

Traveller Site Selection Methodology

Introduction

1. Epping Forest District Council ("the Council") is required to make provision for traveller sites within the Local Plan. This note explains the proposed process for site selection for traveller site allocations (TSSM) within the Epping Forest District Local Plan ("the Local Plan") – Draft Local Plan consultation. It should be read alongside the Site Selection Methodology (SSM) for residential and employment uses and sets out the points at which the TSSM will interact with the SSM. Stage 8 of the TSSM has been updated following the Regulation 18 consultation and associated analysis of representations to outline the process that will be followed to identify proposed traveller site allocations in the Regulation 19 Pre-submission Local Plan. With the exception of the introduction and Stage 8, the rest of the TSSM remains unchanged from the version published in October 2016 as part of the Draft Local Plan consultation.
2. It is essential that the site selection process is undertaken having full regard to, and be consistent with, current Government policy on traveller sites. The proposed methodology therefore takes careful account of DCLG's Planning Policy for Traveller Sites (PPTS) (revised, August 2015) in conjunction with the National Planning Policy Framework (NPPF). The review of the methodology in February 2017 also took into account the proposed amendments to the NPPF identified in the Housing White Paper *Fixing our broken housing market*.

Government Planning Policy and Guidance - Planning policy for traveller sites

3. PPTS sets out current Government planning policy and should be read in conjunction with the NPPF. It distinguishes between plan making and decision taking on planning applications. Local plans must be prepared with the objective of contributing to the achievement of sustainable development.
4. PPTS (paragraph 3) states that "*the Government's overarching aim 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*". To help achieve this, the PPTS sets out in paragraph 4 the aims in respect of traveller sites which are:
 - "a. *that local planning authorities should make their own assessment of need for the purposes of planning*
 - b. *to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites*
 - c. *to encourage local planning authorities to plan for sites over a reasonable timescale*
 - d. *that plan-making and decision-taking should protect Green Belt from inappropriate development*

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- e. *to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites*
 - f. *that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective*
 - g. *for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies*
 - h. *to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*
 - i. *to reduce tensions between settled and traveller communities in plan-making and planning decisions*
 - j. *to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*
 - k. *for local planning authorities to have due regard to the protection of local amenity and local environment."*
5. Specifically, in relation to producing local plans, PPTS (paragraph 10) advises that local planning authorities (LPAs) should in producing their Local Plan:
- "a) *identify (and update annually) specific deliverable sites sufficient to provide 5 years' supply against locally set targets;*
 - b) *identify a supply of specific developable sites, or broad locations of growth, for years 6 to 10, and where possible, years 11 to 15;*
 - c) *consider production of joint development plans on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area;*
 - d) *relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density*
 - e) *protect local amenity and environment."*
6. PPTS also notes (at paragraph 11), that criteria should be set to guide land supply allocations where there is identified need. This TSSM applies such criteria in its sieving process.

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7. Paragraph 13 of PPTS stipulates that LPAs *“should ensure that traveller sites are sustainable economically, socially and environmentally and ensure that plan policies:*
- ”a) promote peaceful and integrated co-existence between the site and the local community;*
 - b) promote access to appropriate health services;*
 - c) ensure that children can attend school on a regular basis;*
 - d) reduce the need for long-distance travelling and possible environmental damage caused by unauthorised development;*
 - e) provide for proper consideration of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there;*
 - f) avoid placing undue pressure on local infrastructure and services;*
 - g) not locate sites in areas at high risk of flooding, including functional floodplains; and*
 - h) reflect the extent to which traditional lifestyles, (whereby some travellers live and work from the same location thereby omitting many travel to work journeys), can contribute to sustainability”*
8. When assessing the suitability of rural or semi-rural sites, paragraph 14 of PPTS notes that LPAs *“should ensure that the scale of sites in rural or semi-rural settings does not dominate the nearest settled community”*. In addition, paragraph 15 goes on to note that where - as is the case in Epping Forest District - there is a lack of affordable land to meet local traveller needs, LPAs in rural areas *“where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using a rural exception site policy for traveller sites.... A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities, that would not normally be used for traveller sites. Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities”*.
9. Paragraph 16 of the PPTS states that *“Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.”* Paragraph 17 states that *“...If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary ... to meet a specific, identified need for a traveller site, it should do so only through the plan making process ... If land*

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is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only”.

10. Paragraph 18 advises *“that local planning authorities should consider, wherever possible including traveller sites for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical”.*
11. Sites identified for traveller use should not be in locations that are considered to be inappropriate for ordinary residential dwellings. PPTS paragraph 25 states that *“LPAs should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure”.*

Assumptions

12. There is no official definition as to what constitutes a single traveller residential pitch. Travellers require various sizes of accommodation, depending on the numbers of caravans per pitch which varies with different families living at different densities. However, the caravan to pitch ratio is usually considered to be one mobile home and one touring caravan per pitch. Sites of various sizes, layouts and pitch numbers operate successfully and often work best when they take account of the size, needs and demographics of the families that are resident on-site. The convention used in this method statement is that a pitch is the place on a traveller site accommodating a single household and typically contains enough space for one or two caravans.¹ The site size will be used to guide the search for potential new sites based on a broad assumption that a traveller pitch has an average size of 0.1ha. Both the 2012 and current Government Guidance² are silent on site sizes; previous Government guidance³ stated that it was not appropriate to set a national maximum size for sites but suggested that cases should be considered in context and in relation to local infrastructure, population size and density. Having regard to these factors and the size of existing traveller sites in the District, it is considered that the maximum size of any site should be around 15 pitches with the size of a single pitch site 0.1ha – hence the initial search for sites across the District will range in size between 0.1ha and 1.5ha. Travelling Showpeople are likely to require a larger area, (often referred to as a “plot” or “yard”), as they are likely to need space for the storage of equipment. The Council will use the average yard size (0.13ha) of the existing Travelling Showpeople site within the District to identify future provision.

¹ Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association ORS July 2014 – page 40

² Planning policy for traveller sites DCLG March 2012 and Planning policy for traveller sites DCLG August 2015

³ ODPM Circular 01/2006 – Annex C paragraph 6

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13. The Council will continue with the approach of regularising pitches. The approach outlined in this method statement will be taken in respect of consideration of unauthorised caravans and pitches currently with temporary permission. In order to determine whether such an approach will be appropriate in planning policy terms, and in accordance with the requirements of paragraph 17 of the PPTS, sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation will be considered through the application of the stages set out in this TSSM.

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14. The TSSM seeks to take careful account of all the above factors, in accordance with national policy and guidance and, in particular the considerations outlined in the PPTS. The consideration of sites needs to ensure that they have all been assessed consistently and, given the identified need, criteria set to guide land supply allocations in accordance with the PPTS. A staged process is therefore proposed. It comprises a sieving approach whereby sites are identified and then sifted out at different stages of the process following more detailed scrutiny and assessment. In order to comply with the matters outlined in sections a) and b) of paragraph 10 in PPTS, the Council will assess sites against their suitability, availability and achievability. Further detail on each of the proposed stages is set out in the following sub-sections.

Suitability

Stage 1: Identifying Sites for Consideration

15. Selecting the right location for a traveller site is key to supporting good community relations and maximising its success. As with housing for the settled community, poorly located sites that lack easy access to major roads or public transport will have a detrimental effect on the ability of residents to access health services, shopping facilities, attend school or other education / training and seek or retain employment. Therefore, the Council must demonstrate by evidence that the search for traveller sites within the District is exhaustive and includes consideration of both public and privately-owned land.
16. The Council has identified the following potential sources of sites; in identifying these sources of sites the Council has had regard to paragraph 011 of the Planning Practice Guidance (Reference ID: 3-011-20140306):
- (a) Extant planning permissions or pitches/yards under construction;
 - (b) Planning applications that have been refused or withdrawn or are subject to pre-application discussions;

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- (c) Sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation;
 - (d) Intensification and/or extension of existing permanent authorised sites and sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation and also have the potential for intensification and/or expansion;
 - (e) Privately owned sites being promoted for traveller sites identified through the Council's Call for Sites;
 - (f) Council and other publicly owned land within the District;
 - (g) Potential sites identified and consulted on by the Council in 2008;⁴
 - (h) Other appropriate locations identified through desk-based analysis;
 - (i) Working with Registered Providers of social housing to develop and manage a site or sites for the travelling community; and
 - (j) If insufficient potential suitable traveller sites are promoted by developers / identified from the sources identified in (a) to (i) above an allocation within a strategic site allocation will be considered.
17. Further details on how sites falling within 16(d) and 16(h) will be identified is provided in the following sub-sections.

