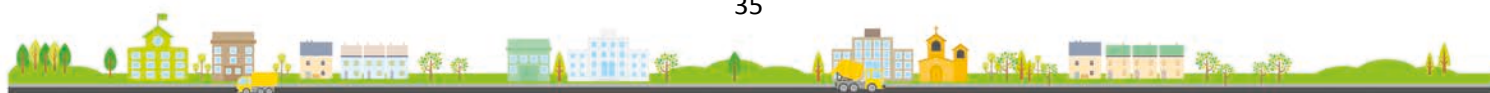
This council aims to ensure that student housing is provided in the most appropriate and accessible locations and has due consideration to surrounding land uses.

Provision for students will be predominantly located close to the higher and further education establishments in Medway where there is deemed to be an identified local need. The council will favourably consider opportunities for student accommodation in town centres where the development can be shown to make a positive contribution to the vitality and sustainability of the centres, and does not have a negative impact on the core functions of the town centres.

These locations must be well served by public transport and accessible to a wide range of town centre, leisure and community uses.

Student accommodation will be permitted where it does not involve the loss of permanent, self-contained homes, or the loss of designated employment land or leisure or community space.

Student housing will be required to provide a high quality living environment and include a range of unit sizes and layouts with and without shared facilities to meet requirements of the educational institutions they serve.



## Mobile homes and residential caravan parks

- 4.38 Mobile homes make up just under one percent (2011 Census) of the overall housing stock in Medway, which is in line with the Kent level but is around double the national rate.
- 4.39 The majority of occupied caravan/mobile homes in Medway are in the two main residential caravan parks in the Hoo Marina Park and the Kingsmead mobile home park at Allhallows.
- 4.40 Mobile homes are an affordable and attractive housing option for a number of households in Medway. For that reason the council supports the retention of mobile homes in these parks to assist in the supply of affordable accommodation. Park home sites and mixed sites of both residential park homes and holiday homes are subject to an updated site licensing regime that came into force on 1st April 2014.

### Policy Approach: Mobile Home Parks

The council seeks to protect existing parks from competing uses, but restrict their expansion outside designated areas. It will restrict intensification beyond density guidelines and seek opportunities to enhance the design and visual impact on the surrounding area particularly those near areas of sensitive environmental interests.

Any development that may result in the permanent loss of mobile homes at the Hoo Marina Park or the Kingsmead Mobile Home park, or a reduction in the area available for their use will not be permitted.

The council will set out criteria by which it will consider the development of new mobile homes or caravans outside of existing sites.

Intensification within the footprint of existing sites must adhere to latest Model Standards for Caravans in England.

Any proposals for updates or intensification must have careful consideration for the colour, massing and materials used, incorporate appropriate landscaping and have no adverse impact on the character of the locality or amenity of nearby residents.

## Houseboats

- 4.41 There are approximately 250 houseboats in Medway and around 400 moorings, many of which are located at sites near Hoo Marina and south of Rochester. Regeneration plans for waterfront development could impact on some sites. However redevelopment plans could lead to improvements to the local environment around the areas where houseboats are located, leading to better access to key services in conjunction with better clustering of houseboats on the River Medway.
- 4.42 Many of the houseboats in Medway have limited facilities, including for waste disposal and can have negative environmental impacts. Opportunities to upgrade facilities and amenities will be supported where there will be no adverse environmental impacts.



### **Policy Approach: Houseboats**

The council will seek to manage provision for houseboats in order to secure environmental benefits and address needs for this specialist type of accommodation. It will aim:

- To protect the current mooring locations of houseboats and specify where any further growth may be allowed to take place.
- To specify criteria under which any further growth of houseboats will be allowed in order to minimise impact.

### **Houses of multiple occupation**

- 4.43 Official statistics estimate that there are approximately 350 Houses of multiple occupation (HMO's) in Medway\*, but this is considered to potentially under-record this form of accommodation.
- 4.44 Evidence shows that areas with particularly high concentrations of HMO's can potentially lower the standards of amenity experienced by local residents, due to disturbance and poor usage of waste storage facilities. A combination of issues can lead to an area attracting a high proportion of young, single people which may be linked to short-term tenancies and a relatively high turnover of residents. This can conflict with the amenity of more settled residents within the same neighbourhood. Standards of facilities in HMOs can vary and where of poor quality can present unhealthy living conditions.

*Source - \*DCLG – Housing Strategy Statistical return (HSSA), 2011.*

### **Policy Approach: Houses of multiple occupation**

The council seeks to avoid detrimental over concentrations of HMOs. Where planning applications for houses in multiple occupation (HMOs) are not already covered by permitted development rights, they will be favourably considered where they:

- Do not adversely affect the character and amenity of the area.
- Do not contribute to the over concentration of HMOs in a particular area.
- Do not contribute to the generation of excessive parking demands or traffic in an area.
- Make appropriate provision for the storage of waste



## **Self Build and Custom Housebuilding**

- 4.45 The Government recognises that there is demand from people wanting to build their home, and wishes to support this sector, to broaden the range of housing types available and contribute towards the supply of housing. It has provided policy to support greater provision being made for people wishing to build or commission their own home.
- 4.46 The Self Build and Custom Housebuilding Act, 2015 placed a duty on certain public authorities to keep a register of individuals and associations who wish to acquire serviced plots of land. The Local Planning Authority must have regard to this register when preparing a Local Plan, and making decisions on planning applications. Further legislation and guidance has been provided by Government in 2016 through the Self Build and Custom Housebuilding (Register) Regulations and the Housing and Planning Act. Medway Council set up its register on 1 April 2016. In the first 6 months of operation, the council received 15 applications to be included on the register, indicating an interest for up to 19 serviced plots. There was interest in sites across Medway.
- 4.47 The council's Strategic Land Availability Assessment, in identifying where land may be available and suitable for development over the plan period, includes 3 sites submitted by landowners and developers specifically promoted for self build. One of these sites is already being built out, another has received outline planning permission for residential use, and the third is currently being assessed by the SLAA for suitability. The council is considering the potential to assess other sites that may be suitable for self build housing, including sites that were below the minimum capacity criteria for the SLAA.
- 4.48 The council will assess the need for custom and self build housing in providing for the supply of housing through the Local Plan.



