

### 3 METHODOLOGY

#### 3.1 Site Selection Criteria

- 3.1.1 When determining the site selection criteria it is important to emphasise that, as well as identifying constraints, criteria must also set minimum quality standards and legislative requirements for the sites selected. The ODPM Circular asserts that policy must be *“fair, reasonable, realistic and effective”* in order to deliver suitable sites, and we have adopted this view when devising the criteria. It also states that the list of criteria should not be too long as *“the more criteria there are, the more restrictive they are”*. This held true when the first draft of the criteria was implemented and found far too few opportunities, particularly once the Green Belt and Area of Natural Beauty were introduced as constraints. Our previously undertaken Site Selection Report is included in Appendix One.
- 3.1.2 Sites were assessed against broad and then specific criteria in a two-tiered approach. The following section categorises and discusses the criteria. The search area was assessed against broad criteria to remove certain inappropriate land from consideration. Once initial search areas were identified they were then assessed against specific criteria in order to inform the identification of potential sites for Gypsy and Traveller accommodation.

##### **Broad Criteria**

- 3.1.3 Broad criteria based on constraints were used to remove fundamentally unsuitable sites from consideration. Examples of such criteria included the following:
- Existing residential areas, town centres and the majority of employment sites shall not be considered unless identified as potential developable land
  - Previously developed sites and empty or under-used buildings suitable for housing shall be considered. *The councils will provide a register of unused properties, including surplus public owned land. Previously developed land and urban land may be available in the future and the use of this can be considered at that time, using the policy criteria, ahead of Green Belt and AONB sites.*
  - Sites shall not be located within ‘Protected Areas’: Conservation Areas, SSSIs, SAMs, RIGs, Flood Plain, Registered Parks and Gardens, and Area of Outstanding Natural Beauty. The ODPM consultation document states: *“in areas with nationally recognized designations planning permission for gypsy and traveller sites should only be granted where it can be demonstrated that the objectives of the designation will not be compromised by the development”* (para 36). The Government considers it would be inappropriate to suggest a policy criterion that sets a total ban on Gypsy and Traveller sites in areas with nationally recognised or local designations. However, such designations should have very considerable weight in the appraisal of potential sites.

- 3.1.4 As discussed in paragraph 3.1.1, broad criteria initially included avoidance of the Green Belt. This was found to be too restrictive as this meant the majority of the study area was removed from consideration, as shown in Figure 2. A sequential approach was followed, which is discussed in paragraph 3.1.7.