Stage 1a: Narrowing Broad Locations to Sites

18. In relation to sites to be identified through paragraph 16(h), the following approach will be undertaken to identify broad locations and then within these identify potentially suitable sites, which will be subject to further assessment.
19. The whole District will comprise the area of search. To identify broad locations, the following criteria will be applied:
- (a) Remove parts of the District which are not proximate to the public highway. This is to ensure that travellers can access services and facilities and to facilitate ease of movement of mobile homes/caravans onto any sites that may subsequently be chosen. Those areas of the District which are not within 100 metres of the edge of classified and other metalled roads will be discounted at this stage.
 - (b) Locating new traveller sites in immediate or very close proximity to existing developments in settlements is less likely to promote peaceful and integrated co-existence between the traveller and settled communities (PPTS, paragraph 13a) and to ensure that the location of sites respects the scale of and does not

⁴ Consultation on Options: Development Plan Provision for Gypsies and Travellers in Epping Forest District (2008/2009)

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dominate the nearest settled community (PPTS, paragraph 25). This takes account of feedback received from the local traveller community. Therefore, locations which are already developed and outside the Green Belt will be discounted from this search for suitable sites.

20. The remaining areas will comprise broad locations, which will be refined further by screening the locations against major policy constraints. These have been identified based on the requirements of PPTS, the NPPF, or local considerations and means that the use of the location for a traveller site would likely cause significant adverse economic, social and environment impacts.
21. Each broad location will be screened against the criteria set out below using Geographic Information Systems (GIS). If any part of the broad location is subject to one or more of the following major policy constraints that portion of land will be removed from further consideration:
 - (a) European protected sites: Special Protection Areas, Special Areas of Conservation, Ramsar sites;
 - (b) Nationally protected sites: Sites of Special Scientific Interest;
 - (c) Ancient Woodland;
 - (d) Local Nature Reserves;
 - (e) Registered Parks and Gardens;
 - (f) Scheduled Monuments;
 - (g) Flood Zone 3a and 3b;
 - (h) Locations within High Pressure Gas Pipeline Safeguarding Zones;
 - (i) Locations within 150m of a high voltage power line;
 - (j) Locations adjacent to, or at the ends of, airfield runways.
22. The justification for each of the major policy constraints identified in paragraph 21 is set out in Table 1 (below). Where applicable, the justification for the major policy constraints aligns with that justification provided for the major policy constraints identified at Stage 1 of the SSM (and has been re-provided in the table below for ease of reference and sake of completeness). Where the TSSM does not include the SSM major policy constraints at this stage, or additional major policy constraints have been identified beyond those set out in the SSM, justification for their inclusion in the TSSM is provided in Table 1.

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No.	Major policy constraint	Justification for major policy constraint
1	Remove land identified in locations in relatively isolated and remote rural parts of the District.	<p>The NPPF contains a presumption in favour of sustainable development (paragraph 14). The core planning principles identify as part of this that planning should “<i>take account of the different roles and character of different areas promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside...</i>” and “<i>actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable</i>”.</p> <p>The NPPF therefore indicates a preference for development to be located in areas which can access services and facilities. This is echoed in the PPTS (paragraph 4j), which advises on the need “<i>to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.</i>”</p> <p>Reflecting this, as part of the Green Belt Review Stage 1 (2015) the Council identified buffers for towns, large villages and small villages (as determined through the Settlement Hierarchy Topic Paper (2015)). The buffers identify the areas outside existing towns, large villages and small villages which could access key services and therefore might theoretically be suitable for development.⁵</p> <p>These buffers will be used at Stage 2 of the methodology to determine whether sites identified following Stage 1 comprise a sustainable location within the District.</p>
2	Remove land in locations which are fully within internationally designated sites of importance for biodiversity.	<p>Paragraph 109, bullet 3, of the NPPF confirms that the planning system should contribute to “<i>minimising impacts on biodiversity and providing net gains in biodiversity where possible...</i>”. Paragraph 110 goes on to confirm that “<i>Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.</i>”</p> <p>Circular 06/2005 provides further guidance on the Government’s statutory obligations in relation to internationally designated sites. Paragraph 55 states “<i>... If a proposal for a particular type of development on a particular location would be likely to adversely affect the integrity of a such a site, or the effects of the proposal on such a site are uncertain, planning authorities should not allocate the site for that type of development unless:</i></p>

⁵ Further detail on the methodology used to calculate the buffers is contained in the Green Belt Review - Stage 1 Report.

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No.	Major policy constraint	Justification for major policy constraint
		<p><i>a) they are satisfied that any subsequent or current planning application for that proposal would be likely to pass the tests for derogations in regulation 49; and</i></p> <p><i>b) there is a reasonable prospect that compensatory measures that may be required by regulation 53 can be secured such as to protect the coherence of the Natura 2000 network and meet the requirements of the Ramsar Convention where relevant.”</i></p> <p>It is considered that if land is wholly located within an internationally designated site that it is unlikely that development of that land would not affect the integrity of the European site and therefore on that basis land located within them will be removed from further consideration.</p>
3	Remove land in locations within nationally protected sites: Sites of Special Scientific Interest.	<p>The NPPF (paragraph 110) states that in preparing plans to meet development needs, the aim should be to minimise 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 the NPPF. Paragraph 4k of the PPTS states that local planning authorities should, in producing their Local Plan, protect local amenity and the local environment. For the purposes of the TSSM, it is considered that development directly within a Site of Special Scientific Interest would hinder the Council's ability to protect the local environment and therefore land located within Sites of Special Scientific Interest will be removed from further consideration.</p>
4	Remove land in locations within designated Ancient Woodland.	<p>The NPPF (paragraph 110) states that in preparing plans to meet development needs, the aim should be to minimise 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 the NPPF. Paragraph 4k of the PPTS states that local planning authorities should, in producing their Local Plan, protect local amenity and the local environment. For the purposes of the TSSM, it is considered that development directly within Ancient Woodland would hinder the Council's ability to protect the local environment and therefore land located within Ancient Woodland will be removed from further consideration.</p>
5	Epping Forest Buffer Land	<p>Epping Forest Buffer Land (which is intended to relieve pressure on the Forest from outdoor recreation and provide alternative habitat) is to be retained in perpetuity for the purpose of nature conservation. This land is therefore considered unsuitable for traveller accommodation. Since land will be removed from within settlement limits during an earlier part of Stage 1a it is unlikely that any potential locations will contain Epping Forest Buffer Land. Therefore,</p>

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No.	Major policy constraint	Justification for major policy constraint
		all sites which proceed to Stage 2 will be sifted against this constraint to check they are not wholly located within the Epping Forest Buffer Land and if they are they will be removed from further consideration.
6	Remove land in locations if fully within a Council owned or managed Local Nature Reserve.	Where Local Nature Reserves are owned and managed by the Council there is absolutely no intent to develop such sites; they are to remain in perpetuity for the purpose of nature conservation. At the time this stage of the TSSM was undertaken, the Council did not have access to data covering Essex County Council owned sites wildlife sites. Therefore all sites subject to Stage 2 of the TSSM will be sifted against this constraint and if they are wholly located within a County owned or managed wildlife site they will be removed from further consideration.
7	Remove land in locations within designated Registered Parks and Gardens	<p>The NPPF (paragraph 126) states that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment and <i>“in doing so recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”</i> This paragraph continues that LPAs should take into account <i>“the desirability of new development making a positive contribution to local character and distinctiveness.”</i></p> <p>PPTS (paragraph 4k) states that LPAs should in producing their Local Plan protect local amenity and environment. For the purposes of the TSSM, it is considered that development directly within designated Registered Parks and Gardens would hinder the Council’s ability to protect the local environment and therefore land located within designated Registered Parks and Gardens will be removed from further consideration.</p>
8	Remove land in locations within designated Ancient Monuments	<p>The NPPF (paragraph 126) states that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment and <i>“in doing so recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”</i> This paragraph continues that LPAs should take into account <i>“the desirability of new development making a positive contribution to local character and distinctiveness.”</i></p> <p>PPTS (paragraph 4k) states that LPAs should in producing their Local Plan protect local amenity and environment. For the purposes of the TSSM, it is considered that development directly on Scheduled Ancient Monuments would hinder the Council’s ability to protect the local environment and therefore land located on Scheduled</p>

