



London Borough of Sutton

Gypsy and Traveller Evidence Paper
Needs Assessment and Site Search

March 2024

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SECTION ONE: Introduction

Background

- 1.1 The London Borough of Sutton Gypsy and Traveller Need Assessment 2024 (GTNA) provides the latest available evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across Sutton to inform the preparation of the next Sutton Local Plan.
- 1.2 The overall scope of the study is to ensure that the council has a robust evidence base to determine an appropriate level of residential pitch and transit provision over the period to 2041 and to identify the accommodation needs of Gypsies and Travellers to meet both the Planning Policy for Traveller Sites (PPTS) defined need (updated in December 2023) and the council's obligations under section 124 of the Housing and Planning Act 2016.

Gypsy, Traveller and Travelling Showpersons Definition

- 1.3 The GTNA 2022 adopts the definition of 'Gypsies and Travellers' set out within PPTS, which was published by the government in 2015. This sets out the following definition of 'Gypsies and Travellers':

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such."

- 1.4 In addition, PPTS 2015 provides the following 'clarification' for determining whether someone is a Gypsy or Traveller:

"In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances."*

- 1.5 The following definition of 'Travelling Showpeople' is set out in PPTS 2015:

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above."

- 1.6 In addition: 'For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use pitches for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment.'

- 1.7** It should be noted that Following the judgement in the Court of Appeal in the case of Smith v SSLUHC & Ors, the government is reverting the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from 19 December 2023 for plan and decision making. The government intends to review the approach to this area of policy and case law in 2024.

SECTION TWO: Planning Policy Context

Introduction

2.1 This chapter sets out the policy context within which this GTNA has been prepared

Legislation

2.2 Since the 1960s, there have been three Acts of Parliament which have had a major impact on Gypsy and Travellers. Although aimed at private caravan sites, the Caravan Sites and Control of Development Act (1960) had the effect of making it difficult for Gypsies and Travellers to buy and winter on small plots of land, unless they had a licence that could only be gained through planning permission. This law led to the closure of many sites traditionally used by Gypsies and Travellers. Even those staying on the private land of farmers who they were working for could no longer do so. The general effect of the Act was to push more Gypsies and Travellers on to the roadside.

2.3 In 1965, a national survey of Gypsies and Travellers took place and the subsequent report, published two years later, was called “Gypsies and Other Travellers”. The findings showed that 60% of the families had travelled in the previous year, mainly as a result of perceived harassment. Few children received regular schooling. Only 33% had access to a water supply. The report concluded that there were too few local authority sites.

2.4 The Caravan Sites Act (Part II) (1968) was a response to the survey and report. It required local authorities “so far as may be necessary to provide adequate accommodation for Gypsies and Travellers residing in or resorting to their area”. In return for supplying sufficient pitches, an authority was given additional powers to remove Gypsies and Travellers from unauthorised land within its area.

2.5 The Criminal Justice and Public Order Act (1994) repealed most of the 1968 Act, abolished any statutory obligation to provide accommodation, discontinued government grants for such sites and made it a criminal offence to camp on land without the owner’s consent. Since the 1994 Act, the only places where Gypsies and Travellers can legally park their trailers and vehicles are:

- i) Council-run Gypsy and Traveller sites. By 2000, nearly half of Gypsy and Traveller caravans were accommodated on council sites, although new council site provision stopped with the end of the statutory duty.
- ii) Privately owned land (usually by a Gypsy and Traveller) with appropriate planning permission, now accommodating a third of Gypsy caravans in England.
- iii) Some land with established use rights, other caravan sites or mobile home parks by agreement or licence, and land required for a seasonal farm worker (under site licensing exemptions).

- 2.6** However, by the late 1990s, pressure was being exerted on the Government to deal with the negative effects of the 1994 Act. Travellers were tending to group together into larger bands on fewer sites, leading in turn to higher public anxiety over their presence and further rounds of evictions.
- 2.7** A major review of policy resulted in the replacement of Circular 1/94 by Circular 1/2006 (see below) and guidance on accommodation assessments. In addition, Part 6 of the Housing Act 2004 contained several provisions designed to mainstream the provision of accommodation for Gypsies and Travellers alongside that of the settled community and to ensure that local authorities take a strategic approach to assessing and meeting the needs of Gypsies and Travellers as they do for the rest of the community. Importantly, the Housing Act 2004 required local authorities to include Gypsies and Travellers in their local housing needs assessments. As well as this Act, local authorities also needed to have regard to their other statutory duties, including those in respect of homelessness under the Housing Act 1996 (as amended by the Homelessness Act 2002) and to their obligations under the Race Relations (Amendment) Act 2000.
- 2.8** Circular 1/2006 required that a Gypsy and Traveller Accommodation Assessment was undertaken to identify need and allocate pitch requirements for a local authority area. The Regional Planning Board would then check or modify the pitch numbers provided by the Gypsy and Traveller Accommodation Assessment from a regional perspective. A Regional Spatial Strategy would specify pitch numbers for each local planning authority. Then, a local authority's Development Plan Document would identify specific sites to match the pitch numbers from the Regional Spatial Strategy. In addition to pitch requirements, Circular 1/2006 also set out arrangements for community involvement, the type of criteria required in a Core Strategy policy for Gypsies and Traveller site location and advice on searching for new Gypsy and Traveller sites.

Government Policy and Guidance

- 2.9** The 2023 National Planning Policy Framework states in Paragraph 63 *"the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies"*. It then lists a number of groups including Travellers. A footnote to the paragraph states 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document'.
- 2.10** The 2015 Planning Policy for Traveller Site (PPTS) document states that *"local planning authorities should make their own assessment of need for the purposes of planning"* and *"ensure that their Local Plan includes fair, realistic and inclusive policies"* and *"to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply"*.
- 2.11** Policy A of the 2015 PPTS relates to evidence needed to plan positively and manage development. This states *"in assembling the evidence base necessary to support their planning approach, local planning authorities should:*
- *pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups);*

- *cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and*
- *use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions”.*

2.12 Policy B of the 2015 PPTS relates to planning for traveller sites and requires Local Plans:

- *to be prepared with the objective of contributing to the achievement of sustainable development and consistent with the policies of the NPPF; and*
- *to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.*

2.13 Policy B (paragraph 10) sets out that local authorities should, in producing their Local Plan:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;*
- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;*
- consider production of joint development plans that set targets on a cross authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);*
- 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; and*
- protect local amenity and environment.*

2.14 Policy B (paragraph 13) sets out that local authorities should ensure that traveller sites are sustainable economically, socially and environmentally and therefore ensure that their policies:

- promote peaceful and integrated co-existence between the site and the local community;*
- promote, in collaboration with commissioners of health services, access to appropriate health services;*
- ensure that children can attend school on a regular basis;*
- 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 who may locate there or on others as a result of new development;*
- avoid placing undue pressure on local infrastructure and services;*

- g. do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and*
- h. reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting*

2.15 In March 2016 the government produced draft guidance on reviewing housing needs for caravans and houseboats which relates to clause 115 of the Housing and Planning Bill. The guidance recommended basic principles but the exact approach would need to be adapted to local circumstances. The guidance notes that ‘an understanding of the need for caravan sites and moorings for households is essential to make properly planned provision and avoid the problems of ad-hoc and unauthorised provision.’

2.16 Assessing the need for caravans and houseboats should include needs from households:

- *who have no authorised site anywhere on which to reside;*
- *whose existing site accommodation is overcrowded or unsuitable, but who are unable to obtain larger or more suitable accommodation;*
- *who contain suppressed households who are unable to set up separate family units;*
- *who are unable to access a place on an authorised site, or obtain or afford land to develop on; and*
- *In bricks and mortar whose existing accommodation is overcrowded*

2.17 All of these factors are considered as part of the Gypsy and Traveller household survey.

2.18 The guidance is concerned with all those who have a need for caravans and houseboats which includes, but not restricted to, bargees, Romany Gypsies, Irish and Scottish Travellers, new-age Travellers and Travelling Showpeople.

2.19 The draft guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of a nomadic/semi-nomadic habit of life; a preference for caravan/houseboat dwelling; their presence on unauthorised encampments. The need for storage of equipment and maintenance is a specific need of Travelling Showpeople.

