



## Epsom & Ewell Local Plan: Traveller Site Accommodation Assessment



**Epsom & Ewell Local Plan  
Traveller Site Availability Assessment  
June 2017**

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**1. Introduction**

- 1.1 Epsom & Ewell's Gypsy and Traveller communities make a valued contribution towards the cultural mix of the Borough. Like all residents of the Borough, they deserve a place to call home. It is the Borough Council's responsibility to ensure that their specific accommodation needs are met.
- 1.2 The Epsom & Ewell Traveller Site Availability Assessment (the Assessment) sits alongside the Borough-wide Traveller Accommodation Assessment (TAA) and will help inform the development of the Epsom & Ewell Local Plan.
- 1.3 The Assessment provides an overview of the potential sources of traveller accommodation; the constraints to supply; and the site options that are genuinely available for consideration through the Local Plan process. The outputs from the Assessment will be used, alongside the TAA, to inform the identification of possible site allocation options as part of the Issues and Options stage. The Assessment will also serve as evidence throughout the subsequent examination of the Local Plan.

**Methodology**

- 1.4 Work on identifying potential site allocation options for new additional Traveller accommodation provision has been underway for some time. Much of this work has been carried out in parallel with the Borough-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). Whilst the detailed site requirements for new Traveller accommodation are different from those impacting upon new housing, they both share significant similarities. Consequently, in basic terms the methodology applied to this Assessment runs in parallel to that used in the Borough-wide SHLAA.
- 1.5 The first stage of the Assessment process is to establish the scale of need. The Borough-wide TAA provides an overview of the projected need generated by the growth of the Borough's existing Traveller communities. In accordance with national policy it refines that projected need against the planning definition of 'Gypsies and Travellers' as set out in "Planning Policy for Traveller Sites". This provides the Assessment with a baseline position of future need.
- 1.6 The second stage of the Assessment provides an overview of existing Traveller accommodation provision across the Borough. This provides an overview of existing capacity.
- 1.7 The Assessment then considers the issues that impact upon supply and availability. This element of the Assessment should be considered alongside more detailed analysis of Borough-wide

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constraints set out other evidence base documents, such as the Epsom & Ewell Green Belt Study; the Environmental Character Study; Green Infrastructure Study; and Constraints Study.

- 1.8 Following on from the above the Assessment sets out the process that the Borough Council followed in identifying and giving consideration to possible candidate site allocation options. This process concluded with the identification of site allocation options that were considered to be genuinely available, deliverable and relatively unconstrained potential sources of supply. The Assessment offers any such sites up to the Local Plan Issues & Options stage for consideration through public consultation.

**2. Future Need**

**The Epsom & Ewell Traveller Accommodation Assessment**

- 2.1 The TAA has been prepared to inform our emerging local planning policies in respect of meeting the needs of our Gypsy & Traveller communities. It forms the basis on which we will identify the scale of new site allocations to meet any accommodation needs up to 2032. This Assessment is an update to the 2014 document. It takes full account of the changes to the National Planning Policy for Traveller Sites document published during August 2015 and brings all available data up to date.
- 2.2 The TAA has been produced in accordance with National Planning Policy and through utilising a modified version of The Surrey Methodology. It includes a desktop review of existing local authority data together with the preparation of family generation trajectories for both of our existing Gypsy & Traveller sites.
- 2.3 Our latest TAA takes into consideration the changes in national policy relating to the planning definition of 'Gypsies and Travellers'. The key change is that now those people who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a TAA.
- 2.4 The first stage of the TAA process identified a need for 27 new additional pitches and zero Travelling Showpeople plots over the period 2017-2032. Of these 14 pitches will be needed to accommodate growth during the first five years, up to 2022. This equates to an annualised requirement of 1.8 pitches and zero plots. There is no identified need for transit accommodation over the period 2017-2032.
- 2.5 The second stage of the TAA process evaluated that initial level of need against the planning definition of 'Gypsies and Travellers'. Upon

application of the new planning definition, the TAA determined that there is zero need for new additional pitches for 'Gypsies and Travellers'- as defined by National Planning Policy. Consequently, the TAA concludes that there is no requirement for new additional pitches to meet the accommodation needs of local Gypsy and Traveller communities.