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No.	Major policy constraint	Justification for major policy constraint
		Ancient Monuments will be removed from further consideration.
9	Remove land in locations entirely within Flood Risk Zone 3a and 3b.	<p>Paragraph 100 of the NPPF states that “<i>inappropriate development in areas of risk of flooding should be avoided by directing development away from areas of highest risk...</i>” and then sets out that the Sequential Test and if necessary the Exceptions Test should be applied. Table 3 (flood risk vulnerability and flood zone ‘compatibility’) in the PPG provides further guidance on flood zones including where development may be appropriate. It confirms that with the exception of essential infrastructure (where the Exception Test would need to be applied) and water compatible uses, other uses should not be permitted in Zone 3b [Reference ID: 7-067-20140306].</p> <p>The PPG also advises that “<i>only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 (areas with a high probability of river or sea flooding) be considered, taking into account the flood risk vulnerability of land uses.</i>” [Reference ID: 7-019-20140306].</p> <p>PPTS (paragraph 13g) states that LPAs should “<i>not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.</i>”</p> <p>Table 3 of the PPG indicates that ‘Highly Vulnerable’ development (including “Caravans, mobile homes and park homes intended for permanent residential use”) should not be permitted (Reference ID: 7-025-20140306) in Zone 3a.</p> <p>Therefore, it is not considered appropriate to allocate sites for traveller site provision on land which is within Flood Zones 3a and 3b.</p>
10	Remove land if located within high pressure gas pipeline safeguarding zones or 150m of a high voltage power line.	<p>Paragraph 172 states that planning policies should be based on up-to-date information on the location of major hazards. The Glossary to the NPPF defines major hazards as: “<i>installations and pipelines, licensed explosive sites and nuclear installations, around which Health and Safety Executive (and Office for Nuclear Regulation) consultation distances to mitigate the consequences to public safety of major accidents may apply.</i>”</p> <p>The SSM identifies the HSE’s Land Use Planning Methodology⁶ sets out a matrix for deciding whether development of a site should be advised against, or not. This is based on a site’s location within the Consultation Zones (Inner, Middle, Outer), and the Level of Sensitivity (1</p>

⁶ Health and Safety Executive Land Use Planning Methodology, [available online] <http://www.hse.gov.uk/landuseplanning/methodology.pdf>

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No.	Major policy constraint	Justification for major policy constraint
		<p>to 4) based on the use of the site. Development within the Inner Zone is only permissible for Level 1 uses, which does not include traveller uses. This more detailed data was not available to use at the time that the Stage 1 of the TSSM was undertaken. Therefore, for the site selection of traveller sites for this TSSM land was removed if it fell within identified high pressure gas safeguarding zones or 150m of a high voltage power line.</p> <p>At Stage 2 of the TSSM sites will be considered against the more recent Health and Safety Executive Consultation Zones Inner Zone and sites located fully within it removed from the sift.</p>
11	Remove land in locations adjacent to or at the end of airfield runways	<p>The NPPF stipulates that “<i>Local Plans should identify land where development would be inappropriate</i>” (paragraph 157); and that “<i>planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life</i>” (paragraph 123). Specifically in relation to travellers, PPTS (paragraph 13e) states that proper consideration be given to “<i>the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development.</i>” Given the noise generated from aircraft it is considered appropriate to remove land subject to highest levels of noise exposure.</p>

Table 1: Major policy constraints

23. At the end of this process, a series of broad locations which may be potentially suitable for traveller sites will have been identified.
24. Further assessment will then be undertaken to identify potentially suitable sites within the broad locations. This will involve desktop analysis and mapping applying existing field boundaries to ensure that potential sites identified have some existing physical boundaries on the ground. In seeking to identify sites of between 0.1ha and 1.5ha in size, remaining areas of land that are either greater than 1.5 hectares or less than 0.1 of a hectare will be removed. In accordance with the advice given in the Government’s Planning Practice Guidance⁷ when identifying individual site boundaries account will be taken of:
- (a) likely compatibility with neighbouring uses;
 - (b) the practicality of the size and shape of the site to accommodate at least one pitch; and

⁷ Paragraph 012, Reference ID: 3-012-20140306

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- (c) the ability to identify clearly defined boundary/perimeter to the site and where possible to use existing natural features.
25. In respect of the consideration of likely compatibility with neighbouring uses access to services and facilities is important and therefore in ensuring sustainable locations are chosen the provision of additional traveller pitches should avoid locations that are too remote from settlements (in accordance with paragraph 13b and 13c of the PPTS). However, it is acknowledged from responses the Council received to potential traveller sites and location consultations undertaken in 2008 and 2012 that locating sites too near existing settlements is likely to be unpopular with both the traveller and the settled communities and therefore reduces the prospects for promoting the peaceful and integrated co-existence that paragraph 13a of the PPTS advises local planning authorities should seek. On this basis, sites considered to result in incompatibility with neighbouring uses will be removed from the sift.
 26. With regard to the size and shape of potential sites, areas which are below 0.1ha will be rejected together with sites with an area larger than 0.1ha but where the shape and configuration of the site renders it impractical to accommodate a single pitch.
 27. In relation to boundaries, areas with the potential to accommodate sites will be rejected where there are no existing clearly defined natural or man-made feature that might be used to demarcate a site boundary.
 28. Each potentially suitable site will be given a unique reference number and the following information will be recorded:
 - (a) site address /description of the location;
 - (b) Parish;
 - (c) site area in hectares; and
 - (d) the extent to which the site has identified physical boundaries.
 29. **OUTPUT for STAGE 1a:** List of sites and map which identify sites which will be subject to more detailed suitability assessment.

Stage 1b: Intensification and/or extension of existing sites

30. More intensive use of, or extensions to, existing permanent authorised sites or sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation and also have the potential for intensification and/or expansion will be explored. This is considered appropriate given that: (i) over half of the need projected in the Council's Gypsy and Traveller Accommodation Assessment comes from household formation; and (ii) most of the District's travelling community is made up of small discrete family units. It is a recognition that a significant portion of future demand is more likely to come from the already established travelling community.

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31. There is no single ideal size of site or number of pitches although experience of EFDC officers, site managers and residents alike suggest that a maximum of 15 pitches in capacity is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of 3-4 pitches can also be successful, particularly where designed for one extended family. Larger site sizes are not recommended unless there is clear evidence to suggest that a larger site is preferred by the traveller community.⁸
32. In considering the scope to intensify the density of pitches on an existing site it will be essential to ensure that an appropriately sized clear gap is maintained as a fire prevention measure. Working within existing site boundaries, favourable consideration to intensifying existing pitch densities is more likely on sites that currently include poorly defined communal areas that lack a clear usage.
33. To identify sites a review will be undertaken of existing sites to understand where there may be scope for intensification and/or adjacent land suitable for extension. In such cases the total number of pitches proposed on the site will not exceed 15 pitches.
34. **OUTPUT for STAGE 1b:** Defined areas within or adjacent to existing traveller sites or unauthorised sites or sites with temporary permission which may be suitable for regularisation and which are at least 0.1ha and may be potentially suitable as additional traveller pitches.

Stage 2: Site availability

35. At the end of Stage 1, the Council will have a list of sites that may be potentially suitable for traveller accommodation identified from the sources listed in paragraph 16(b) to 16(i). Given limitations in the Council's resourcing, the identification of sites through these sources will be undertaken in two Tranches. Tranche 1 will comprise those sites identified through the Council's Call for Sites (paragraph 16(e)) and other appropriate locations (paragraph 16(h)) with Tranche 2 comprising any sites from the sources identified at sub-paragraphs 16(b) to 16(d), 16(f), 16(g) and 16(i).
36. The application of the TSSM commenced in May 2016 for Tranche 1 sites. In August 2016, following the identification of Tranche 2 sites, the Council reviewed the draft TSSM. It concluded that an additional stage should be added to the TSSM, which involved collecting information on whether a landowner would be willing for a site to be considered for traveller accommodation. This difference in approach to the SSM is considered appropriate since it will: enable the traveller community to participate more fully in the identification of sites; and provides a more proportionate approach to assessing sites by ensuring they are not assessed unless there is a realistic prospect of them coming forward. For other residential and employment sites the Council already holds information on likely availability of sites through the preparation of the Strategic Land Availability Assessment; this additional step is therefore not considered necessary.