2.20 The process of carrying out an accommodation needs assessment is then set out. This makes reference to:

- *Close engagement with communities throughout the whole process and that the work is fully explained from the outset;*
- *Use existing data such as caravan counts, site management data, review of planning applications and available data from service providers;*
- *Conducting a specialist survey.*

2.21 The guidance then identifies two key outcomes: an understanding of current need and future need.

Regional Policy and Guidance

2.22 The Mayor of London planning policy position on gypsy and travellers is set out in the 2021 London Plan and makes clear that Boroughs should actively plan for gypsy and travellers' accommodation needs. Policy H14 'Gypsy and Traveller Accommodation' states that:

- A) *Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches and must include ten-year pitch targets in their Development Plan Documents.*
- B) *Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for gypsy and traveller accommodation provided in Table 4.4 as identified need for pitches until a needs assessment is undertaken as part of their Development Plan review process.*
- C) *Boroughs that have undertaken a needs assessment since 2008 should update this as part of their Development Plan review process.*
- D) *Boroughs should undertake an audit of existing local authority provided gypsy and traveller sites and pitches, working with residents occupying these, identifying:*
 - 1) *areas of overcrowding*
 - 2) *areas of potential extra capacity within existing sites*
 - 3) *pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).*
- E) *Boroughs should plan to address issues identified in the audits.*
- F) *Boroughs should actively plan to protect existing gypsy and traveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.*

2.23 The London Plan commits the Mayor to leading a London-wide gypsy and traveller accommodation needs assessment and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation. However, until the findings of this new London-wide needs assessment are available for use in Development Plans, the London Plan states that boroughs should continue to plan to meet the need for permanent gypsy and traveller pitches in accordance with the requirements of Policy H14 Gypsy and traveller accommodation, with a particular focus on Part B, which signposts to London Plan Table 4.4 and its need figures.

Figure 2.1: London Plan Table 4.4: Need for gypsy and traveller pitches from London Gypsy and Traveller Accommodation Needs Assessment 2008

Borough	Need
London borough of Sutton	11 Pitches

2.24 The Mayor commissioned consultants to start preparing the Gypsy and Traveller Accommodation and Needs Assessment (GTANA) in early 2022 and this work is now underway. This study looks at the need for pitches over two 5 year periods: 2022/23 to 2026-27 and 2017/28 2031/32.

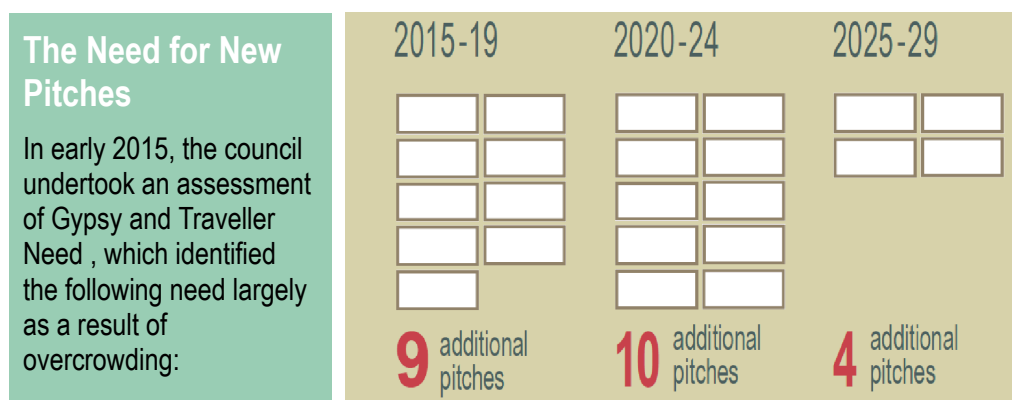
2.25 Calculations are based on a model suggested in DCLG (2007) guidance. The basic premise of the model is that, by comparing current and projected accommodation provision with gross current and projected accommodation need, it is possible to calculate net current and projected accommodation need.

Local Policy and Guidance

2.26 Sutton is home to two Gypsy and Traveller sites, both on Carshalton Road near Woodmansterne. One site is privately owned and is occupied by Irish Travellers and the other is a council site which is occupied by both English Gypsies and Irish Travellers. The private site has recently intensified its use and so need is generally being met there but the council site is significantly overcrowded, with multiple families living on one pitch.

2.27 The Sutton Local Plan (2018) sets out its Gypsy and Traveller position in Policy 12 ‘Gypsy and Traveller Accommodation’, which sets out the identified need position of 23 pitches between 15 and 2029.

Figure 2.2: Sutton Local Plan Gypsy and Traveller Need 2015 to 2029



2.28 Policy 12 states that:

“The council will safeguard the two existing Gypsy and Traveller sites, The Pastures and Grove Place, Carshalton Road, Woodmansterne, for Gypsy and Traveller accommodation. The council will allocate land for an extension to an existing site at:

- *Land south of The Pastures, Carshalton Road, Woodmansterne (Site Allocation S104)*

“The council has decided to meet the immediate need of 9 pitches only. However the council will undertake a further review of Gypsy and Traveller need and potential sites in the first five years of the plan period to meet any outstanding need over the 15-year period. If it is necessary to allocate additional site(s) to meet this need, a development plan document will be submitted for examination before the end of 2023.”

2.29 Before allocating an extension to the existing site, the council tried to find sites within the urban area but, after two site searches and a consultation with residents, no sites were found to be suitable. The allocated site, originally on land within the the green belt, was selected for a number of reasons:

- It was the preferred option for a significant proportion of the Gypsies and Travellers in Sutton.

- An extension would create an entrance and exit whereas the current configuration has only one access point and constitutes a hazard in the event of a fire due to a lack of an alternative escape route.
- An extension would also enable pavements to be created as currently children playing in the road have no refuge in the event of traffic.
- As the extension is mainly for Gypsies and Travellers living on the existing site, an extension will be less disruptive as both health and education provision is already arranged and running smoothly. In recent years, there has been considerable advancement with Gypsy and Traveller educational attainment with the council and the relevant schools working together to ensure better attendance for longer. In 2014 to 2015 all Gypsy and Traveller pupils in Sutton schools achieved an average attendance of 86%.
- An extension to the existing site would enable the council and SGN to consider supplying mains gas to the site. Residents currently use bottled gas which also has its safety concerns.
- An extensive site search and consultation identified no suitable site within the urban area.
- A second 'greenfield' site search showed an extension to the existing site was the most appropriate option.

Figure 2.3: Sutton Local Plan Site Allocation S104



2.30 In summary, the current Sutton Local Plan and its GTNA evidenced the following needs:

- An overall need for 23 pitches of which 9 pitches were required by 2023.
- No additional need from Travelling Showpeople
- No need identified for transit sites.

SECTION THREE: History and Culture

Introduction

- 3.1 This section provides background information on the Gypsy and Traveller communities within London and the London Borough of Sutton. It includes:
- A short history of the Gypsy and Traveller presence in and around the London Borough of Sutton;
 - An analysis of the different groups of Gypsies and Travellers which are present in London in terms of culture and modern-day requirements; and
 - Finally, the paper draws some conclusions that frame the way in which the needs assessment is carried out.

History of Gypsies and Travellers in and around Sutton¹

- 3.2 Gypsies and Travellers have been a feature of life in and around Sutton for more than 100 years. The 1881 Census counted 231 people living in tents and caravans on Mitcham Common, usually as large, extended family groups.
- 3.3 Gypsies and Travellers were attracted to Sutton for two specific reasons: work and fairs. Traditionally, English Gypsies travelled to the countryside to work on farms, usually earning money by picking soft fruit during the summer and hops, apples and pears in the early autumn. In winter and spring, they earned a living selling hand-made wooden pegs, artificial flowers and other small craft items door-to-door. Gypsies also often offered services, such as repairing pots and pans, sharpening knives, mending chairs and other odd jobs.
- 3.4 However, in the case of Sutton, there was less of a need to travel to the countryside during summer and autumn. Instead, Gypsies were employed harvesting watercress, lavender and other herbs which were grown commercially around Carshalton and Mitcham. Gypsies also bought bunches of lavender from the growers to sell door-to-door.
- 3.5 The local Fair circuit also meant that Gypsies remained in and around Sutton. Fairs in the 19th Century had a much greater commercial focus than they do today and Gypsies made a living selling household wares like pots and pans, baskets, brooms, brushes and woven chairs from stalls. The fairs at Mitcham, Cheam and Epsom Downs (for the Derby), in particular, all attracted large numbers of Gypsies. Some Travellers were showmen and provided entertainment, such as fortune telling, boxing matches, the showing of wild animals and dancing bears. However, with the introduction of mechanical rides during the late 19th Century, the trading aspect began to decline.
- 3.6 Interestingly, the fairs attracted Gypsies from considerable distances. In the 1900s, Spanish gypsies were apparently a familiar sight at Mitcham and Wandsworth Common fairs. Prior to the Second World War, there were also reports of Hungarian Gypsies at the Epsom Downs (Derby) fair, Transylvanian Gypsies and a group of Greek Gypsies who told fortunes at Mitcham Fair.

¹ Abridged from "On Common Ground – Travellers in Merton and Sutton: A History of Travellers in the Community of Merton and Sutton" by Kate Evans

3.7 Irish Travellers are relatively recent arrivals in South London. With a background in Irish metal working, they largely came to the area in the 1960s and 1970s looking for employment. They found homes on waste ground and old building sites, which in many cases (although not Sutton's) gradually became local authority-owned and operated sites.

Gypsies and Travellers within London in the 21st Century

3.8 In terms of the distribution of Gypsies and Travellers in London, there are generally more sites in the outer London boroughs, due to historical reasons and the availability of land. The DCLG Caravan Counts show that there are generally more Gypsies and Travellers living on sites in the west, east and south east of London, with considerably fewer in the north and south west. There are no figures for Gypsies and Travellers living in bricks and mortar accommodation.