### **Policy Approach: Self Build and Custom Housebuilding**

The council will assess the need for self build and custom housebuilding, and provide an appropriate policy basis in the Local Plan. It will:

- Identify land as part of the wider strategic area for the new Medway Local Plan which could include self build provision.
- On large site applications, consider a policy which ensures that the developer has given due consideration to allocating a portion of the site to self build/custom build plots.
- Seek opportunities for serviced plots self build/custom build where there is identified demand, when developers with an existing permission approach the council seeking to expand/intensify the development
- Support the consideration of self build and custom housebuilding in the preparation of Neighbourhood Plans.
- Consider opportunities for self build housing in disposal of council land and in promoting regeneration schemes.

### **Gypsy and Traveller Accommodation**

4.49 In 2012 Medway Council commissioned a gypsy, traveller and travelling showpeople Accommodation Assessment (GTAA).<sup>2</sup> It concluded that within Medway there were approximately 510 gypsies, travellers and showpeople based on data from the 2011 census, the majority of whom lived in 'bricks and mortar' accommodation.

4.50 The study recorded 13 sites used by gypsies, travellers and travelling showpeople across the authority. The sites were categorised as follows:

- 1 socially rented site
- 6 authorised permanent private sites
- 1 authorised temporary site
- 4 unauthorised sites; and;
- 1 yard for travelling showpeople

4.51 The study assessed the needs of the gypsy, traveller and travelling showpeople population from 2013 to 2028. It identified the need for 22 extra pitches for gypsies and travellers, but no need for additional pitches for travelling showpeople. The assessment divided the need into 5 year blocks from 2013. In the short-term to 2018 there is a need of 4 additional pitches, which can be met by the present level of planning permissions.

4.52 In the Planning Policy for Traveller Sites, published in 2015, Government introduced a revised definition of gypsies, travellers and travelling showpeople and set out its

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<sup>2</sup> Medway Gypsy and Traveller Accommodation Assessment 2013



approach to decision making and plan making in relation to traveller sites. The overarching aim of the national policy 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.'

4.53 National policy defines gypsies and travellers 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.'*<sup>3</sup>

4.54 The definition of travelling showpeople is:

*'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 own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers ....'*<sup>4</sup>

4.55 The Medway GTAA published in 2013 identified that a number of gypsy and traveller households never or rarely travelled, and could therefore fall outside of the scope of the revised definition. In response to the national policy changes the council has reassessed the evidence in the GTAA. Initial assessment indicates that the requirement for additional pitches up to 2028 could be significantly reduced.

4.56 The council is seeking to refresh the evidence base for the assessment of the need for gypsy, traveller and travelling showpeople accommodation, in line with the Government policy issued since the 2013 GTAA report, and anticipating further guidance in this area. Consideration will be given to potential changes in travelling patterns amongst these communities. The assessment will also be projected to the end of the plan period. During the Issues and Options consultation the Council consulted on the level and type of provision needed for gypsy, traveller and travelling showpeople and how this could be achieved. The responses varied, however concerns were raised as to the location of new sites and there were preferences for dispersed sites. The level of need was suggested to be modest. The majority of responses were received from local residents, rather than wider stakeholders.

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<sup>3</sup> Planning Policy for Traveller Sites, August 2015

<sup>4</sup> Planning Policy for Traveller Sites, August 2015





## Policy Approach: Gypsy, Traveller and Travelling Showpeople Accommodation

### Safeguarding Existing Sites

Existing sites shall be safeguarded from loss either permanently or, if a temporary permission had been granted, until the expiry of that permission when any new application will have to be reassessed based on its merits.

### New Sites

- **Meeting needs** – the council will make provision for the identified need for gypsy, traveller and travelling showpeople accommodation needs within the plan period, to be established by a refreshed GTAA.
- **Location** – Sites should be sustainably located with access to local facilities for educational, medical care and convenience retailing. Sites should not be isolated, but should respect the existing communities to avoid disturbance and maintain amenity.

Sites should not be located in the Green Belt, flood risk zones 2 & 3, areas covered by environmental designations (i.e. AONBs, SSSI's, SPAs, SAC & Ramsar), protected open spaces, or significant heritage designations (listed buildings & scheduled ancient monuments).

- **Scale** – Sites should respect their location and surrounding environment and should be embedded within it, not intruding onto the landscape.
- **Access** – Sites should enable safe and convenient pedestrian and vehicle access to the road network, with adequate space for vehicle parking, turning and servicing.
- **Need** – The existing need of communities should be considered in decision making and the availability of alternative accommodation will also be a consideration.
- **Type of site** – New sites should be transit sites to correspond to the new definition of gypsies and travellers as outlined in the Planning Policy for Traveller Sites