⁸ Designing Gypsy and Traveller Sites DCLG May 2008 – paras 4.7 and 4.8

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37. At the point at which the decision was made to add this stage into the TSSM the Tranche 1 sites have been subject to Stages 3 and 4 of the TSSM. Therefore, some of the Tranche 1 sites had already been discounted from the site selection process. Landowners will therefore only be contacted for Tranche 1 sites where the sites have not yet been discounted from the site selection process. For Tranche 2 sites, all sites identified will be subject to Stage 2.
38. Where landowners have not directly promoted their sites for consideration for traveller accommodation letters will be sent (based on searches of the Land Registry) seeking to elicit their interest in either selling or leasing land for this purpose. If a negative response is received from a landowner in response to such an approach, then this will be documented and the site will not progress further through the site selection process.
39. **OUTPUT for STAGE 2:** Confirmation for each site as to whether it should proceed to Stage 3 (provided as a list and in map format).

Stage 3: Major policy constraints

40. The purpose of Stage 3 is to consider all sites from the sources identified in paragraph 16(b) to 16(i) (above) consistently and to align the traveller site search with that being undertaken for residential and employment sites. Therefore, all sites will be assessed against the major policy constraints identified in Table 1 (above) so that any sites which would likely cause significant social, environmental or economic harm in accordance with paragraph 152 of the NPPF, or would not be economically, socially or environmentally sustainable in accordance with paragraph 13 of PPTS be removed.
41. Each site will be screened against the criteria set out in Table 1 using a GIS database. The scoring will comprise a 'yes' or 'no' score against the criteria indicating whether a site should be removed from the sift. If a site scores 'yes' on one or more criteria it will be removed from the sift and will not be taken forward to Stage 4. Sites which score 'no' for all criteria will be taken forward to Stage 4.
42. **OUTPUT for STAGE 3:** Confirmation for each site as to whether it should proceed to Stage 4 (provided as a list and in map format).

Stage 4: Quantitative and qualitative assessment

43. The purpose of Stage 4 will be to undertake more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for traveller development. The assessment criteria are included at Appendix A, which applies a 'Red-Amber-Green' (RAG) rating system utilising a scale of three to five scores) and are the same criteria as those to be used at Stage 2 of the SSM except where identified in Appendix A.
44. The criteria are grouped into the following categories:
 - Impact on environmental and heritage designations and biodiversity;

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- Value to Green Belt;
 - Accessibility by public transport and to services;
 - Efficient use of land;
 - Landscape and townscape impact;
 - Physical site constraints and site conditions.
45. The quantitative criteria will primarily be scored against GIS information drawn from the GIS database. Where qualitative criteria are utilised a narrative on the planning judgements will be provided including the need for any mitigation measures. To ensure consistency in assessment across the candidate sites, Quality Assurance (QA) processes will be incorporated into the Stage 4 assessment process.

Moderation Workshop

46. During the Stage 4 assessment, a workshop will be held with attendees invited from Council officers, Highways England, Environment Agency and Natural England to moderate the results, check that there is a level of agreement on judgements and regularise any apparently significant inconsistencies. Following the moderation workshop the site assessments will be updated. This workshop will consider sites subject to the SSM and Tranche 1 sites subject to the TSSM together. A separate workshop will be held for Tranche 2 traveller sites.
47. **OUTPUT for STAGE 4:** Assessment Proforma for each site considered at Stage 4.

Stage 5: Identify candidate Preferred Traveller Sites

48. The purpose of Stage 5 is to identify the candidate Preferred Traveller Sites which best meet the Council's preferred approach to meeting traveller accommodation needs. The Council's aspiration was for this to be undertaken in parallel for employment, residential and traveller sites and bring together the assessment under this TSSM and the SSM. Given the delayed timescale for Tranche 2 traveller sites a separate workshop will be held for where traveller sites are considered.
49. In identifying the candidate Preferred Traveller Sites consideration will be given to identifying reasonable alternatives to the location of traveller sites in the District. For the purposes of traveller sites it is considered that a different approach should be adopted to identify reasonable alternatives to the 'best' fit approach adopted in the SSM. Paragraph 13 of the PPTS defines sustainable development in relation to traveller sites; reasonable alternatives will therefore be identified on the basis of this definition having regard to the need to identify realistic alternatives which will support the Council identifying a five-year land supply (in accordance with paragraph 10(a) of the PPTS). Given that there are likely to be fewer options for accommodating traveller sites in the District in comparison to other types of residential development the reasonable alternatives will not consider 'best' fit for each settlement but will instead

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consider strategically the different alternatives to locating traveller sites in the District such as traveller sites being distributed across the District or being clustered in locations within existing traveller sites. On the basis of the preferred alternative, the 'best' fit sites will then be identified.

50. In general, applying the RAG rating system in Appendix A, those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable for allocation. However, in common with all site selection/allocation processes, the identification of candidate Preferred Traveller Sites will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the specific criteria for identifying traveller sites outlined in PPTS and the characteristics of the sites being assessed under the TSSM. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.
51. To guide the identification of the most suitable candidate preferred Traveller Sites, a sequential approach to site selection will be applied, in accordance with the following:
- The sequential flood risk assessment – proposing land in Flood Zone 2 where need cannot be met in Flood Zone 1.
 - Sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation;
 - Intensification of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission);
 - Extension of existing traveller sites/sites which could be regularised (unauthorised sites or sites with temporary permission);
 - New Traveller sites in non-Green Belt areas;
 - New Traveller sites in Green Belt areas;
 - Where sufficient provision to meet identified need for additional pitches cannot be found from the above sources, to consider provision for allocating traveller pitches within strategic housing site allocations. (See para 48 below).
52. A workshop (as explained in paragraph 48 above) will be held with the Local Plan Working Group to identify candidate Preferred Sites, including those identified for traveller accommodation. Where a site has been proposed which exceeds 1.5ha officers will identify the preferred location of any additional pitches. Where consideration is being given to both regularising / permanent authorisation of an existing site in addition to intensifying use and / or extending the site boundary, these matters will be considered sequentially. Consideration will initially be given to regularising / permanent authorisation; if this is satisfied then intensification will be considered and finally extension of the existing site where the scope has been identified. In addition to using the hierarchy outlined below and planning judgement other qualitative factors will be considered including relevant consultation responses

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received to the Issues and Options Consultation, previous feedback from Councillors and initial officer evaluation of sites.

53. If, having followed the sequential approach outlined above, there remains a shortage of sites consideration will be given to the feasibility and scope for providing a traveller site in a strategic site.
54. Through the workshop the rationale for release of Green Belt and demonstrating exceptional circumstances will be discussed. Should this review of sites not result in sufficient suitable sites being identified the need to re-visit Green Belt Stage 2 sites of greater value to the Green Belt will also be agreed along with whether broad locations should be identified to deliver planned development in the latter stages of the plan period.

Workshop with Members

55. The Council's aspiration was once the candidate preferred sites had been identified Members would take part in a workshop to discuss the emerging findings. The purpose of the workshop will be to brief Members on the work completed and to check for factual inaccuracies in the technical assessment. It will also provide an opportunity for Members to 'check and challenge' the initial conclusions reached by officers. The delayed timescale for consideration of the traveller sites meant that the 'check and challenge' of traveller sites will occur through the Council's Regulation 18 consultation in Autumn 2016.
56. **OUTPUT for STAGE 5:** List and associated mapping of candidate Preferred Sites that will be taken forward for more detailed deliverability assessment.

Stage 6: Deliverability

57. The purpose of Stage 6 is to consider the deliverability of the candidate Preferred Traveller Sites to inform the identified need for traveller accommodation. Stages 1, and 3 to 5 will have already considered the suitability of the site. Therefore, the focus of this stage is whether a site is deliverable and specifically:
 - To better understand site availability including whether the site is available now, or is it likely to become available during the Local Plan period?
 - Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?

Availability

58. Where a positive response was received from landowners in response to the Council's request to sell or lease the land for traveller accommodation (see paragraph 38) additional information on availability will be sought from landowners. Where appropriate this will refine and augment information received through the Council's Strategic Land Availability Assessment and information held on any previously

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withdrawn or refused applications or pre-applications that included provision for traveller accommodation.

59. The availability assessment will predominantly focus on landownership, whether are existing uses on site, which would need to be relocated and when the site will be brought forward for development within the plan period.