3.9 Gypsy and Travellers in London tend to be divided into five groups:

- (i) English Gypsies (also known as Romany Gypsies or Romanichal)
- (ii) Irish Travellers
- (iii) New Travellers (formerly known as New Age Travellers)
- (iv) Eastern European Roma
- (v) Travelling Showpeople

English Gypsies

History and Culture

3.10 Gypsies have their origins in the Indian Subcontinent and began migrating westwards from the 11th Century. The first wave of Gypsies arrived in Britain at the end of the 15th Century. Originally, they were thought to have come from Egypt, hence the name Gypsy.

3.11 Traditionally, Gypsies were employed on a casual labour basis on farms throughout the spring, summer and autumn months. Of particular significance was the hop industry, centred in Kent, which employed thousands of Gypsies both in spring for vine training and for the harvest in early autumn. The winter months were often spent doing casual labour or selling goods or services door to door. However, the mechanisation of agriculture in the 1960s and the 1960 Caravan Sites and Control of Development Act disrupted this way of life. With work and travelling opportunities limited, Gypsies started to move to residential council sites in London. Nowadays, the typical trades tend to be scrap metal dealing, horse dealing, tree surgery and landscaping, tarmacing and hawking.

3.12 Originally, Gypsies would travel on foot or with light horse-drawn carts and would sleep in Bedner tents, made of hazel branches and covered with canvas or tarpaulin. However, in the mid to late 19th Century, Gypsies started using horse-drawn wagons, "Vardos" in Romany, which were brightly decorated and romantically linked with the Gypsy way of life. Nowadays, Gypsies tend to live in static caravans or chalets but they may also have a trailer in order to undertake some travelling in the summer months.

3.13 In terms of education, the situation is better than it was previously. Most younger English Gypsies are literate. However, overall attainment remains low. Many families

opt for home schooling when a girl reaches the ages of 12 or 13 and boys' attendance at school can be sporadic in secondary school.

- 3.14 One of the features of Gypsy sites is that there are usually no toilets or showers inside caravans because, in Gypsy culture, this is considered unclean or "mochadi". Most sites have separate utility blocks with toilets, sinks and electric showers. Most Gypsies will also not do their laundry inside, especially not underwear, and consequently many utility blocks also have washing machines. In the days of horse-drawn wagons or Vardos, Gypsies would do their laundry in a river, being careful to wash upper body garments upstream from underwear and lower body garments, and personal bathing would take place much further downstream. In some modern trailers, a double wall separates the living areas from the toilet and shower.

Requirements

- 3.15 Therefore, in terms of new pitches, the requirements for English Gypsies include:
- Space for storage related to work activities;
 - Parking place for work-related vehicles;
 - Space for touring trailer; and,
 - Separate utility block for toilets, showers and washing machines and food preparation areas.

Irish Travellers

History and Culture

- 3.16 The origins of Irish Travellers as a group are unclear. It was once widely believed that Irish Travellers were descended from landowners or labourers who were made homeless by Oliver Cromwell's military campaign in Ireland and in the 1840s famine. However, it is claimed that there is evidence of nomadic groups in Ireland in the 5th Century.
- 3.17 In contrast to English Gypsies, Irish Traveller family groups tend to be much larger than the English Gypsy groups, which are only slightly bigger than the family groups of the settled community. Indeed, Irish Travellers may have the highest birth rate of any group within Europe. In addition, Irish Travellers often maintain close contact or ties with other Irish Traveller groups across the country. Other contrasts relate to travelling patterns, while they also tend to travel in the summer months, the routes are different to English Gypsies. Irish Travellers also tend to marry at a younger age, are usually devout Roman Catholics and they may speak dialects of Shelta (an Irish Gaelic-based language with varying degrees of Anglicisation). The educational achievement of Irish Traveller school children and attendance at school is similar to English Gypsy school children.
- 3.18 Traditionally, Irish Travellers were involved with metal working, such as tinsmithing, or animal husbandry and dealing. While these trades are in less demand today due to the mechanisation of agriculture and consumer habits, scrap metal recycling is still a major source of income and it is not unusual for horses and dogs to be kept on or near a pitch.
- 3.19 There is a wide disparity in income between different Irish Traveller families, which makes generalisations difficult and also means that some Irish Traveller may be landowners and rent pitches to other families, as is the case in Sutton.

3.20 Changes in rural employment patterns have meant that many Irish Travellers have migrated to major cities and live in pitches on the periphery but it is also believed that they are also more likely to live in housing than English Gypsies.

Requirements

3.21 Therefore, in terms of new pitches, the requirements of Irish Travellers include:

- Opportunity to purchase their own land;
- Space for storage related to work activities;
- Parking place for work-related vehicles;
- Space for touring trailer;
- Space for livestock and,
- Separate utility block.

New Travellers

History and Culture

3.22 New Travellers is a term used to describe people who choose a nomadic lifestyle through a movement that originated in the free festivals of the 1970s, such as the Windsor Free Festival and the early Glastonbury Festivals.

3.23 Their transport and homes consist of vans, lorries, buses and caravans converted into mobile homes. They also make use of tents, tipis and yurts. In terms of income, many do seasonal or temporary work on farms, on building sites, in factories or in pubs. Others work as self-employed mechanics, electricians, and plumbers or make money selling scrap, running stalls at markets and car boot sales. Festivals during the summer also present opportunities for New Travellers to make money through offering entertainment, services and goods to festival goers. Within the New Traveller community, there is a high level of mutual aid, including the sharing of childcare and vehicle maintenance. Most New Traveller children are home schooled from their early years.

3.24 New Travellers tend to stay on unauthorised sites, particularly in Wales and south-west England, and are often evicted. Consequently, they are a frequently moving group. There is a New Traveller population in London and they tend to reside in or by disused factories or warehouse yards.

Requirements

3.25 Since there is very little vacant industrial land within the London Borough of Sutton, it is not believed there is a New Traveller community within the borough and so there is no requirement for any New Traveller accommodation.

Eastern European Roma

History and Culture

3.26 Although the description 'Roma' is used by some to refer to a large diverse group of travellers with broadly similar ethnic origins, including English Gypsies, in the UK it is generally used to refer to Eastern European Roma. The Roma are culturally distinct from English Gypsies in a variety of ways, although they retain some cultural and linguistic links.

- 3.27 In Eastern Europe, the Roma often live in depressed squatter communities with very high unemployment and only a very few are fully integrated into society. Only a small fraction of Roma children graduate from secondary schools, although under some of the Communist regimes, they were forced to attend school and provided with textbooks and compulsory uniform. In many cases, families were also forcibly settled by the authorities in either separate blocks of flats or within blocks of flats with the settled community.
- 3.28 The majority of Roma have arrived in the UK since the 1990s, following the fall of communism. However, the forcible settlement policies of the communist regimes have meant that the majority of Roma no longer have an interest in travelling or living on pitches. Instead, in interviews, they have generally stated that they would prefer to live in housing.
- 3.29 The number of Roma in the UK is unknown. There are Roma support groups based in East London, suggesting there is a population concentration in that area but there are no known Eastern European Roma within the London Borough of Sutton.

Requirements

- 3.30 Since there are no known Eastern European Roma within the London Borough of Sutton, there is no requirement for any East European Roma accommodation and their current lifestyle suggests their culture has no special accommodation requirements.

Travelling Showpeople

History and Culture

- 3.31 In contrast to the other groups covered in this document, Travelling Showpeople are not a distinct ethnic group but self-employed business people, who travel the country, often with their families, holding fairs. Although their work involves a large degree of travelling, there is a requirement for permanent bases for the storage of equipment and residential purposes. These bases are most used in the winter when many Travelling Showpeople return with their caravans and are referred to as 'winter quarters'.
- 3.32 Most Travelling Showpeople are members of the Showmen's Guild of Great Britain and are required by the Guild to follow a strict code of practice regulating the use of their sites. Membership of the Guild exempts Travelling Showpeople from the site licensing requirements of the 1960 Caravan Sites and Control of Development Act both for summer travelling and winter quarters.
- 3.33 The traditional pattern of Travelling Showpeople's movements is changing and the community has generally become more settled. This is a result of the decline of the traditional fairs which has meant Travelling Showpeople are diversifying into other activities which involve more localised travelling and so the base is being used for longer during the year.
- 3.34 A further change in lifestyle is that Travelling Showpeople's winter quarters are increasingly being occupied all year round. Older family members tend to stay on the site for most of the year and children are also kept on site all year for uninterrupted education purposes.
- 3.35 The winter quarters typically comprise an area for accommodation, usually caravans or chalets, and an area where vehicles and fairground equipment can be stored,

repaired and tested. Collectively the areas are termed a plot. Those showmen involved with circuses, as opposed to funfairs, often have additional requirements for the keeping and exercise of animals.