### **The Needs of the Non-Travelling Traveller Communities**

- 2.6 The implication of the change to the planning definition is that the housing needs of those members of our Traveller community who do not meet the new 'planning' definition of a Traveller will not form part of the 'Gypsy and Traveller' need identified in the TAA. Nevertheless, the Borough Council has duty under the Housing and Planning Act (2016) to 'consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed'. Furthermore, the Equalities Act requires that Romany and Irish Travellers are provided with culturally sensitive and appropriate accommodation (IE mobile homes) even if they do not 'travel'.
- 2.7 On that basis and for the purposes of the Assessment, it is assumed that the future accommodation needs of local non-travelling Travellers will be incorporated, along with other specialised forms of accommodation need<sup>1</sup>, within the Borough's wider housing need. Such an approach could identify the accommodation needs of the non-travelling Traveller community as a subset of the wider need arising from 'households residing in caravans'. Whilst national planning policy does not place a requirement upon local planning authorities to consider and meet such need, it is both prudent and sound for this matter to be fully considered as part of the Local Plan process. Failure to do so could result in the Local Plan being challenged and found unsound at the examination stage.
- 2.8 On that basis the TAA recommends that the projected scale of non-travelling Traveller accommodation need be used to inform the preparation of the Plan. These components total a 27 pitch need over the next fifteen years, with a 14 pitch need in the first 5 years.
- 2.9 Evidence emerging from other Local Plan evidence base studies demonstrates that development land is in very high demand across the Borough. The competition for housing development land will continue to be high. In particular the initial conclusions from the Borough-wide SHLAA indicate that there will be unmet need across all sectors of housing demand. On that basis, the Assessment concludes that it is highly likely we will be unable to identify sufficient available and deliverable sites to meet all of the non-travelling Traveller accommodation need. Nevertheless, as with other forms of

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<sup>1</sup> For example, the need for new student accommodation; sheltered accommodation for the elderly; and specialised close-care accommodation for the elderly and infirm.

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housing demand the Borough Council must plan positively to meet as much of the need as possible.

**3. Current/ Existing Provision**

- 3.1 There are currently two Gypsy and Traveller sites located within the Borough. Both sites are located within the existing built-up area. The first of these sites is the Greenlands site, Cox Lane, which is located in the north of the Borough adjacent to the Bonesgate River. The second site is the Conifers, Kiln Lane, which is located to the north of Epsom Town Centre, adjoining the Nonsuch Trading Estate. Both are public sites managed by the County Council.
- 3.2 Between them the two sites have a total of 23 pitches. All of the pitches are currently occupied.
- 3.3 The Borough Council is also responsible for ensuring that there is an appropriate level of temporary accommodation provided to the Traveller community during the annual Epsom Derby Festival<sup>2</sup>.
- 3.4 The Borough Council considers the Greenlands site at Cox Lane to be a successful community, where the members of the Traveller community are happy and have successfully integrated with the other local communities across Ruxley Ward. However, the Greenlands site is operating at full capacity and there are now not enough pitches to meet the current needs of the families who have made this site their home. Consequently, it is acknowledged that there is an urgent requirement to provide additional space for these families.
- 3.5 The Conifers site on Kiln Lane is in all respects the most sustainably located Traveller site in the whole of Surrey. It is highly accessible to a wide range of facilities, services and amenities. The occupancy and capacity of the Conifers site has fluctuated over the last ten years. Until recently the Conifers site had physical capacity (in terms of empty pitches) to accommodate additional families. However, the site has since been reconfigured, with the unoccupied pitches being consumed by the occupied pitches. Whilst there is now no spare capacity within the site to house new families, the existing occupied pitches do retain some 'flex' to meet the accommodation needs of existing resident families within the short term.
- 3.6 Outside of the above two sites there has been no new accommodation, either public or private provided with the Borough since 1970. This reinforces the Borough Council view that need,

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<sup>2</sup> The Derby Festival has well established historic links with our nation's Traveller communities.

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within Epsom and Ewell, is being generated by the Borough's existing communities rather than from in-migration.

- 3.7 In terms of other accommodation, the Roveries site, which adjoins the Greenlands site in the north of the Borough, has served to provide a plot for Travelling Showpeople. This is a privately owned site. Over the last five years the use of this site has diminished. We understand that the original owners/ occupiers are in the process of or have retired from the business.