Achievability

60. The assessment of achievability of candidate Preferred Traveller Sites will focus on the following elements:
- Viability and marketability of the sites.
 - Confirmation that there are no insurmountable constraints to a site. Primarily, this will be drawn from the Stages 1 and 3 to 5 assessments but will also include consideration of infrastructure requirements/constraints including inputs from statutory undertakers and infrastructure providers as identified through the preparation of the Infrastructure Delivery Plan.
61. A further 'check and challenge' of candidate Preferred Traveller Sites by Members will occur through the Council's Regulation 18 consultation in Autumn 2016.

Traveller site provision trajectory

62. Taking into account all information submitted under the previous headings, a judgement will be made on the likely timescales for the development proceeding. Sites that are deemed to be available and suitable, which are not subject to any constraints, will be considered as potential allocations within the first five years. For those sites that are considered suitable but have constraints, an assessment will be made to determine whether or not the site falls within five years, 6 to 10 years or 11 to 15 years, depending upon the nature of the constraint. Some constraints are likely to take longer than five years to overcome and in these cases the site will be considered as a potential allocation in the 6 to 10-year and 11 to 15-year categories.
63. Site owners who respond positively to the expression of interest letters sent will be asked to indicate the assumed timescale for development of the site but a final decision on how to allocate the site will be based on professional judgement, taking into account the wider range of factors considered. As part of this stage the exceptional circumstances for traveller sites located within the Green Belt will be re-confirmed and a decision taken regarding the need for identifying Safeguarded Land for potential release from the Green Belt, beyond the end of the Local Plan period, including the appropriate duration of any period of safeguarding.
64. Once a decision has been reached on the proposed site allocations the Council will seek to reach written agreement with those individuals/parties promoting the proposed site allocations. Such documents will form part of the Council's evidence base and will be used to support the proposed site allocations. It is envisaged that documenting and

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reaching written agreement with site promoters will be an on-going process which may commence during Stage 6 but will continue in parallel with Stages 7 and 8.

65. **OUTPUT for STAGE 6:** Portfolio of proposed traveller site allocations for the Draft Local Plan consultation. Confirmation of traveller pitch provision trajectory.

Stage 7: Sustainability Appraisal/Habitats Regulation Assessment (HRA) of candidate Preferred Traveller Sites

66. The Sustainability Appraisal assessment, undertaken by AECOM, will establish the impact of the candidate Preferred Traveller Sites alone and in combination. AECOM will also undertake an HRA of the candidate Preferred Traveller Sites as well as any more detailed assessment required for individual sites (as identified at Stage 4).

Stage 8: Review of candidate Preferred Traveller Sites following Draft Local Plan Consultation

67. The TSSM published at Appendix D of the Report on Site Selection (September 2016) confirmed that for Stage 8: *“The approach set out above is predicated on the assumption that further information on site suitability will be received in response to the Draft Local Plan consultation. Therefore, the assessment made in advance of the Draft Local Plan consultation will be based on the available information. It is not unusual for site proposals to change through the process of plan making as sites fall away when consulted upon and others are put forward.”*
68. *Following the Draft Local Plan consultation, the candidate Preferred Traveller Sites will be reviewed against any consultation responses and updated technical information, which is likely to include:*
- *Findings from the Stage 2 Economic Viability Study.*
 - *Detailed assessment of transport impacts.*
 - *Updated information on infrastructure requirements/constraints.*
 - *Level 2 SFRA.*
69. *Where there are clear planning reasons for altering the assessment (e.g. a change in planning circumstances, late identification of an error or new information arising from updated technical information), candidate Preferred Traveller Sites may be discounted and new sites identified for allocation in the Local Plan.”*
70. To provide clarity on which sites will be assessed and how they will be assessed, the text for Stage 8 has been supplemented to confirm the process that will be followed by the Council as it develops its Regulation 19 Pre-submission Local Plan.

Stage 8.1: Identifying Sites for Consideration

71. For those sites subject to the traveller site selection process prior to the Draft Local Plan consultation (comprising Tranche 1 and 2 sites), the starting point for their identification was the site sources identified in paragraph 16 (above). The sources of information for identifying additional sites to be subject to the TSSM post-Draft Local

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Plan consultation (referred to hereafter at Tranche 3 sites) comprises a sub-set of the sites sources identified in paragraph 16. In order to identify Tranche 3 sites the following sources will be used:

- Refused and withdrawn planning applications, live planning applications and pre-application enquiries received between 1 April 2016 and 31 March 2017;
- Call for Sites submissions received between 18 May 2016 and 31 March 2017;
- Additional sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation;
- Intensification and/or extension of the additional sites identified with temporary permissions or unauthorised sites that may potentially be suitable for regularisation and also have the potential for intensification and/or expansion in accordance with the requirements set out in Stage 1b above; and
- Representations from site promoters received in response to the Draft Local Plan consultation which identify new sites and/or proposals for Tranche 1 & 2 sites which are materially different from that previously assessed.

72. Before sites are assessed through the TSSM they will be reviewed to check they accord with the approach set out in paragraph 12.

73. Tranche 3 sites will be subject to site availability assessment (Stage 2 above) as part of the deliverability assessment (Stage 8.6) to enable all stages of the TSSM and SSM to run in parallel.

Stage 8.3: Major policy constraints

74. The purpose of this stage is to identify any sites that are subject to major policy constraints identified in the NPPF, or by reference to local considerations, such that development of the candidate site would likely cause significant social, environmental or economic harm in accordance with paragraph 152 of the NPPF.

75. Tranche 1 and 2 sites were subject to the following major policy constraints:

- Remove sites where no part of the site is located within the settlement buffer zones;
- Remove sites entirely within Flood Risk Zones 3a and 3b;⁹
- Remove sites which are fully within internationally designated sites of importance for biodiversity;
- Remove sites which are fully within a County owned or managed wildlife site or Council owned or managed Local Nature Reserve;

⁹ It should be noted that for major policy constraint 2 'Remove sites entirely within Flood Risk Zone 3b', for traveller sites only this will be extended to be 'Remove sites entirely within Flood Risk Zone 3a and 3b' to reflect the guidance set out in the Planning Practice Guidance, which seeks to restrict vulnerable uses such as caravans within Flood Risk Zone 3a.

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- Remove sites which are fully in City of London Corporation Epping Forest and its Buffer Land; and
 - Remove sites which are fully located within the Health and Safety Executive Consultation Zones Inner Zone.
76. It is considered that sites located outside of the settlement buffer zone should not be excluded at this stage of the TSSM. Therefore, this stage will be undertaken for Tranche 3 sites and any Tranche 1 & 2 sites which were filtered out at Stage 3 due to being entirely located outside of the settlement buffer zones. Other Tranche 1 & 2 sites will not be re-assessed as the other major policy constraints and the data supporting each constraint remains unchanged from that used in 2016.
77. Each site will be screened against the criteria set out in bullets 2 to 6 above using a GIS database. The site boundary for each site will be taken from the relevant information source identified in paragraph 71 (above). As for Tranche 1 & 2 sites, the scoring will comprise a 'yes' or 'no' score against the criteria indicating whether a site should be removed from the sift. If a site scores 'yes' on one or more criteria it will be removed from the sift and will not be taken forward to Stage 8.4. Sites which score 'no' for all criteria will be taken forward to Stage 8.4.
78. **OUTPUT for STAGE 8.3:** Confirmation for each Tranche 3 site and Tranche 1 & 2 site which was previously sifted out due to being located outside the settlement buffer zones as to whether it should proceed to Stage 8.4 (provided as a list and in map format).

Stage 8.4: Quantitative and qualitative assessment

79. The purpose of this stage is to undertake more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for traveller development. The assessment criteria are included at Appendix A, which applies a RAG rating system utilising a scale of three to five scores.
80. This stage will only be undertaken for Tranche 3 sites, and Tranche 1 & 2 sites which were previously not assessed at Stage 4 because they were located outside the settlement buffer zones. Other Tranche 1 & 2 sites will not be re-assessed as criteria and the data supporting each criterion remains unchanged from that used in 2016.
81. Site assessments for Tranche 1 & 2 sites will be reviewed against the comments raised in site promoter's representations to the Draft Local Plan consultation. A table will be included in the Report on Site Selection which identifies those sites for which representations from site promoters were made and where a change has been made in response to the representation.
82. To ensure consistency in assessment across the candidate sites and between the three Tranches of sites, QA processes will be incorporated into the Stage 8.4 assessment process. This will include moderation of the assessment by Council officers (as part of the Stage 8.5 workshops), which will include checking that there is

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a level of agreement on judgements and regularise any apparently significant inconsistencies.