3.36 Within London, there is a large Travelling Showpeople site on the Hounslow/Ealing border and smaller significant sites within Hillingdon and Bromley. The London Borough of Sutton currently has no Travelling Showpeople sites and relatively few visiting fairs, which can include:

- Smith's Funfair at Carshalton Park in May/June;
- David Guyatt's Funfair at Rosehill Park West in May/June;
- Zippo's Circus at Beddington Park in June; and,
- David Guyatt's Funfair at Rosehill Park West in August.

Requirements

3.37 Since there are no Travelling Showpeople sites within the London Borough of Sutton, there is no accommodation requirement to provide for this group.

Conclusions

3.38 Gypsies and Travellers cannot be considered a homogenous group: there are different types of Gypsies and Travellers with different histories and cultures which lead to different requirements in terms of accommodation.

3.39 Of the five principal groups of Gypsies and Travellers in London, only two are present in the London Borough of Sutton: English Gypsies and Irish Travellers. English Gypsies generally have special accommodation requirements as a result of their employment, hygiene considerations and travelling habits. Irish Travellers may have the additional requirement of space to keep livestock.

SECTION FOUR: Methodology

Introduction

4.1 The methodology used is set out in detail in its report.

Summary of Approach

4.2 Accommodation needs are calculated over two five-year periods:

- 2022/23-2026/27: 1 April 2022 to 31 March 2027
- 2027/28-2031/32: 1 April 2027 to 31 March 2032

4.3 Calculations are based on a model suggested in DCLG (2007) guidance. The basic premise of the model is that, by comparing current and projected accommodation provision with gross current and projected accommodation need, it is possible to calculate net current and projected accommodation need.

4.4 The approach takes into account the government changes to the definition that were published December 2023, in response to the Court of Appeal judgement in the case of Smith v SSLUHC & Others (October 2022).

4.5 The GTANA accommodation needs figures are based on need rather than preference or demand. The GTANA determines that there is accommodation need if, for example:

- there is evidence that households living in bricks and mortar accommodation are overcrowded (after applying the ONS (2021) 'bedroom standard')
- there is evidence of households 'hidden' or 'doubled up' on pitches or plots
- the household of a Gypsy or Traveller aged 16 years or over indicate that this individual will require their own accommodation within the next five years (This is typically because the household anticipates the individual will form a new household.)
- Gypsy and Traveller households residing in bricks and mortar accommodation display a 'cultural preference' for residing on a pitch.

4.6 The outcome of the assessment is set out in the GTANA and summarised in Section 5 of this document.

SECTION FIVE: Accommodation Need

Introduction

- 5.1** This section sets out the accommodation needs for different groups within the gypsy and traveller community. This takes into account those in the community that are currently living in bricks and mortar but have a cultural preference to a traditional pitch.

Gypsies and Travellers Accommodation Need

- 5.2** Table 5.1 below sets out the need for gypsy and traveller pitches, both under the PPTS definition and the cultural definition for the five year period to 2026-27.

Assessing need in the first five-year period, 2022/23 to 2026/27

- 5.3** The accommodation needs relating to the first five-year period (2022/23 to 2026/27) are based on the results of household surveys undertaken in each borough. Survey responses determine the number of households from each cohort surveyed who need to move due to, for example, overcrowding, or to accommodate newly forming households.
- 5.4** Survey findings from households in bricks and mortar are extrapolated to the whole population. For instance, analysis of the survey findings determined that 19% of Roma households in bricks and mortar experience overcrowding. This proportion is then extrapolated to the whole population of Roma households residing in London, on a borough basis, to determine their accommodation needs. This type of extrapolation is not needed for the findings of surveys of households living on sites or yards, because of the high response rate.

Assessing need in the second five-year period, 2027/28 to 2031/32

- 5.5** Accommodation needs relating to the second five-year period (2027/28 to 2031/32) are based on population projections derived from an understanding of the whole GRTTS population across London as a whole. This is because, in some boroughs, the small size of the GRTTS population means that it is not possible to accurately predict population growth at local level.
- 5.6** Accommodation needs for the second five-year period are calculated by applying a population growth figure, based on analysis of factors derived from the household surveys conducted for the 2023 GTANA. These factors include current population numbers, the average number of children per household, and household formation rates. Survey responses indicate an annual household growth rate of 3% per annum (compound), equating to a five-year rate of 15.9%. They also indicate a mortality rate of 2.3% over each five-year period. Combining these two figures yields a net population growth rate of 13.6%. Basing population growth figures on survey responses leads to a robust and reliable population projection for the second five-year period.
- 5.7** The need for residential pitches in the study area is assessed according to a 15-step process, based on the model suggested in DCLG (2007) guidance and using data derived from surveys of Gypsies and Travellers living on pitches and in bricks and mortar. The results of this are shown in Table 5.1 below. Table 5.2 presents the level of need for the 10-year period of the GTANA. This needs

assessment provides two accommodation needs figures: first, based on cultural identity ('cultural' column); and second, based on PPTS 2023 ('PPTS' column).

Table 5.1: Summary of Need for Pitches for Gypsies and Travellers 2022/23-2026/27

Assessment Stage	Cultural	PPTS
1) Current occupied permanent residential site pitches	32	32
<i>Additional accommodation supply</i>		
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality	1	1
4) Net number of households expected to leave the area (linked to step 13)	1	1
5) Number of households expected to move into housing in next 5 years	1	1
6) Residential pitches planned to be built or to be brought back into use	8	8
Total additional supply	11	11
<i>Additional accommodation need</i>		
7) Needing permanent permission from temporary sites	0	0
8) Households seeking a pitch in the area	0	0
9) Households on transit pitches requiring residential pitches in the area	0	0
10) Households on unauthorised encampments requiring residential pitches	0	0
11) Households on unauthorised developments requiring residential pitches	0	0
12) Households currently overcrowded (including concealed or 'doubling up')	6	6
13) Households expected to arrive from elsewhere (linked to step 4)	1	1
14) Newly forming households	8	8
15) Households in bricks and mortar with cultural preference need for a pitch	5	4
Total need	20	19
<i>Balance of need and supply</i>		
Total additional accommodation required	9	8

5.8 Table 5.2 shows the combined need for pitches for the two five year period using the PPTS definition and the wider cultural definition. However, it should be noted that the Cultural definition also includes the PPTS definition i.e. this should not be added together as this would be double counting. In short, the Council considers it should be planning for the cultural definition need, which equates to 15 pitches from 2022 to 2032.

Table 5.2: Summary of need for pitches for Gypsies and Travellers 2022/23-2031/32

Definition of need	2022/23-2026/27	2027/28-2031/32	Total
Cultural	9	6	15
PPTS	8	6	14

Need for plots for Travelling Showpeople

5.9 As there are no known plots (either authorised or unauthorised) within the borough, and no evidence of need for plots for Travelling Showpeople, there is no identified need for Travelling Showpeople plots.

Need for bricks and mortar homes for Roma

5.10 The need for bricks and mortar homes for Roma in the study area is assessed according to a seven-step process, based on the model suggested in DCLG (2007) guidance, using data derived from the fieldwork undertaken for this assessment. The results of this calculation for the first five-year period are shown in Table 5.3 below. Table 5.4 presents the level of need for the 10-year period.

Table 5.3: Summary of need for bricks and mortar homes for Roma 2022/23-2026/27

Category	Number
1) Current homes occupied by Roma households	126
<i>Additional accommodation supply</i>	
2) Number of existing dwellings expected to become vacant through mortality	4
3) Number of households in housing expected to move out of London	0
4) Dwellings vacated by movement within the stock	24
Total additional supply	28
<i>Additional accommodation need</i>	
5) Households in housing seeking to move	24
6) Households in overcrowded housing	23
7) Newly forming households	25
Total need	72
<i>Balance of need and supply</i>	
Total additional accommodation required	45

Table 5.4: Summary of need for bricks and mortar homes for Roma 2022/23-2031/32

2022/23-2026/27	2027/28- 2031/32	2022/23-2031/32
45	18	62

Need for bricks and mortar homes for Gypsies and Travellers

5.11 The need for bricks and mortar homes for Gypsies and Travellers in the study area is assessed according to a 10-step process, based on the model suggested in DCLG (2007) guidance and using data derived from the survey. The results of this calculation for the first five-year period are shown in Table 5.5 below, and Table 5.6 presents the level of need for the 10-year period of the GTANA.

Table 5.5: Need for bricks and mortar homes for Gypsies and Travellers 2022/23-2026/27

Category	Number
1) Current occupied dwellings	26
<i>Additional accommodation supply</i>	
2) Number of existing dwellings expected to become vacant through mortality	1
3) Dwellings vacated by those with cultural preference need for a pitch	5
4) Number of households in housing expected to move out of London	0
5) Dwellings vacated by movement within the stock	8
Total additional supply	14
<i>Additional accommodation need</i>	
6. Households in housing without cultural preference seeking to move	8
7) Households on unauthorised pitches seeking housing in the area	0
8) Households in overcrowded housing without cultural preference	4
9) Newly forming households	9
10) Households moving into housing from sites	1
Total need	22
<i>Balance of need and supply</i>	
Total additional accommodation required	8

Table 10: Need for bricks and mortar homes for Gypsies and Travellers 2022/23-2031/32

2022/23-2026/27	2027/28- 2031/32	2022/23-2031/32
8	5	13

SECTION SIX: Site Search

Introduction

6.1 This section seeks to identify the most suitable sites for future Gypsy and Traveller pitch provision. It explains the site selection process from the compilation of a long list, through the evaluation of a long list, the compilation of a short list and the evaluation of a shortlist, to the production of a small set of preferred sites. The appendices of this evidence base paper set out the lists in full and their evaluation.