**4. Potential Sources of Supply**

- 4.1 Epsom & Ewell is located in north Surrey and borders greater London. It has a population of about 72,000 people and covers an area of 3,411 hectares. It is the most densely populated Borough in Surrey.
- 4.2 Approximately half of the Borough is comprised of existing built-up area. The Borough's built-up area is enclosed on its western, southern and eastern sides by Green Belt.
- 4.3 The Borough's built up area is comprised of a wide variety of very distinctive residential and commercial areas. Many of these are covered by conservation area designations. The Environmental Character Study identifies the key characteristics and visual appearances of those urban areas beyond the conservation areas.
- 4.4 The Borough also contains a number of specific sites that have considerable biodiversity interest, most notably the Epsom Common Site of Special Scientific Interest (SSSI) and also local nature reserves at the Hogsmill and Horton Country Park.
- 4.5 The availability of land for development is severely constrained. For the purposes of the Assessment the following constraints have been highlighted:
- About 42% of the Borough is covered by the Metropolitan Green Belt. National planning policy states that Gypsy and Traveller accommodation is not an appropriate use for Green Belt land, which makes it a strong policy constraint to the identification of sources of new accommodation. The Assessment assumes that any potential site that is located within the Green Belt is not deliverable. Consequently these sites have been discounted.
  - Most of the Borough's Green Belt land has other constraints present that would (in the absence of the Green Belt designation) make deliverability problematic. These include a range of national and local ecological designations – from SSSIs, Sites of Nature Conservation Interest, local nature reserves and biodiversity opportunity areas. Equally, large

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areas of Green Belt are given over for formal and informal open space provision; much of which provides private market provision (typically in the form of golf or private members' sports clubs). Given the nature of these uses, coupled with landownership constraints, the opportunities offered by these sites are considered limited.

- Land values are very high; particularly within the existing urban area, where the cost of housing is very high. As a result sites located within the urban area are in high demand for redevelopment as open market housing and commercial uses. As a consequence most of the available land in the Borough may prove too expensive for the Traveller community to purchase and redevelop as accommodation.
- Traveller pitches need to be relatively open and cannot be developed to the same densities that bricks and mortar houses can be built. This means that Traveller pitches require a larger site area than the equivalent number of new houses<sup>3</sup>.

4.6 The fact that all of the need for new accommodation is generated from two sites operated by local authorities is significant. In simple terms the accommodation need in Epsom and Ewell is for more affordable provision. There is no evidence that the open-market will seek to meet that need. Consequently securing public money to deliver new public Traveller sites is a major obstacle. A single new pitch can cost up to £120,000<sup>4</sup>. Previously local authorities have been able to apply for grant funding from central government. However, this source of funding no longer exists. In order to address this issue the government has indicated that they expect social housing providers to step-in and fill this funding shortfall. Unfortunately, most social housing providers have little experience, or appetite, in delivering Traveller accommodation.

4.7 In conclusion, it would appear that the opportunities for new provision are extremely limited. The Borough is sharply divided, in geographic terms, between the built-up area and the Green Belt, which completely encloses it. Unlike other boroughs and districts (across the nation) that are comprised of a mix of rural and urban areas, there is no open countryside (so called white land), which readily lends itself to rural uses, such as new Traveller sites.

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<sup>3</sup> Government guidance on pitch size states that *an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area* (DCLG, 2008).

<sup>4</sup> This estimate includes the purchase costs of land, and the provision of water and electricity which may cost more/ or less depending upon the location of the site.



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- 4.8 On that basis it would appear that sites within or immediately adjacent to the existing built-up area may be the only source of supply for new Traveller accommodation.

