

# Gypsy & Traveller Accommodation Assessment

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Folkestone & Hythe District Council

Final Report - Addendum

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# 1. Introduction

- 1.1 Arc4 prepared a Gypsy and Traveller Accommodation Assessment for Folkestone and Hythe District Council which was published in August 2018. This identified a need for 5 additional Gypsy and Traveller pitches over the plan period to 2036/37 from households who meet the definition of Gypsy and Travellers as set out the Planning Policy for Traveller Sites<sup>1</sup>.
- 1.2 Having established a level of need for additional Gypsy and Traveller pitches, the Council is carrying out work to identify potential sites to meet this need. A long-list of sites has been identified from a variety of sources and work to assess these in terms of access and highways capacity, utilities infrastructure, landscape and townscape impact, wildlife and nature conservation, heritage, proximity to local facilities; and residential amenity has resulted in a potential short-list of seven sites with potential for small scale development.
- 1.3 The specific purpose of this addendum report is to review the appropriateness of these sites for the Gypsy and Traveller community and the potential impact on the wider settled community. As part of the work, Arc4 liaised with local Gypsy and Traveller families in the district to establish:
- Whether they would be willing to create additional pitches on their site;
  - If so, would they be willing to share their site with other members of the travelling community if they were not part of their family;
  - Do they own any land which they would be willing to place more Traveller pitches.
- 1.4 The Addendum report is structured as follows:
- Section 2 considers the general policy context for this work and in particular focuses on the criteria for appropriate site development as set out in the 2015 PPTS;
- Section 3 reviews the sites identified for potential development;
- Section 4 considers the findings of consultation with the Travelling community;
- Section 5 considers the findings of consultation with housing associations;
- Section 6 provides concluding comments.

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<sup>1</sup> DCLG *Planning policy for traveller sites*, August 2015, paragraph 3

## 2. Policy context

- 2.1 The Ministry of Housing, Communities & Local Government 'National Planning Policy Framework' published in February 2019 sets out clear guidance and expectations for local planning authorities to ensure that within the adoption of its local plan that it must consider the delivery of a sufficient supply of homes distinguished by size, type and tenure for different groups in its communities including travellers.
- 2.2 Within this policy framework it is incumbent on planning authorities to have a clear understanding of the land available in its area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.3 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 while respecting the interests of the local community. In particular, 'Planning Policy for traveller sites' published August 2015, sets out some broad prescriptive requirements for identifying suitable sites for the provision of Gypsies and Travellers. The key objective is to ensure that traveller sites are sustainable economically, socially and environmentally. As such any potential sites should be assessed bearing in mind the following:-
- Promote peaceful and integrated co-existence between the site and local community
  - Promote, in collaboration with commissioners of health services, access to appropriate health services
  - Ensure that children can have access to local schools
  - Provide a settled base that reduces both the need for long distance travelling and possible environmental damage caused by unauthorised encampment
  - Provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development
  - Avoid placing undue pressure on local infrastructure and services
  - Do not locate sites in areas at high risk from flooding, including functional flood plains, given the particular vulnerability of caravans
  - 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.
- 2.4 Thereafter, in the actual consideration of any planning application for the establishment of a traveller site, the planning authority should give weight to:-
- (a) Effective use of previously developed (brown field), untidy or derelict land.
  - (b) Sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness.
  - (c) Promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children.

- (d) Not enclosing a site with so much hard landscaping, high walls or fences that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.