Compilation of a Long List

6.2 The competition for developable land within the London Borough of Sutton is strong. The borough has received an increased housing target from The Mayor of London in 2015. The annual net new dwelling target is now 363 per year. The borough is also classified by The Mayor as a “borough of restricted transfer” for industrial land converting to other uses as the demand from industry for land is so strong. In addition, within the borough boundary, there are 616ha of Green Belt, 512ha of Metropolitan Open Land, 207ha of Conservation Areas and 208ha of Areas of Special Local Character. Consequently, finding suitable sites for any use is difficult.

6.3 The start of the site search involved the compilation of a long list. Sites for inclusion on the long list came from the following sources:

- Allocated sites within the Council’s adopted planning documents. These were included to ascertain whether the allocations for the sites were still likely to come forward according to the uses in which they were allocated;
- Windfall sites. These were sites which Council officers knew were available for redevelopment or were likely to be available for redevelopment in the near future. It also included any disposals of the Council’s estate;
- Other sites identified by the Council.
- Green Belt. The Borough’s two areas of Green Belt, Woodcote and Cuddington.
- Metropolitan Open Land. Metropolitan Open Land has the equivalent status as Green Belt but is within the urban area. The large area of Metropolitan Open Land, Beddington Farmlands, was divided up into 16 different parcels;
- The Council’s designated Public Open Space;
- The Council’s designated Urban Green Space, which are small areas
- of open space to which the public has restricted access, such as sports clubs; and
- The Council’s allotments.

6.4 At this stage, sites were included regardless of their ownership. In other words, both privately and publicly owned sites were included.

Evaluation of the Long List

6.5 Having compiled the long list, the sites on the long list were then evaluated according to a set of criteria. The criteria used was mainly derived from Policy 12 ‘Gypsy and Traveller Accommodation’ in the adopted Local Plan (2018), which is reproduced below, and other relevant planning considerations:

Policy 12: Gypsy and Traveller Accommodation

Planning permission for further Gypsy and Traveller sites will only be permitted when a site satisfies the following criteria:

- a) The site has safe access to and from the road network, and it has adequate provision for parking, turning, servicing and emergency vehicle access.
- b) The application will not have an unduly adverse impact on the local environment, the character of the area and the amenities of both local residents and the future occupiers of the site, including the potential for noise pollution, air pollution or traffic movements and other activities likely to be taking place within or in the vicinity of the site.
- c) The site has or will have a supply of essential services, such as mains gas and electricity, water, sewerage and drainage and waste disposal.
- d) The site is situated within a reasonable distance of local shops, services and community facilities, in particular schools and health services, and is accessible by public transport.
- e) The site is not located in an area at high risk of flooding.
- f) The layout of the site, its associated facilities and landscaping will be designed to a high standard including pitches, hardstandings, amenity blocks, amenity and play spaces and boundary treatments.

6.6 There were two criteria for the site search which were considered absolute criteria (ie if the site did not meet these criteria, the site was immediately excluded). These criteria are set out in Table 6.1:

Table 6.1: Absolute Criteria at the Long List Stage

Criterion	Reason for Criterion
Minimum size threshold of 0.25ha	To provide a viable developable area
Available to Council now	To ensure the site can be delivered

6.7 There were seven other criteria which were not considered absolute but were considered preferable to be met. These criteria are set out in Table 6.2:

Table 6.2: Preferable at the Long List Stage

Criterion	Reason for Criterion
On brownfield land	To adhere to good planning practice
No new build since 2004	To identify land likely to be recycled
Safe road access	To meet part (a) of Local Plan Policy 12
Not within a Conservation Area or Area of Special Local Character	To meet part (b) of Local Plan Policy 12
Essential services likely to be available	To meet part (c) of Local Plan Policy 12
Not more than 1km from a local, district or metropolitan centre	To meet part (d) of Local Plan Policy 12
Not in Flood Risk Zone 3	To meet part (e) of Local Plan Policy 12

6.8 The results of the long list evaluation are set out in Appendix 1. If a site failed either of the absolute criteria, it was immediately excluded and went to the bottom of the list. The preferred criteria, for which the answers were only either “yes” or “no”, were then totalled to provide a score of suitability. The maximum score for the preferred criteria was 7.

6.9 Sites passing the absolute criteria and then scoring 7 or 6 in the preferred criteria were then evaluated to ascertain if they were practical to include in a shortlist. Sites were discounted, if:

- It was an allocated site and the site was still needed for its allocation;
- Its current use was still required;
- It was an allotment with a demand for places;
- It was high-functioning Metropolitan Open Land, ie it contributed significantly to the openness of the Metropolitan Open Land and added to the “green” feel of the Borough; or
- If the site was designated open space.

Compilation of a Short List

6.10 At the end of the long list evaluation, 9 sites were put forward as a shortlist.

- Open Land, Chaucer Gardens, Sutton
- Land at Hannibal Way, Beddington
- Land at Kimpton Park Way and Oldfields Road, Sutton
- Land South of the Pastures, Woodcote Road
- Land north east of Durand Close, Carshalton
- Shotfield Car Park, Shotfield Road, Wallington
- Russetings Registry Office, Worcester Road, Sutton
- Woodcote Green Belt (Field to east of current G&T site)
- Woodcote Green Belt (Field surrounding current G&T site)

Evaluation of a Short List

6.11 The 9 sites on the shortlist were then further analysed for suitability. The criteria from the long list were taken forward and given a score of 10 for each criterion met or 0 for a criterion that was not met. Furthermore, additional planning criteria were added at this stage to further refine the site selection process. The additional criteria each had a maximum score of 10. These additional criteria are shown in Table 6.3.

Table 6.3: Additional Planning Criteria for the Shortlist

Criterion	Reason for Criterion
Not incongruous in an area of suburban character.	Not incongruous – 10 Incongruous – 0
Less than 500m from a local or town centre.	Less than 500m – 10 More than 500m – 0
Not close to another Gypsy and Traveller Site.	Not close – 10 Close – 0
Less than 500m from a primary school.	Less than 500m – 10 More than 500m – 0
Not on contaminated land	Not on contaminated land – 10 On contaminated land – 0
No further flooding issues	Consideration of: a) (Fluvial) Flood Risk Zone 2 b) Surface Water Critical Drainage Areas c) Balancing Ponds None of the three present on site – 10 One of the three present on site – 5 Two or more of the three present on site – 0
Not within or adjacent to a Site of Importance for Nature Conservation (SINC).	Not within or adjacent to a SINC – 10 Adjacent to a SINC – 5 Within a SINC – 0
None or poor quality trees within the site.	No trees – 10 Poor quality trees – 5 Good quality trees – 0

6.12 Besides additional planning criteria, the shortlisted sites were also assessed for developability as a site may be suitable for a Gypsy and Traveller site but, if there is no prospect of the site coming forward, then it is not deliverable. Each developability criteria was given a maximum score of 10. These developability criteria are shown in Table 6.4.

Table 6.4: Developability Criteria for the Shortlist

Criterion	Scoring
The existing use does not have to be reprovided/ is not needed	Does not have to be reprovided/is not needed – 10 Has to be reprovided/needed – 0
The site can be easily screened on all sides	Can be screened on all sides – 10 Can be screened on 1, 2 or 3 sides- 5 Cannot be screened on any sides – 0
The site entrance is satisfactory	From a Borough Distributor Road – 10 From a non-residential other road – 5 Through a residential area, from the Strategic Road Network or a London Distributor Road – 0
The site is close to the Strategic Road Network	Less than 500m – 10 Between 500m and 1km – 5 1km or more – 0
The site is safe and suitable for children	Is safe and suitable for children – 10 Is not safe and suitable for children – 0
The site is still available (ie there are no ownership constraints to development)	The site is still available – 10 The site is no longer available – 0

6.13 The detailed results of this evaluation are shown in Appendix 2 and a summary is shown in Table 6.5.

Table 6.5: Scoring List of the Short List

	Site	Score
1st	Land at Hannibal Way, Beddington	190
2nd	Land South of the Pastures, Woodcote Road	165
-	Woodcote Green Belt (Field to east of current G&T site)	165
-	Woodcote Green Belt (Field surrounding current G&T site)	165
5th	Russetings Registry Office, Worcester Road, Sutton	150
-	Land at Kimpton Park Way and Oldfields Road, Sutton	150
6th	Open Land, Chaucer Gardens, Sutton	145

Further Consideration of the Short List

6.14 Following the assessment, the sites were subject to further consideration which resulted in a further refinement of the assessment.