**5. Potential Site Options**

- 5.1 The key output of this Assessment is the identification of potential sources of land supply that can be brought forward for new additional Traveller accommodation. In this respect the Assessment seeks to identify sites in parallel to the SHLAA, which performs a similar exercise albeit in respect of identifying potential sources of bricks and mortar housing land supply.
- 5.2 For clarification, it is stated from the outset that the Assessment, just like the SHLAA, does not allocate sites. Rather it seeks to identify land that could provide potential sources of supply. Those sites that are considered to provide viable, deliverable and available opportunities for new additional accommodation will require further testing through public consultation before being allocated.
- 5.3 The identification of potential site options was undertaken with the following process:
- Stage 1: Desk top search for sites. This was carried out by the Borough Council's Planning Policy Team, taking into consideration intelligence gained during the preparation of the Local Plan – inclusive of data gained during work on the Borough-wide SHLAA 2009. This work was undertaken during the final quarter of 2013.
  - Stage 2: Internal workshop to discuss site options. Officers from across the Council's services (including Planning, Housing Services, Property Services and the Countryside Team) considered the sites identified under Stage 1. This process began to discount sites that were considered inappropriate or undeliverable. It also sought to identify other sites that could be considered. This work was also undertaken during the final quarter of 2013.
  - Stage 3: The preparation of Site Options Consultation Paper. It was intended that this Paper would identify site options that could be tested through public consultation. This Stage would have taken place during the first quarter of 2014.
  - Stage 4: All-Party Member Working Group formed to discuss Issues and Options around meeting Traveller accommodation needs. The Working Group met during 2014, 2015 and 2016.
  - Stage 5: The Borough-wide SHLAA 2017. This key Local Plan evidence base document has sought to identify potential sources of supply to meet future housing need. It was prepared in

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accordance with national planning policy and took on board the direction of travel set out in the then recent Housing White Paper (Fixing our Broken Housing Market). It focused upon identifying potential sources of supply that are available and which could be delivered (with some certainty) during the plan period. This Stage of the process incorporated a call-for-sites exercise that provided an opportunity for landowners, developers and infrastructure providers to promote sites via the local plan process. This Stage was undertaken during the first half of 2017.

- 5.4 During Stage 1 of the process a total of fifteen candidate locations for new pitches were identified across the Borough. This Stage of the process took a “policy-off” approach to site finding; the intention being to ensure that all possible options were made available for consideration during the early stages. This equates to the often quoted “leave no stone unturned” approach proffered by Planning Inspectors during local plan examinations.
- 5.5 The locations identified during Stage 1 were in mainly located upon Green Belt sites either on the edge of or beyond the existing urban area. Nevertheless, this process did identify four candidate locations within the existing built-up area. All of the sites identified during this initial desk-stop stage were known to the Officers undertaking the Assessment, having come under consideration during the preparation of the original Borough-wide SHLAA (2009).
- 5.6 During Stage 2 fifteen locations were considered and were the subject of an internal consultation, engaging with the assembled corporate intelligence from the Planning Department, Housing Services (including Gypsy & Traveller Liaison), Property Services and the Countryside Team. The purpose of this exercise was to gain a fuller understanding of the identified locations and introduce a ‘sifting’ process that would discount those locations considered to be unavailable and undeliverable. The outcome of this Stage of the process was to discount all but four of the sites from further consideration.
- 5.7 The outputs from Stage 2 were used to inform the preparation and production of what had been intended to be a site option consultation paper. This document would have further informed the plan preparation process. It would have set out the anticipated Gypsy & Traveller Accommodation Need, as calculated by the Draft GTAA (2013)<sup>5</sup>, and sought comment on the four site allocation options that had emerged from the previous stages. However, this process

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<sup>5</sup> This initial iteration of the subsequent TAA was prepared prior to the changes in national planning policy. Consequently, the need for new additional Traveller accommodation was assessed against the previous definition.

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proved to be premature and ultimately abortive. Adverse public opinion, prior to publication of the site options, resulted in the consultation process being postponed and an alternative approach towards site assessment being taken.

5.8 In order to provide a secure environment for open discussion on this sensitive area of policy development, the Borough Council's Licensing & Planning Policy Committee agreed to the formation of an All-Party Gypsy & Traveller Working Group. Upon its formation, the Working Group convened to discuss a wide range of issues including the calculation of Traveller accommodation need; current provision; and possible site options. The Working Group provided a useful forum for the further consideration of the site allocation options identified during the previous stages. This included further visits to the potential site allocation options and the exploration of how the site options could be delivered.

5.9 The further consideration of the potential site allocation options by the Working Group resulted in three of the possible site allocations being discounted from the process. This is illustrated under Table 1.