## 3. The Sites

### Introduction

- 3.1 The Council has identified a number of possible sites either within their corporate ownership or land which present owners have indicated a willingness to dispose of.
- 3.2 A total of seven sites were short-listed based on having potential for small scale development. The appropriateness of these sites for Gypsy and Traveller pitches has been assessed in the context of recommended practice of Government. The majority of these sites were generally considered to be semi-rural in nature and a mixture of underutilised and/or former industrial land, scrubland and unwanted farming land. A couple of the sites were considered to be remote from the established communities, quite large areas themselves, and a distance from any shops, local schools and doctors; although where this is the case it is understood that infill development is proposed as part of the adopted Core Strategy (2013). The essence of Traveller sites is to ensure that they are able to integrate into local communities but with sensitive design and locations. In this regard there are three specific sites that have potential for development as Gypsy and Traveller sites.
- 3.3 The seven sites are:
- GT11: Land west of Cockreed Lane, New Romney
  - GT12: Brickyard Poultry Farm, Cockreed Lane, New Romney
  - GT13: Craythorn Farm, Cockreed Lane, New Romney
  - GT16: Highways Depot, Running Waters Corner, New Romney
  - GT17: Station Approach, New Romney
  - GT19: Land north of Kitewell Lane, Lydd
  - GT20: Land south of Kitewell Lane, Lydd
- 3.4 A commentary on each site based on site observation now follows.

### GT11: Land west of Cockered Lane, New Romney

- 3.5 Located less than half a mile from the town centre of New Romney, this is a large flat rectangular site that is open to the wider landscape which gives it an established rural feel. However, it is understood that the land in between the existing settlement boundary and the site is allocated for housing in the Core Strategy and an application is with the Council for determination. The northern boundary is defined by the Wallingham sewer drain and the southern boundary by Cockreed Lane itself, which connects a relatively low number of sporadic detached and semi-detached houses. The site would have the potential to accommodate a significant number of permanent or transit pitches. However, the issue is the scale of local opposition to any proposal given the proximity to the new 'Mulberry Place' development by Pentland Homes. This development, which is less than 200m from the site, is offering a range of homes for sale, shared ownership and affordable rent with the larger detached properties commanding sales values above £600,000. Any application to establish a site for

Gypsies and Travellers will inevitably be met with fierce opposition given the perception a site would have on the value of the new homes.

### GT12: Brickyard Poultry Farm, Cockreed Lane, New Romney

- 3.6 Lying directly adjacent to the rectangular site at Cockreed Lane, this site is a quarter of the size of its neighbouring opportunity and enjoys the same advantages in terms of vehicle access, connection to utility services and proximity to the town centre with a range of local facilities less than half a mile away. The site has a number of low level agricultural buildings and is screened from the wider landscape by an established line of mature trees. However, it equally suffers from its seemingly rural nature and close proximity to the 'Mulberry Place' development by Pentland Homes; as well as the planned infill development opposite. Furthermore, the site itself on the western side is next to a row of distinctive, detached family residences which inevitably would be impacted by the establishment of any development.

### GT16: Highways Depot, Running Waters Corner, New Romney

- 3.7 Accessed off a layby from the main A259 highway that runs through New Romney, this is a small secure site that sits on a tight bend and used by Kent County Council's road surfacing team to store aggregate materials on an ad hoc basis. The site benefits from existing hardstanding and is well distanced from any substantial residential houses so local opposition would in some respects be minimal however equally. It is considered reasonably close to local facilities being just over half a mile from the town centre and served by a continuous footpath connecting the site and the town. . The size and shape of the site may be restrictive in meeting the requirements of four residential pitches; but it may be suitable for some very short stay transit accommodation given that it is in effect hidden from the main road by mature trees. The practicality of connecting utilities may be cost prohibitive given the extent of service runs required to this land.

### GT13: Craythorn Farm, New Romney

- 3.8 This is a relatively small site that sits within a much larger farmland holding. The site is accessed off Cockreed Lane with good connections to the main A259 highway and although linked to the town centre by a continuous footpath it is considered to be reasonably distant from local facilities just under a mile away. The site would only be able to accommodate a small number of pitches, and would be too small for temporary accommodation for carnivals. Inevitably due to the established rural feel of the immediate area, the openness of the fields that this site sits within; and the residential housing opposite, there would be considerable local objection to any development of this site.