Table 6.6 - Short Listed Sites Excluded

Site	Reasons for Exclusion
Land at Kimpton Park Way and Oldfields Road, Sutton	This site was previously considered during the current Local Plan (2018) preparation but was withdrawn due to overwhelming objections and the lack of ability to “promote peaceful and integrated co-existence between the site and the local community”. There were also a number of access / highways issues with the sites alongside groundwater flooding issues. This issue still exists and the site is now being progressed as a site for Council led housing, which will be able to better address the above issues.
Open Land, Chaucer Gardens, Sutton	Site is located on the edge of the town centre where there is a deficiency in open space. In addition, the site has both fluvial and surface water flood risk as the Pyl Brook runs along the boundary of the site.

Table 6.6 - Short Listed Sites Pros and Cons

Site	Pros	Cons
Land at Hannibal Way, Beddington	<ul style="list-style-type: none"> • Small area of land with no planning designations. • Will impact on relatively few residential properties, so more compatible than other sites. • Access to shops and services can be made on foot/cycle. • Brownfield land 	<ul style="list-style-type: none"> • Could impact on adjacent uses. • Current changing rooms would need to be relocated • New access would be required to the health club. • The area has previously been subject to a number of unauthorised Gypsy and Traveller encampments • Existing lease for the site
Land South of the Pastures, Woodcote Road	<ul style="list-style-type: none"> • No impact on nearby residential areas. • Located in an area that has successfully accommodated pitch provision. • No existing uses. 	<ul style="list-style-type: none"> • Green Belt • Site of interest for Nature Conservation. • Some distance from shops and services.
Woodcote Green Belt (Field to east of current G&T site)	<ul style="list-style-type: none"> • No impact on nearby residential areas. • Located in an area that has successfully accommodated pitch provision. • No existing uses. 	<ul style="list-style-type: none"> • Green Belt • Site of interest for Nature Conservation. • Some distance from shops and services.
Woodcote Green Belt (Field surrounding current G&T site)	<ul style="list-style-type: none"> • No impact on nearby residential areas. • Located in an area that has successfully accommodated pitch provision. • No existing uses. 	<ul style="list-style-type: none"> • Green Belt • Site of interest for Nature Conservation. • Some distance from shops and services.

Appendix 1 - Site Search Long List

[Need to add table but link to Google Sheet Version]

<https://docs.google.com/spreadsheets/d/1YOjQZJ0YOhDi4YZHVC-07bMe7Y03T2Nm/edit?rtpof=true#gid=1956210179>

Appendix 2 - Site Search Short List

[Need to add table but link to Google Sheet Version]

https://docs.google.com/spreadsheets/d/1_ZotrGL25jsr5ELdvtDr1N_2VOARpR2/edit#gid=956884055

Annex 1: Long List of Potential Sites

Site	Site Allocation	Source	Size Criteria	Available to Council now	Brownfield	No build since 2004	Road access safe	Not in or adjacent to CA or ASLC	Services present	1km from centre	Not in Flood Risk Zone 3	Total	To shortlist?
London Cancer Hub	LCH1	Allocation	22.57	1	1	1	1	1	1	1	1	7	Needed for allocation
Secombe Theatre Site, Cheam Road, Sutton	STC10	Allocation	0.28	1	1	1	1	1	1	1	1	7	Needed for allocation
Council Offices, Denmark Road, Carshalton	S52	Allocation	0.40	1	1	1	1	1	1	1	1	7	Needed for allocation
Council Car Park, Denmark Road, Carshalton	S53	Allocation	0.40	1	1	1	1	1	1	1	1	7	Needed for allocation
Russettings	-	Windfall	0.25	1	1	1	1	1	1	1	1	7	Site is locally listed
Robin Hood School, Throwley Way and shed	-	Windfall	0.87	1	1	1	1	1	1	1	1	7	Needed for current use
Land to the rear of Chaucer Gardens	-	Windfall	0.28	1	1	1	1	1	1	1	1	7	YES
Gibson Road Car Park	STC31	Allocation	0.67	1	1	1	1	1	1	1	1	7	Needed for allocation
Houses adjacent to Manor Park	STC38	Allocation	0.52	1	1	1	1	1	1	1	1	7	Needed for allocation
Times Square Car Park, Throwley Way	STC41	Allocation	0.74	1	1	1	1	1	1	1	1	7	Needed for allocation
Shotfield Car Park, Shotfield	Sx23	Allocation	0.40	1	1	1	1	1	1	1	1	7	Needed for allocation
Resource Centre, 667-671 London Road	Sx38	Allocation	0.37	1	1	1	1	1	1	1	1	7	Needed for allocation
Council Car Park, Denmark Road, Carshalton	Sx53	Allocation	0.46	1	1	1	1	1	1	1	1	7	Needed for allocation
Oakleigh, Benhill Avenue	-	Windfall	0.45	1	1	1	0	1	1	1	1	6	Built Out
Land adjacent to Tescos, Willow Walk (includes balancing ponds)	-	Windfall	0.52	1	1	1	1	1	1	1	0	6	Flood Zone 3
Civic Centre Site, St Nicholas Way, Sutton	STC9	Allocation	0.90	1	1	1	1	1	0	1	1	6	Needed for allocation
Sutton West Centre, Robin Hood Lane, Sutton	STC4	Allocation	1.00	1	1	1	1	1	0	1	1	6	Needed for allocation
Westmead Road	-	Allotments	3.40	1	1	0	1	1	1	1	1	6	Site in demand
Wandle Road	-	Allotments	0.55	1	1	0	1	1	1	1	1	6	Site in demand
Stanley Road	-	Allotments	3.90	1	1	0	1	1	1	1	1	6	Site in demand
Roundshaw	-	Allotments	1.90	1	1	0	1	1	1	1	1	6	Site in demand
Ridge Road	-	Allotments	0.90	1	1	0	1	1	1	1	1	6	Site in demand
Perrett's Field	-	Allotments	0.80	1	1	0	1	1	1	1	1	6	Site in demand
Mill Green	-	Allotments	0.45	1	1	0	1	1	1	1	1	6	Site in demand
Lavender Road	-	Allotments	0.30	1	1	0	1	1	1	1	1	6	Site in demand
Greenshaw Farm	-	Allotments	4.30	1	1	0	1	1	1	1	1	6	Site in demand
Green Wrythe Lane	-	Allotments	4.00	1	1	0	1	1	1	1	1	6	Site in demand
Gander Green Lane	-	Allotments	3.50	1	1	0	1	1	1	1	1	6	Site in demand
Fryston Avenue	-	Allotments	0.30	1	1	0	1	1	1	1	1	6	Site in demand
Duke Street	-	Allotments	0.90	1	1	0	1	1	1	1	1	6	Site in demand
Culvers Avenue	-	Allotments	0.40	1	1	0	1	1	1	1	1	6	Site in demand
Chaucer Road	-	Allotments	0.60	1	1	0	1	1	1	1	1	6	Site in demand
Central Road	-	Allotments	0.30	1	1	0	1	1	1	1	1	6	Site in demand
Bushey Lane	-	Allotments	0.50	1	1	0	1	1	1	1	1	6	Site in demand
Benhill	-	Allotments	2.65	1	1	0	1	1	1	1	1	6	Site in demand
Belmont	-	Allotments	2.20	1	1	0	1	1	1	1	1	6	Site in demand
Woodcote Green Belt Part 20 (Woodcote Park Golf Course - Northern Part)	-	GB	28.27	1	1	0	1	1	1	1	1	6	High functioning GB
Woodcote Green Belt Part 14 (Land north of Longlands Avenue)	-	GB	1.12	1	1	0	1	1	1	1	1	6	High functioning GB
Wilson's School Playing Fields	-	MOL	6.55	1	1	0	1	1	1	1	1	6	High functioning MOL
Thomas Wall Park and Playground	-	MOL	6.75	1	1	0	1	1	1	1	1	6	High functioning MOL
Sutton Common Recreation Ground - Southern Part	-	MOL	4.65	1	1	0	1	1	1	1	1	6	High functioning MOL
Sutton Common Recreation Ground - Northern Part	-	MOL	1.92	1	1	0	1	1	1	1	1	6	High functioning MOL
Sutton Cemetery	-	MOL	8.58	1	1	0	1	1	1	1	1	6	High functioning MOL
St Helier Open Space - South West of Middleton Road	-	MOL	3.39	1	1	0	1	1	1	1	1	6	High functioning MOL
St Elphege's Primary School playing field	-	MOL	0.80	1	1	0	1	1	1	1	1	6	High functioning MOL
Roundshaw Downs - Allotments and surrounding area	-	MOL	5.38	1	1	0	1	1	1	1	1	6	High functioning MOL
Rosehill Tennis Club (outdoor facilities)	-	MOL	2.90	1	1	0	1	1	1	1	1	6	Planning permission for a school
Rosehill Recreation Ground - West of the Tennis Courts	-	MOL	0.47	1	1	0	1	1	1	1	1	6	High functioning MOL
Rosehill Recreation Ground - Northern Part	-	MOL	10.69	1	1	0	1	1	1	1	1	6	High functioning MOL
Rosehill Recreation Ground - East of the Tennis Centre	-	MOL	1.80	1	1	0	1	1	1	1	1	6	High functioning MOL
Rosehill Park East, West and Greenshaw Wood	-	MOL	12.66	1	1	0	1	1	1	1	1	6	High functioning MOL
Reigate Avenue Recreation Ground & Glenthorne Playing Fields	-	MOL	6.16	1	1	0	1	1	1	1	1	6	High functioning MOL
Mill Green - North Eastern Side	-	MOL	3.87	1	1	0	1	1	1	1	1	6	High functioning MOL
Land west of Roundshaw Estate	-	MOL	8.57	1	1	0	1	1	1	1	1	6	High functioning MOL
Land rear of Kimpton Industrial Estate	-	MOL	0.26	1	1	0	1	1	1	1	1	6	High functioning MOL / Open Space
Beddington Farmlands Part 3 (Days Aggregate Site)	-	MOL	13.99	1	1	0	1	1	1	1	1	6	High functioning MOL
Yardley Recreation Ground, off Wordsworth Drive, Cheam	-	POS	0.60	1	1	0	1	1	1	1	1	6	Open Space
Wilderness Island, land opp River Gdns and adj to railway, River Gdns	-	POS	1.50	1	1	0	1	1	1	1	1	6	Open Space
The Green, High Street, Sutton (two parts)	-	POS	1.00	1	1	0	1	1	1	1	1	6	Open Space
Stanley Park Recreation Ground	-	POS	4.00	1	1	0	1	1	1	1	1	6	Open Space
Seear's Park and Perrett's Field, St Dunstan's Hill, Cheam	-	POS	9.00	1	1	0	1	1	1	1	1	6	Open Space
Rushey Park/ Fellowes Park, off Wrythe Lane, Carshalton	-	POS	1.60	1	1	0	1	1	1	1	1	6	Open Space
Royston Park	-	POS	3.30	1	1	0	1	1	1	1	1	6	Open Space
Radcliffe Gardens and Woodland, Carshalton Beeches	-	POS	1.20	1	1	0	1	1	1	1	1	6	Open Space
Old Belmont Hospital Meadow	-	POS	0.70	1	1	0	1	1	1	1	1	6	Open Space
Manor Park, Throwley Way, Sutton	-	POS	2.30	1	1	0	1	1	1	1	1	6	Open Space
Limes Avenue Recreation Ground, Carshalton	-	POS	1.20	1	1	0	1	1	1	1	1	6	Open Space
Hamilton Avenue Recreation Ground, Kimpton Road, Cheam	-	POS	2.20	1	1	0	1	1	1	1	1	6	Open Space