**Table 1: Consideration of Possible Site Allocation Options (2015-16)**

Possible Site	Size	Potential Yield	Conclusions
Site 1 Extension to the Greenlands site, Cox Lane (into adjoin scrubland)	0.2 ha	About 3 – 4 pitches	This site option is located within the existing built-up area and offers a modest extension of existing provision. The adjoining scrubland lies within a designated Nature Reserve, which may prove to be an obstacle to allocation. <b>Take forward as a site allocation option.</b>
Site 2 The Roveries, Cox Lane	0.35 ha	Up to 6 pitches	The site is located within the existing built-up area. It is in private land ownership and at the time the intentions of the landowner were unknown. The site has subsequently come forward and been given permission (at appeal) for redevelopment as new housing. <b>Discount from the process on the basis that it is no longer available.</b>
Site 3 Land at Hook Road Arena	About 1.5 ha	Up to 30 pitches	The site lies entirely within the Green Belt. It is currently utilised for public open space uses. Development of the site as new

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			accommodation provision could result in significant conflict with the existing open space and neighbouring residential uses. <b>Discount from the process on the basis that the site is not appropriate for new Traveller accommodation and is not readily available.</b>
Site 4 Land south of the Manor, Christ Church Road	About 2.1 ha	Over 30 pitches	The site lies entirely within the Green Belt. It is sites within close proximity to Epsom Common SSSI and established residential uses. Development of the site as new accommodation provision could result in significant conflict with the adjoining protected habitats and neighbouring residential uses. <b>Discount from the process on the basis that the site is not appropriate for new Traveller accommodation and is not readily available.</b>

5.10 Stage 5 of the process provided an opportunity for further alternative options for potential locations of new Traveller provision to come forward. The associated call-for-sites exercise was open to landowners, developers, local communities and individuals as a forum to promote potential development sites – not just for new housing but also other uses and infrastructure. It provided a genuine opportunity for possible Traveller accommodation options to come forward. No new Traveller sites were promoted through this process.

**Extension to the Greenlands, Cox Lane**

5.11 An opportunity has been identified for a modest extension of the existing site beyond the bund to the south west. This extension would expand the site into the scrubland adjoining the site, which would provide space for an additional four pitches.

5.12 Work has been undertaken to establish the biodiversity value of the adjoining scrubland. Surrey Wildlife Trust undertook an assessment of the proposed extension, which revealed that there would be no significant harm to wildlife and habitat.

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- 5.13 The Working Group explored a number of other options to extend the site. This included an option that would have expanded the site onto Metropolitan Open Land to the northwest; located beyond the Borough boundary in the Royal Borough of Kingston-upon-Thames. This option was discounted primarily because new additional accommodation would be an inappropriate use with Metropolitan Open Land. The deliverability of such an option is also open to question - the Royal Borough of Kingston-upon-Thames has discounted opportunities for new accommodation located upon Metropolitan Open Land; and the cost of bridging the Bonesgate River would be prohibitive.
- 5.14 On that basis, the Assessment identifies this site as the only available and deliverable option for new additional Traveller accommodation.

## **6. Conclusions and Recommendations**

6.1 The Assessment has reached the following conclusions, from which a number of recommendations are noted for the purpose of informing the Local Plan making process.

- The Assessment notes the outputs of the Epsom & Ewell Traveller Accommodation Assessment. The Assessment highlights that the TAA has identified that there is no need for new additional pitches to meet the needs of local Gypsy and Traveller communities.
- The Assessments notes that there continues to be an accommodation need for non-travelling Travellers. This equates to 27 pitches over the next fifteen years. The Borough Council continues to have a responsibility to take account of this accommodation need as a component of the Borough's wider housing needs.
- The Assessment has taken account of local housing land supply issues and accepts that meeting all of the Borough's housing need is likely to be challenging. Nevertheless, it is recommended that the Borough Council must plan positively to meet as much of the need as possible.
- Need for accommodation is generated from within the two established public sites. There is no evidence that that the open-market will seek to meet that need.
- There are considerable constraints to identifying available and deliverable potential sites for consideration as new accommodation. The opportunities for new provision are limited. For example, the Green Belt, open space uses and protected habitats serve as considerable constraints.
- The process for identifying potential site allocation options resulted in the majority of suggested sites being discounted.
- The Assessment concludes that the option of extending the Greenlands site is the only available and deliverable option.
- The Assessments recommends that the Local Plan process includes a site allocation option that extends the Greenlands site as proposed.