### GT17: Station Approach, New Romney

- 3.9 Located in between the settlements of New Romney and Littlestone in a semi commercial area, this vacant site would have previously had some form of commercial use associated with it. The site is easily accessed off the adopted highway and although connected to the town centre by a continuous footpath this site would be considered distant from local facilities approximately one mile away. The size, location, and positioning of the site immediately off an existing road creates an ideal basis to establish either a permanent or transit site for Travellers with opportunities for a live/work arrangement. Given the relative distance and screening of the site by mature trees and bushes from the existing residential houses and the small number of commercial units operating on Station Approach itself, local opposition could be minimal.

### GT19 Land north of Kitewell Lane, Lydd

- 3.10 This site is in Council ownership. It has good potential to establish an initial phase of several pitches with the opportunity to extend further if future demand and needs of the settlement justifies additional pitches. . Kitewell Lane is accessed off Station Road which leads to the centre of Lydd; and although connected to the town centre by a continuous footpath this site is reasonably distant from local facilities approximately one mile away. It is however a well-established road with a mix of uses which includes light commercial, public buildings, a small amount of residential as well as a static caravan park.. The access to the site itself is along a narrow track that passes in between the former ambulance station on one side and two detached properties on the other; both of which are screened by mature hedges and panel fencing. The cost of connecting utilities from Kitewell Lane may be high given the extent of service runs required to this land.
- 3.11 The site has the potential to be developed either as a permanent location for the travelling community or as a temporary site for carnival workers. Development for either use is unlikely to have an adverse effect on the local community given the existing uses off Kitewell Lane and its distance from the main centre of Lydd. . The site lends itself to being well screened from the rest of the existing uses yet still integrated into the local vernacular. Some thought may be needed to ensure that any development is enclosed to ensure the safety of any children that may reside given the openness of the land to the fields and railway track beyond.

### GT20 Land south of Kitewell Lane, Lydd

- 3.12 This site is in Council ownership. It is undeveloped scrub land that is rectangular in shape and quite large. The site can be accessed directly off of Kitewell Lane immediately opposite the former ambulance station as well as Poplar Avenue. The town centre and local facilities are reasonably distant being approximately a mile away; but is connected by a continuous footpath. Similar to the site opposite, it is situated amongst a mix of uses with existing commercial buildings on either side. Utilities are present and could easily be extended into the site. The site would be suitable for Travellers in terms of locality for the very same reasons that the land behind the opposite ambulance station is suitable. Also given the uses on either side,



a few pitches established immediately off Kitewell Lane would from an urban layout complete the aesthetics of the road.

- 3.13 The issue here concerns the scale of a site as opposed to the suitability of the site. Poplar Avenue is a well-established residential area with many houses semi or detached and built new as recently as 2014. This road and the neighbouring Megan Close are considered to be of highly sought-after roads to live by local estate agents and prices have risen by over 30% since the development was first completed. Hence, any large redevelopment of this site for Gypsies and Travellers may be met by some local objection. It would not be pragmatic to establish pitches here without considering the development potential of the rest of the site. One route that may be worth exploring is to work in partnership with a local housing association to bring forward ideas for developing an affordable housing scheme that can have integrated into the design a new settlement for Gypsies and Travellers accessed separately from Kitewell Lane. With sensitive design, a new scheme has the potential of integrating play facilities which would be accessible for all the community and provide an amenity buffer between the new homes and the traveller pitches.