83. **OUTPUT for STAGE 8.4:** Assessment Proforma for each Tranche 3 site and Tranche 1 & 2 site which was previously sifted out due to being located outside the settlement buffer zones considered at Stage 8.4.

Stage 8.5: Identify candidate Preferred Traveller Sites

84. The purpose of this stage is to identify the candidate Preferred Traveller Sites, which best meet the Council's preferred approach to meeting traveller accommodation needs. This stage will consider Tranche 1 & 2¹⁰ and Tranche 3 sites assessed at Stage 8.4 and will be undertaken in parallel with employment and residential sites assessed under the SSM.
85. The process will be consistent with that described in paragraphs 49 and 50 (above). For Tranche 1 & 2 sites, consideration will also be given to representations from site promoters received in response to the Draft Local Plan and a decision made on whether it affects the conclusions previously drawn.
86. To inform which sites are taken forward for further testing (at Stage 8.6), the hierarchy set out in paragraph 51 and considerations set out in paragraphs 52 and 53 will be followed. The following additional factors will also be taken into account and where appropriate may result in additional sites being taken for further testing including:
- The outcomes of the transport, infrastructure and HRA modelling of the Draft Local Plan sites should this indicate constraints to delivering growth in particular settlement(s).
 - The Council's latest pitch trajectory should this indicate that a particular size or type of site may be required in order for the Council to demonstrate a five-year land supply.
 - Refined settlement visions and work on placemaking taking account of consultation comments and further evidence based work.
 - Progress with emerging and made Neighbourhood Plans which include site allocations.
87. A workshop will be held with the Local Plan Officer Working Group to identify candidate Preferred Sites. This will include consideration of whether sites should comprise traveller accommodation and other uses in order to meet the District's residential including traveller and employment needs.

¹⁰ Unless a Tranche 1 & 2 site has been re-assessed as part of Tranche 3 or has site has been withdrawn for consideration through the site selection process. Where a Tranche 1 & 2 site has been re-assessed as part of Tranche 3, the site proposal assessed through Tranche 3 will be subject to Stage 8.5.

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88. **OUTPUT for STAGE 8.5:** List and associated mapping of candidate Preferred Traveller Sites that will be taken forward for more detailed deliverability assessment.

Stage 8.6: Deliverability

89. The purpose of this stage is to consider the deliverability of the candidate Preferred Sites to inform the housing trajectory for the Plan. Stages 8.3 to 8.5 considered the suitability of the site and, therefore, this stage will focus on whether a site is deliverable, specifically:
- Whether the site is available now, or is it likely to become available during the Local Plan period?
 - Whether there is a reasonable prospect that development will be achievable within the appropriate timescales?
90. Information collected from promoters Call for Sites forms will be supplemented by updated information from promoters/developers/landowners and further technical studies. As a minimum, a Proforma will be sent to all Tranche 3 site promoters/developers/landowners (as appropriate¹¹), which proceed to Stage 8.4 to validate the information provided in the Call for Sites form and to seek further, more detailed information on proposals. This exercise will commence during Stage 8.4 to provide sufficient time for promoters/developers/landowners to respond.
91. More detailed discussions may be held with promoters/developers/landowners through the Developer Forum.

Availability and achievability assessment

92. The availability and achievability assessment criteria are included at Appendix B, which applies a RAG rating system utilising a scale of three scores. For Tranche 3 sites the availability and achievability assessment will draw on the information collected through the Call for Sites form, promoter/developer/landowner Proforma and other technical studies.
93. For Tranche 1 & 2 sites, the availability and achievability assessment will be updated where relevant comments are received from site promoters through their representations to the Draft Local Plan; where the Council has received updated information through the Developer Forum or other mechanisms; and where updated or new technical studies are available.
94. To ensure consistency in assessment across the candidate sites, QA processes will be incorporated into the Stage 8.6 assessment process. This will include moderation of the assessment by Council officers, which will include checking that there is a level of agreement on judgements and regularise any apparently significant inconsistencies.

¹¹ Site promoters/developers/landowners of Tranche 1 & 2 site previously sifted out due to being located outside the settlement buffer zones but which now proceed to Stage 8.4 will also be sent a Proforma.

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Identifying sites for allocation

95. This element of Stage 8.6 will consider all Tranche 1, 2 and 3 sites and will be undertaken in parallel for residential including traveller and employment sites. A workshop will be held with officers to identify sites for allocation. In identifying sites for allocation the following considerations will be taken into account:
- The findings of the availability and achievability assessment including the likely timescale for sites coming forward in accordance with those matters identified in paragraphs 62 and 63.
 - The Council's existing pitch trajectory including five-year land supply and the scale of the residual land demand.
 - Those sites in each settlement which are considered most appropriate to achieve settlement visions.
 - The findings of any transport, infrastructure or HRA sensitivity testing.
 - Need arising from specific households and the extent to which such needs can be met on sites currently occupied by the household.
96. Following the workshop with the Local Plan Officer Working Group, a cumulative achievability assessment of the residential including traveller sites identified for allocation will be undertaken. The criteria for the cumulative achievability assessment are set out in Appendix B.
97. Upon completion of the cumulative achievability assessment, a workshop will be held with Members. The purpose of the workshop will be to brief Members on the further work undertaken for Stages 8.1 to 8.6 and provide an opportunity for Members to 'check and challenge' the conclusions reached by officers. Following the workshop, the feedback received will be reviewed and an assessment made as to whether there are clear planning reasons for amending the selection of sites for allocation.
98. Following the completion of the achievability assessment, consideration would be given as to whether there are any insurmountable constraints, which would preclude the site from allocation.
99. **OUTPUT for STAGE 8.6:** Portfolio of proposed traveller site allocations. Confirmation of the traveller pitch provision trajectory.

Site selection work – Post completion work

100. Following conclusions of the site selection process, the Council will undertake further work to inform the Local Plan including:
- SA and HRA, which will include, as necessary, assessment of the Tranche 3 sites in accordance with the relevant regulations;
 - Infrastructure Delivery Plan; and

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- Transport modelling.

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Appendix A Stages 4 and 8.4 Criteria

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.1	Impact on Internationally Protected Sites	Housing, Traveller and Employment (B class uses)		Site is necessary for the management of internationally protected sites	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or in combination with other sites)	Effects of allocating the site for the proposed use are not likely to be significant alone but should be checked for in-combination effects	Effects of allocating the site for the proposed use is likely to have a significant effect

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.2	Impact on Nationally Protected sites	Housing, Traveller and Employment (B class uses)			Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	Site falls within an Impact Risk Zone and due to the nature and scale of the development proposed it is likely to be possible to mitigate the effects of the proposed development.	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is unlikely to be possible to mitigate the effects of the proposed development.
1.3a	Impact on Ancient Woodland	Housing, Traveller and Employment (B class uses)			Site is not located within or adjacent to Ancient Woodland.	Site is adjacent to or contains Ancient Woodland but possible effects can be mitigated.	Site is adjacent to or contains Ancient Woodland. The proposals would likely result in direct loss or harm to Ancient Woodland or cannot be mitigated.