Annex 1: Long List of Potential Sites

Elm Road, London Road, Hackbridge	-	POS	0.40	1	1	0	1	1	1	1	1	1	6	Open Space
Dale Park Recreation Ground, Dale Park Avenue, Carshalton	-	POS	1.50	1	1	0	1	1	1	1	1	1	6	Open Space
Courtney Crescent, Carshalton Beeches	-	POS	0.40	1	1	0	1	1	1	1	1	1	6	Open Space
Corrigan Avenue Recreation Ground, Corrigan Avenue, Coulsdon	-	POS	6.20	1	1	0	1	1	1	1	1	1	6	Open Space
Benhill Recreation Ground, Lavender Road, Sutton	-	POS	2.40	1	1	0	1	1	1	1	1	1	6	Open Space
Collingwood Recreation Ground	-	POS	8.80	1	1	0	1	1	1	1	1	1	6	Open Space
Fairlands Park and LRT Sports Ground, London Road, Cheam	-	POS/Windf	3.80	1	1	1	1	1	0	1	1	1	6	Open Space
Sutton Churches Tennis Club, off Gander Green Lane, Sutton	-	UGS	0.60	1	1	0	1	1	1	1	1	1	6	Open Space
St. Philip's Churchyard and Cuddington Cemetery	-	UGS	1.00	1	1	0	1	1	1	1	1	1	6	Open Space
Southern Railway Sports Club, Mollison Drive	-	UGS	0.31	1	1	0	1	1	1	1	1	1	6	Open Space
Downs Tennis Club, Holland Avenue, Belmont	-	UGS	0.40	1	1	0	1	1	1	1	1	1	6	Open Space
Croydon Gas Sports Club, Mollison Drive	-	UGS	3.60	1	1	0	1	1	1	1	1	1	6	Open Space
Carshalton Lawn Tennis Club, off Beeches Avenue, Carshalton	-	UGS	0.70	1	1	0	1	1	1	1	1	1	6	Open Space
Carshalton Athletic F.C., off Wrythe Lane, Carshalton	-	UGS	1.70	1	1	0	1	1	1	1	1	1	6	Open Space
Benhill Estate Green Space	-	UGS	1.00	1	1	0	1	1	1	1	1	1	6	Open Space
Barrow Hedges Primary School grounds	-	UGS	1.10	1	1	0	1	1	1	1	1	1	6	Open Space
Land at Hannibal Way	-	Windfall	4.12	1	1	0	1	1	1	1	1	1	6	YES
Land to the west of Carshalton Athletic FC	S90	Allocation	2.40	1	1	0	1	1	1	1	1	1	6	Allotments
Open Space corner of Kimpton Park Way and Oldfields Road	-	Windfall/MO	0.60	1	1	0	1	1	1	1	1	1	6	YES
Elm Grove Estate	STC45	Allocation	0.50	1	1	1	1	1	0	1	1	1	6	Needed for Allocation
Former Century Youth Centre, Fellowes Road,	S69	Allocation	0.35	1	1	1	0	1	1	1	1	1	6	Built out
Land south of The Pastures, Carshalton Road, Woodcote	S104	Allocation	0.58	1	1	1	1	1	1	1	0	1	6	YES
St Nicholas Shopping Centre, Sutton	-	Site Identifi	2.10	1	1	1	1	1	0	1	1	1	6	Needed for new civic offices and town centre uses.
Cheam Library, Church Road, Cheam, Sutton, SM3 8QH	-	Site Identifi	0.30	1	1	1	1	1	0	1	1	1	6	Needed for allocation
Former Mortuary, Sutton Cemetery, Alcorn Close	-	Site Identifi	1.10	1	1	0	1	1	1	1	1	1	6	Site previously ruled out
Woodcote Green Belt Part 9 (Field to east of current G&T site)	-	GB	3.07	1	1	0	1	1	1	1	0	1	5	YES. Adjacent to existing site
Woodcote Green Belt Part 6 (Field surrounding current G&T site)	-	GB	6.88	1	1	0	1	1	1	1	0	1	5	YES. Adjacent to existing site
Ludlow Lodge, Alcester Road	S9	Allocation	0.54	1	1	1	0	1	0	1	1	1	5	Built out
Open Land within BedZED and Land North of BedZED, Hackbridge	S3	Allocation	7.50	1	1	0	0	1	1	1	1	1	5	Built out for new school
Former Playing Fields, Sheen Way, Wallington	S97	Allocation	2.50	1	1	0	0	1	1	1	1	1	5	Under construction for new school
Watson Avenue	-	Allotments	0.40	1	1	0	1	1	0	1	1	1	5	Site in demand
Orchard Allotments (formerly Bute Road)	-	Allotments	1.00	1	1	0	1	1	0	1	1	1	5	Site in demand
Cheam Park Paddock	-	Allotments	0.30	1	1	0	1	1	0	1	1	1	5	Site in demand
Cheam Park Nursery	-	Allotments	0.90	1	1	0	1	1	0	1	1	1	5	Site in demand
Cheam Court (includes Forge Lane)	-	Allotments	3.00	1	1	0	1	1	0	1	1	1	5	Site in demand
Bute Road (formerly Croydon Road)	-	Allotments	1.50	1	1	0	1	1	0	1	1	1	5	Site in demand
Buckland Way	-	Allotments	1.30	1	1	0	1	1	1	1	0	1	5	Site in demand
Woodcote Green Belt Part 5 (Field south of Oaks Farm)	-	GB	5.87	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 48 (Queen Mary's Park)	-	GB	8.02	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 41 (Land west and south of Wellfield Gardens)	-	GB	4.92	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 4 (Oaks Farm)	-	GB	11.43	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 39 (Land north west of Wellfield Gardens)	-	GB	0.74	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 3 (Oaks Park)	-	GB	23.77	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 2 (Oaks Golf Course)	-	GB	37.56	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 16 (Oak Lodge Farm)	-	GB	40.08	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 15 (Recreation Ground)	-	GB	6.33	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Woodcote Green Belt Part 1 (Fairlawn)	-	GB	34.36	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
Land along Cuddington Way	-	GB	4.53	1	1	0	1	1	1	1	0	1	5	High functioning Green Belt
St Helier Open Space - North East of Middleton Road	-	MOL	4.45	1	1	0	1	1	0	1	1	1	5	High functioning MOL
St Helier Open Space - In front of the hospital	-	MOL	7.41	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Public Open Space	-	MOL	65.86	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Roundshaw Downs - Playing Fields	-	MOL	8.80	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Poulter Park	-	MOL	4.38	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Mayflower Park	-	MOL	10.44	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Land to the rear of Ridge Road	-	MOL	2.12	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Kimpton Linear Park	-	MOL	1.09	1	1	0	0	1	1	1	1	1	5	High functioning MOL
Grove Park Recreation Ground	-	MOL	1.28	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Grove Park	-	MOL	6.71	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Green Lane Primary School playing fields - Western Part	-	MOL	7.09	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Green Lane Primary School playing fields - Eastern Part	-	MOL	4.95	1	1	0	1	1	1	1	0	1	5	High functioning MOL
Cheam Park Recreation Ground	-	MOL	13.31	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Cheam Park Depot	-	MOL	1.70	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Cheam Park	-	MOL	9.74	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Carshalton Ponds	-	MOL	1.67	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Beddington Farmlands Part 16 (Beddington Park)	-	MOL	67.97	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Bandon Hill Cemetery	-	MOL	7.88	1	1	0	1	1	0	1	1	1	5	High functioning MOL
Wrythe Recreation Ground, Wrythe Lane, Carshalton	-	POS	2.70	1	1	0	1	1	0	1	1	1	5	Public Open Space
Wrythe Green (as extended), Wrythe Lane, Carshalton	-	POS	1.20	1	1	0	1	1	0	1	1	1	5	Public Open Space
Sutton Ecology Centre, Carshalton	-	POS	2.20	1	1	0	1	1	0	1	1	1	5	Public Open Space
St. Mary's Field, Bute Road, Wallington	-	POS	0.50	1	1	0	1	1	0	1	1	1	5	Public Open Space
Springclose Lane, Cheam	-	POS	0.40	1	1	0	1	1	0	1	1	1	5	Public Open Space
Queen Elizabeth Walk, Wallington	-	POS	1.90	1	1	0	1	1	0	1	1	1	5	Public Open Space
Pond, War Memorial and Garden of Remembrance, Carshalton	-	POS	0.50	1	1	0	1	1	0	1	1	1	5	Public Open Space
Overton Park (Southern Part), Overton Road, Belmont	-	POS	3.02	1	1	0	1	1	1	1	0	1	5	Public Open Space