## 4. Gypsy and Traveller Community Consultation

- 4.1 Consultation with the existing Gypsy and Travellers community has been mixed and is perhaps reflective of an inherent suspicion that exists within the community to any direct approach from local government to speak with them about their day to day housing needs. This is perhaps not surprising given the prejudice the community experiences from the wider public regarding their culture and lifestyle, as well as the perceived lack of support from the local council to individual housing problems.
- 4.2 Site visits to existing sites within the district were made between the 4<sup>th</sup> and 6<sup>th</sup> of April 2019 and residents were specifically asked the questions outlined in paragraph 1.3:
- Whether they would be willing to create additional pitches on their site;
  - If so, would they be willing to share their site with other members of the travelling community if they were not part of their family;
  - Do they own any land which they would be willing to place more Traveller pitches.
- 4.3 Discussions with residents did not glean any more meaningful data over and above the responses received from the survey fieldwork carried out as part of the 2018 GTAA. The GTAA indicated that neither of the two existing sites could be expanded (that is extended to cover a larger area) or intensified (that is to have more pitches developed on the site).
- 4.4 However, for those residents who were willing to speak directly about their own individual needs, it was suggested that additional sites were needed to accommodate the needs of families who were increasing in size.
- 4.5 Experience suggests that discussing housing needs and demand directly with local residents is far more productive if a specific site or local area can be identified as the source of the potential provision. In this context, if the Council in the future intends to progress with either the opportunities identified in New Romney or Lydd (sites GT17, GT19 and GT20), it would be far more beneficial from a consultation perspective to invite the local Gypsy and Travellers community to an initial design brief meeting with an appointed architect or local housing association to formulate the specific design and need requirements.

## 5. Housing Associations

- 5.1 Although there are a number of housing associations with ownership and management of stock in the Folkestone & Hythe District area as a whole and more specifically within New Romney and Lydd itself, none of them have any direct experience of managing Gypsy and Traveller sites.
- 5.2 Approaches to quite large associations such as Places for People, Southern Housing Group, and Hyde Housing Association has been met with some interest provided the housing provision required is of a size and substance to justify the capital and revenue investment. This is not reflective of any laissez-faire attitude to the need to provide for this specific target group but was largely driven by an acknowledgement that providing such accommodation was more akin to specialist supported housing than traditional mainstream provision. The extent to which grant funding can be secured from Homes England is also a major consideration.
- 5.3 Clearly, the three sites identified have potential to provide for quite substantive sites, either permanent or transit, and preliminary conversations with the housing associations referred to previously suggest that there may be some willingness to consider the development of a scheme provided that there was a specialist support worker/organisation involved in the direct management of the accommodation.
- 5.4 Obviously this presents a local challenge given the lack of any such network in the immediate locality albeit there are a number of support groups for Gypsies and Travellers within the south, primarily London, such as CARA. Shelter too as an organisation are very much active in supporting awareness of the needs of this group and have started developing a database of recognised bodies throughout the country committed to addressing the housing needs of this community.
- 5.5 Depending on the age profile of the existing Gypsies and Travellers, it may be that engaging with a specialist association such as Housing 21 or Anchor, both of whom specifically provide sheltered accommodation, may be more appropriate. Certainly both organisations have a management presence in this locality and therefore may be willing to consider a diversification of their management and support offer.

## 6. Concluding comments

- 6.1 The 2018 GTAA established a need for five additional Gypsy and Traveller sites in the district. For this addendum report, Arc4 has carried out an assessment of seven potential development sites; discussed ways of addressing need with local Gypsy and Traveller residents; and explored the extent to which Housing Associations would be interested in developing sites.
- 6.2 Three specific sites are recommended for further consideration as Gypsy and Traveller Sites:
- GT17: Station Approach, New Romney
  - GT19: Land north of Kitewell Lane, Lydd
  - GT20: Land south of Kitewell Lane, Lydd
- 6.3 The four other sites are not recommended for several reasons including proximity to existing residential development, rurality and cost of providing service utilities. However, the highways depot could potentially be suitable for some very short stay transit accommodation.
- 6.4 It is not possible to address future pitch need through the expansion and intensification of existing sites. This was established in the 2018 GTAA and confirmed through discussions with local residents.
- 6.5 There has been interest shown from local Housing Associations in developing and managing Gypsy and Traveller sites, provided that there was a specialist support worker/organisation involved in the direct management of the accommodation.