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.3b	Impact on Ancient and Veteran Trees outside of Ancient Woodland	Housing, Traveller and Employment (B class uses)			No Ancient or Veteran trees are located within the site.	Site contains Ancient and/or Veteran trees but at a sufficiently low density across the site that removal could be largely avoided or possible impacts could be mitigated.	Site contains a higher density of Ancient and/or Veteran trees, or are configured in such a way that direct loss or harm is likely.
1.4	Impact on Epping Forest Buffer Land	Housing, Traveller and Employment (B class uses)		Site may assist in extending the Epping Forest Buffer Lands	Site is unlikely to impact on Epping Forest Buffer Lands	The effects of the site on Epping Forest Buffer Lands can be mitigated.	Site is likely to result in harm to Epping Forest Buffer Lands which cannot be mitigated.
1.5	Impact on BAP priority species or Habitats	Housing, Traveller and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of BAP priority habitats from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.6	Impact on Local Wildlife Sites	Housing, Traveller and Employment (B class uses)		Features and species in the site are retained and there are opportunities to enhance existing features.	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	Features and species in the site may not be retained in their entirety but effects can be mitigated.	Features and species in the site unlikely to be retained and effects cannot be mitigated.
1.7ai	Flood Risk	Housing	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required		Site within Flood Zone 3a where exception test required	Site within Flood Zone 3b and not likely to be suitable for development
1.7aii	Flood Risk	Traveller	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required			Site within Flood Zone 3a or Flood Zone 3b and not likely to be suitable for development
1.7b	Flood Risk	Employment (B class uses)	Site within Flood Zone 1	Site within Flood Zone 2 and exception test not required	Site within Flood Zone 3a and exception test not likely to be required		Site within Flood Zone 3b and not likely to be suitable for development

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.8a	Impact on Scheduled Ancient Monument / Listed Building / Conservation Area/ Historic Park or Garden	Housing, Traveller and Employment (B class uses)	Opportunity for the site to enhance the significance of the heritage asset / further reveal its significance / enhance the setting.	Site is not likely to affect heritage assets due to their distance from the site.	Site is located within the setting of an heritage asset and effects can be mitigated.	Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.	Site would likely result in the loss of a heritage asset or result in a significant impact that cannot be mitigated.
1.8b	Impact on Archaeology	Housing, Traveller and Employment (B class uses)		There is a low likelihood that further archaeological assets would be discovered on the site	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site	

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
1.9	Impact of Air Quality	Housing, Traveller and Employment (B class uses)			Site lies outside of areas identified as being at risk of poor air quality.	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.	Site lies within an area which has been identified as being at risk of poor air quality, and it is unlikely that the risk could be mitigated.

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
2.1	Level of harm to Green Belt ¹²	Housing, Traveller and Employment (B class uses)	Site provides opportunities to assist in the active use of Green Belt without any loss.	Site is not located in the Green Belt.	Site is within Green Belt, but the level of harm caused by release of the land for development would be none ¹³ .	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high.

¹² Paragraph 80 of the NPPF sets out the five purposes of Green Belt. In undertaking its Stage 2 Green Belt Review the Council has considered the extent to which these criteria apply to the District and the areas designated as Green Belt. For the Stage 2 Green Belt Assessment a decision was made that individual Green Belt parcels should not be assessed against purpose 5 (to assist in urban regeneration) as it was not possible to distinguish the extent to which individual Green Belt parcels deliver against this purpose and therefore could not be applied in the context of the District which is predominantly rural in character and with limited derelict or other urban land in need of recycling. The Council has also considered how to treat purpose 3 in its Stage 2 Green Belt Assessment, which relates to safeguarding the countryside from encroachment. Given the rural nature of the District the majority of the District's Green Belt performs strongly against this purpose. Therefore, the Council has undertaken some sensitivity testing in its Stage 2 Green Belt Review to look at how Green Belt performs if purpose 3 is removed from the assessment (and therefore parcels are assessed against purposes 1, 2 and 4). The results of this assessment provide a more nuanced picture of how Green Belt performs across the District. As acknowledged in preceding sections of the SSM, if the Council is to meet its objectively assessed housing and employment needs the case for Green Belt release will need to be considered. It is the Council's view that using the Green Belt assessment which considers the 3 purposes (rather than 4) will provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. It is on this basis that the Council proposes to use the results of the sensitivity testing for site selection. Further justification for adopting this approach is contained in the Stage 2 Green Belt Assessment.

¹³ It is noted that all releases of designated Green Belt land will result, at least to some extent, in harm due to the loss of land from the Green Belt. This phrasing reflects that based on the draft Stage 2 Green Belt Assessment that some parcels of the District's existing Green Belt do not meet the purposes as set out in paragraph 80 of the NPPF.

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Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.1	Distance to the nearest rail/tube station	Housing, Traveller and Employment (B class uses)		Site is less than 1000m from the nearest rail or tube station	Site is between 1000m and 4000m from the nearest rail or tube station	Site is more than 4000m from the nearest rail or tube station	
3.2	Walking distance to nearest bus stop (with at least peak hourly day service)	Housing, Traveller and Employment (B class uses)		Site is within 400m of a bus stop.	Site between 400m and 1000m of a bus stop.	Site more than a 1000m from a bus stop.	
3.3	Access to employment	Housing, Traveller		Site is within 1600m of an employment site/location.	Site is more than 1600m and less than 2400m of an employment site/location.	Site is more than 2400m from an employment site/location.	
3.4	Distance to local amenities	Housing, Traveller and Employment (B class uses)		Site is less than 1000m from nearest town, large village or small village.	Site is between 1000m and 4000m from nearest town, large village or small village.	Site is more than 4000m from the nearest town, large village or small village.	

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
3.5	Distance to nearest infant/primary school	Housing, Traveller		Site is less than 1000m from the nearest infant/primary school	Site is between 1000m and 4000m from the nearest infant/primary school	Site is more than 4000m from the nearest infant/primary school	
3.6	Distance to nearest secondary school	Housing, Traveller		Site is less than 1000m from the nearest secondary school	Site is between 1000m and 4000m from the nearest secondary school	Site is more than 4000m from the nearest secondary school	
3.7	Distance to nearest GP surgery	Housing, Traveller		Site is less than 1000m from the nearest GP surgery	Site is between 1000m and 4000m from the nearest GP surgery	Site is more than 4000m from the nearest GP surgery	
3.8	Access to Strategic Road Network	Employment (B class uses)	The site is immediately adjacent to the Strategic Road Network	The site is within 1km of the Strategic Road Network	The site is 1-3km from the Strategic Road Network	The site is 3-10km from the Strategic Road Network	The site is more than 10km from the Strategic Road Network

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
4.1	Brownfield and Greenfield Land	Housing, Traveller and Employment (B class uses)	Majority of the site is previously developed land within or adjacent to a settlement	Majority of the site is greenfield land within a settlement	Majority of the site is previously developed land that is neither within nor adjacent to a settlement	Majority of the site is greenfield land adjacent to a settlement	Majority of the site is greenfield land that is neither within nor adjacent to a settlement
4.2	Impact on agricultural land	Housing, Traveller and Employment (B class uses)			Development of the site would not result in the loss of agricultural land	Development of the site would result in the loss of poorer quality agricultural land (grade 4-5)	Development of the site would involve loss of the best and most versatile agricultural land (grades 1-3)

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
4.3	Capacity to improve access to open space	Housing, Traveller and Employment (B class uses)		Development could provide an opportunity to improve links to adjacent existing public open space or provide access to open space which is currently private.	Development unlikely to involve the loss of public open space.	Development may involve the loss of public open space but there are opportunities for on-site off-setting or mitigation.	Development may involve the loss of public open space with no opportunities for on-site off-setting or mitigation.

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
5.1	Landscape sensitivity	Housing, Traveller and Employment (B class uses)			Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	Site falls within an area of high landscape sensitivity - characteristics of the landscape are vulnerable to change and unable to absorb development without significant character change.
5.2	Settlement character sensitivity	Housing, Traveller and Employment (B class uses)		Development may improve settlement character through redevelopment of a run-down site or improvement in townscape.	Development is unlikely to have an effect on settlement character.	Development could detract from the existing settlement character.	Development is likely to substantially harm the existing settlement character.

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.1	Topography constraints ¹⁴	Housing, Traveller and Employment (B class uses)			No topography constraints are identified in the site.	Topographical constraints exist in the site but there is potential for mitigation.	Topographical constraints in the site may preclude development.
6.2a	Distance to gas and oil pipelines	Housing, Traveller and Employment (B class uses)			Gas or oil pipelines do not pose a constraint to the site.	Gas or oil pipelines may constrain part of the site but there is potential for mitigation.	Gas or oil pipelines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site

¹⁴ It is noted that topographical constraints will not be a relevant consideration for all residential and employment (Use Class B) sites. Nevertheless, given the large number of sites which will be subject to the SSM and the undulating land form in parts of the District, the inclusion of this criterion is considered to provide additional information which can assist in understanding the characteristics of each site. Also, where appropriate, the Council has sought to align the approach taken in the SSM and TSSM. Discussions with the traveller community have indicated that the topography of a site does materially alter the suitability of a site for stationing caravans; undulating sites are considered less suitable by the traveller community due the constraints this poses in situating caravans on the site. In light of these considerations, the Council considers it is appropriate to assess sites for their topographical constraints but acknowledges that this criterion should not be given undue weight when deciding which sites proceed to Stage 3. Accordingly, sites will not be discounted from consideration in the site selection process solely on the basis of how they score on this criterion.