Annex 1: Long List of Potential Sites

Overton Park (Northern Part), Overton Road, Belmont	-	POS	6.75	1	1	0	1	1	1	1	0	1	5	Public Open Space
Mellows Park, Stafford Road, Wallington	-	POS	7.70	1	1	0	1	1	0	1	1	1	5	Public Open Space
Love Lane Playground, Rosehill	-	POS	0.40	1	1	0	1	1	0	1	1	1	5	Public Open Space
Dorchester Road Recreation Ground, Worcester Park	-	POS	2.50	1	1	0	1	1	1	1	0	1	5	Public Open Space
Cuddington Recreation Ground, Sandringham Road, Worcester Park	-	POS	10.10	1	1	0	1	1	1	1	0	1	5	Public Open Space
Carshalton Park, Ruskin Road, Carshalton	-	POS	9.20	1	1	0	1	1	0	1	1	1	5	Public Open Space
Belmont Park, Belmont Road, Belmont	-	POS	1.80	1	1	0	1	1	0	1	1	1	5	Public Open Space
Back Green, Green Lane, Worcester Park	-	POS	2.30	1	1	0	1	1	1	1	1	0	5	Public Open Space
Worcester Park A.C., Green Lane, Worcester Park	-	UGS	2.80	1	1	0	1	1	1	1	1	0	5	Public Open Space
Wallington Cricket Club, Wordsworth Road	-	UGS	1.90	1	1	0	1	1	0	1	1	1	5	Public Open Space
The Cheamfields Club, Devon Road, Cheam	-	UGS	0.60	1	1	0	1	1	0	1	1	1	5	Public Open Space
Sutton Tennis and Squash Club, Devonshire Road, Sutton	-	UGS	0.70	1	1	0	1	1	1	1	0	1	5	Public Open Space
Purley Sports Club, off Lordsbury Field, Woodcote Green	-	UGS	3.50	1	1	0	1	1	1	1	0	1	5	Public Open Space
Playing Field, North of the Grove	-	UGS	1.10	1	1	0	1	1	0	1	1	1	5	Public Open Space
Manor Park Primary School	-	UGS	0.45	1	1	0	1	1	0	1	1	1	5	Public Open Space
Devonshire Primary School Playing Fields	-	UGS	0.40	1	1	0	1	1	1	1	0	1	5	Public Open Space
Devonshire Avenue Nature Area	-	UGS	0.40	1	1	0	1	1	1	1	0	1	5	Public Open Space
Cheam Sports Club, Peaches Close, Cheam	-	UGS	5.30	1	1	0	1	1	0	1	1	1	5	Public Open Space
Aultone Way Allotments	-	UGS	0.80	1	1	0	1	1	0	1	1	1	5	Built out for housing / allotments
Part of the School Grounds, Avenue Road	-	Windfall	0.54	1	1	0	1	1	1	1	0	1	5	Public Open Space
Buckland Way Recreation Ground	-	Windfall	0.49	1	1	0	1	1	1	1	0	1	5	Public Open Space
Wallington Hall and Car Park	S12	Allocation	0.54	1	1	1	0	1	0	1	1	1	5	Built out
Land to NE of Durand Close	-	Windfall	0.57	1	1	0	0	1	1	1	1	0	4	Playspace for the Estate Regeneration Scheme
Spencer Road New Site	-	Allotments	0.90	1	1	0	1	1	0	1	1	0	4	Site in demand
Goose Green	-	Allotments	1.10	1	1	0	1	1	0	1	1	0	4	Site in demand
Woodcote Green, Sandy Lane South, Wallington	-	POS	1.00	1	1	0	1	1	0	1	0	1	4	Public Open Space
Watercress Park, Spencer Road, Hackbridge	-	POS	0.90	1	1	0	1	1	0	1	1	0	4	Public Open Space
Former Watercress Beds, Guy Road, Beddington	-	POS	2.90	1	1	0	1	1	0	1	1	0	4	Public Open Space
Land South of Mallinson Road	-	MOL	1.53	1	1	0	1	1	0	1	1	0	4	MOL / POS / Flood Zone / CA
Richmond Green, Beddington	S67	Allocation	0.48	1	1	1	0	1	0	1	1	0	4	Built out

Annex 2: Short List of Potential Sites

	1: Chaucer Gardens	2: Hannibal Way	3: Land at Kimpton Park Way and Oldfields Road	4. Land South of The Pastures, Woodcote Road	5: Woodcote Green Belt (Field to east of current G&T site)	6: Woodcote Green Belt (Field surrounding current G&T site)
PLANNING CRITERIA FROM LONG LIST						
Brownfield Land (0 or 10)	10	10	0	0	0	0
No new build since 2004 (0 or 10)	10	10	10	10	10	10
Road access safe (0 or 10)	10	10	10	10	10	10
Not within or adjacent to a CA or ASLC (0 or 10)	10	10	10	10	10	10
Essential services likely to be available (0 or 10)	10	10	10	10	10	10
1km from local or town centre (0 or 10)	10	10	10	10	10	10
Not in Flood Risk Zone 3 (0 or 10)	10	10	10	10	10	10
<i>Sub-total</i>	70	70	60	60	60	60
DETAILED PLANNING CRITERIA						
Not incongruous in area of suburban character? (10/5/0)	0	10	0	10	10	10
c500m from local or town centre? (10/0)	10	10	0	10	10	10
Not close to another G&T site? (10/0)	10	10	10	0	0	0
c500m from primary school? (10/0)	0	10	0	0	0	0
Not on contaminated land (10/0)?	10	10	10	10	10	10
No further flooding issues (10/5/0)?	0	10	5	10	10	10
Not within or adjacent to a SINC? (10/5/0)?	5	10	10	0	0	0
None or poor trees within site? (10/5/0)?	10	10	5	5	5	5
<i>Sub-total</i>	45	80	40	45	45	45
DEVELOPABILITY						
Is existing use able to be reprovided/not needed? (10/0)	0	10	10	10	10	10
Can site be easily screened on all sides? (10/5/0)	10	5	10	10	10	10
Site entrance good/satisfactory/poor? (10/5/0)	0	5	0	10	10	10
Distance to the strategic road network? (10/5/0)	0	0	10	10	10	10
Is site safe/suitable for children? (10/0)	10	10	10	10	10	10
Is the site still available? (10/0)	10	10	10	10	10	10
<i>Sub-total</i>	30	40	50	60	60	60
HOUSING CRITERIA						
GRAND TOTAL	145	190	150	165	165	165
Rank	6	1	5	2	2	2