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.2b	Distance to constraining power lines	Housing, Traveller and Employment (B class uses)			Power lines do not pose a constraint to the site.	Power lines may constrain part of the site but there is potential for mitigation.	Power lines pose a major constraint to development. They will be difficult to overcome and affect a large part of the site
6.3	Impact on Tree Preservation Order (TPO) trees	Housing, Traveller and Employment (B class uses)			The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site	The intensity of site development would be constrained by the presence of protected trees either on or adjacent to the site	The site has severely limited feasibility for development as a result of the extensive presence of protected trees, either on or adjacent to the site

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.4	Access to site	Housing, Traveller and Employment (B class uses)		Suitable access to the site already exists.	Access to the site can be created within landholding to adjacent to the highway.	Potential for access to the site to be created through third party land and agreement in place, or existing access would require upgrade.	There is no means of access to the site and no likely prospect of achieving access.
6.5	Contamination constraints	Housing, Traveller and Employment (B class uses)			No contamination issues identified on site to date.	Potential contamination on site, which could be mitigated.	Potential severe contamination on site, where assurances would have to be sought from the developer that remediation would not harm site viability.

Traveller Site Selection Methodology

Ref.	Criteria	Land use applicable	Score				
			(++)	(+)	0	(-)	(--)
6.6	Traffic impact	Housing, Traveller			Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to significantly affect congestion.	Low level congestion expected at peak times within the vicinity of the site.	Moderate peak time congestion expected within the vicinity of the site.

Traveller Site Selection Methodology

Appendix B Stages 6 and 8.6 Criteria

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
1	Availability				
1.1	Site ownership	Housing, Traveller and Employment (B class uses)	Site is in single ownership	Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties	Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme
1.2	Existing uses	Housing, Traveller and Employment (B class uses)	There are no existing uses on-site or existing uses could cease in less than two years	Existing uses on-site which could cease between two and 10 years	Existing uses on-site where the use could cease in more than 10 years or the timescale for on-site uses ceasing is unknown
1.3	On-site restrictions	Housing, Traveller and Employment (B class uses)	Site is not subject to any known restrictions	Site is subject to restrictions but agreement in place or being negotiated to overcome them, or not judged to be a constraint	Site subject to restrictions and there is limited prospect of the restriction being overcome
1.4	Availability	Housing, Traveller and Employment (B class uses)	Site expected to be available between 2016 and 2020	Site expected to be available between 2021 and 2025	Site not expected to be available until at least 2026 or site availability is unknown

Traveller Site Selection Methodology

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
2	Achievability				
2.1	Marketability	Housing and Employment (B class uses)	Site is under option to a developer	Site is being actively marketed for development or enquiries have been received from a developer	Site is not being actively marketed
2.2	Site viability	Housing and Employment (B class uses)	No viability issues identified	Site viability is marginal or weaker demand for development	Viability and the market for development is poor
2.3	On-site physical and infrastructure constraints	Housing, Traveller and Employment (B class uses)	There are no known on-site constraints which would impact upon deliverability	On-site constraints have been identified but mitigation or design solutions mean that there would be no impact upon deliverability	Identified on-site constraints may impact upon deliverability
2.3a	Primary Schools (Planning Area)	Housing, Traveller	Site is located within a Primary Forecast Planning Group that has existing and future capacity	Site is located within a Primary Forecast Planning Group that does not have capacity, however has the potential to expand in the future	Site is located within a Primary Forecast Planning Group with no capacity, and limited scope to expand in the future
2.4b	Primary Schools (Individual)	Housing, Traveller	Site is located within 1km of a primary school with existing and future capacity	Site is located within 1km of a primary school with either a current or forecast capacity deficit	Site is not located within 1km of a primary school
2.5a	Secondary Schools (Planning Area)	Housing, Traveller	Site is located within a Secondary Forecast	Site is located within a Secondary Forecast Planning Group that does	Site is located within a Secondary Forecast Planning Group with no

Traveller Site Selection Methodology

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
			Planning Group that has existing and future capacity	not have capacity, however has the potential to expand in the future, either through the expansion of existing schools or the provision of a new school site	capacity, and limited scope to expand in the future
2.5b	Secondary Schools (Individual)	Housing, Traveller	The site is located within 1km of a secondary school with current capacity and no forecast deficit	Site is located within 1km of a secondary school with either a current or forecast capacity deficit	Site is not located within 1km of a secondary school
2.6	Access to open space	Housing, Traveller	Site is located within 400m of existing publicly accessible open space, or there are proposals for new on-site open space provision as part of the development	Site is located 400-600m from existing publicly accessible open space	Site is more than 600m from existing publicly accessible open space
2.7	Health	Housing, Traveller	Site is located within 1km of a GP surgery with capacity	Site is located within 1km of a doctors surgery with no capacity	Site is not located within 1km of doctors' surgery
2.8	Impact on Minerals Deposits	Housing, Traveller and Employment (B class uses)	None of the site is located within a minerals safeguarding area	Part of the site is located within a minerals safeguarding area, but possible impacts could be mitigated	Part of the site is located within a minerals safeguarding area and impacts could not be mitigated, or the whole of the site is within a minerals safeguarding area

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Traveller Site Selection Methodology

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
3	Cumulative achievability				
3.1	Impact on open space	Housing, Traveller	There are no identified current deficiencies in the quantum of open space within the settlement. No open space is lost as a result of the proposed allocations in the settlement.	There are no identified current deficiencies in the quantum of open space within the settlement, however the cumulative impact of the proposed allocations would result in a reduction in land for open space.	There is a current deficiency in the quantum of open space within this settlement. The cumulative impact of the proposed allocations would result in a reduction in land for open space.
3.2	Impact on primary schools	Housing, Traveller	The proposed allocations in the settlement can be accommodated within the current primary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current primary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding schools or identifying a new site	The proposed allocations in the settlement would lead to a shortage of current primary school places in the Schools Planning Area. There is limited scope to further expand school provision due to site constraints
3.3	Impact on secondary schools	Housing, Traveller	The proposed allocations in the settlement can be accommodated within the current secondary school places in the Schools Planning Area. There is potential to accommodate growth by either expanding	The proposed allocations in the settlement would lead to a shortage of current secondary school places in the Schools Planning Area. There is potential to accommodate growth by	The proposed allocations in the settlement would lead to a shortage of current secondary school places in the Schools Planning Area. There is limited scope to further

Traveller Site Selection Methodology

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
			schools or identifying a new site	either expanding schools or identifying a new site	expand school provision due to site constraints
3.4	Impact on Green Infrastructure (GI)	Housing, Traveller	The proposed site allocations provide opportunities to enhance Green Infrastructure	The proposed site allocations generally provide opportunities to enhance GI; on some sites there is likely to be some loss of GI	The proposed site allocations do not provide opportunities to enhance Green Infrastructure
3.5	Impact on Sewage Treatment	Housing, Traveller	Settlement is served by a Sewage Treatment Works which has known spare capacity or planned additional capacity	No known capacity issues, with further engagement with Thames Water to take place as part of the Infrastructure Delivery Plan	Settlement is served by a Sewage Treatment Works with known limited capacity
3.6	Impact on Central Line Capacity	Housing, Traveller	The proposed allocations in this settlement do not have a material impact on the current or expected forecast peak use of the Central Line stations within Epping Forest District	The proposed allocations in this settlement are expected to result in a minor increase in the expected forecast peak use of the Central Line stations within Epping Forest District, which will not affect the capacity of these stations	The proposed allocations in this settlement are expected to result in a moderate or major increase in the expected forecast peak use of the Central Line stations within Epping Forest District, which will affect the capacity of these stations
3.7	Impact on Water Networks	Housing, Traveller	Settlement is served by water and network with no known capacity issues	-	Settlement is served by water network which is unlikely to be able to meet additional demand -

Traveller Site Selection Methodology

Ref	Criteria	Land use applicable	Score		
			(+)	0	(-)
					upgrades to the existing infrastructure expected to be required
3.8	Impact on Wastewater Networks	Housing, Traveller	Settlement is served by wastewater network with capacity to meet additional demand	Settlement is served by wastewater network which may be unable to meet additional demand – local upgrades to the existing infrastructure expected to be required	Settlement is served by wastewater network which is unlikely to be able to meet additional demand – strategic infrastructure expected to be required