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INTRODUCTION AND POLICY AIM

3.1 The reduction of the City's population over 20 years (see paragraph 1.14), mainly because of outward migration, ceased in the early 1990s. The 1993 Plan anticipated broad population stability and the Plan assumes that this situation will continue.

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- 3.2 However, this broad population stability has been accompanied by an increase in the number of households due to changes in the way people live. In particular, there has been an increase in the number of single person households due to:
 - young people forming their own households;
 - more divorced people;
 - more single parents; and
 - more pensioners living by themselves.
- 3.3 The rate of dwelling unfitness has remained static since the late 1980s, although improvement action has seen a change in priorities from inner city dwellings and the private rented sector to the inter-war housing stock and some outer areas of the City.
- 3.4 The policy aim for the Housing Chapter is to promote the provision of the right quantity and quality of housing to meet the needs of a population broadly the same size as at present, whether by providing market or "social" housing.

National and Regional Planning Guidance

- 3.5 Planning Policy Guidance Note "Housing" 1992 (PPG 3) and Regional Planning Guidance for the West Midlands (RPG 11) which was first issued in 1995 and subsequently, with a revised housing section, in 1998, form the key Government advice on housing provision.
- 3.6 The main objectives of RPG 11 are:
 - ensuring the availability of five years supply of housing land;
 - counteracting decentralisation and the process of environmental, social and economic decline through regeneration;
 - promoting a sustainable pattern of development;

- making best possible use of previously developed land and existing buildings achieving 61% of new build on "brownfield" sites;
- making full use of the existing housing stock through improvement and repair;
- adding to the housing stock by bringing vacant housing units back into use, subdivisions of larger dwellings, taking a more flexible approach to the re-use of vacant sites and converting property over shops or former office buildings;
- providing a mixture of house types, catering for the needs of all sections of the community;
- providing for affordable and social housing;
- phasing the provision of development on greenfield sites where appropriate; and
- making adequate provision for sites for travellers.
- 3.7 Government Circular 6/98 "Planning and Affordable Housing" states that a community's need for affordable housing is a material consideration for development plans. RPG 11 makes it clear that affordable housing includes social housing.
- 3.8 PPG 2 "Green Belts" 1995 confirms that Green Belts should be protected as far as can be seen ahead and refers to the identification of safeguarded land which may be required to serve development needs in the longer term.

Local Context

- 3.9 The Coventry Community Plan (see Overall Strategy Chapter) includes housing matters under its priorities to:
 - tackle poverty;
 - create an exciting vibrant City Centre; and
 - meet the needs and aspirations of older people.

It refers to the needs to direct investment into housing, provide housing for all ages within the City Centre and enable people to live longer in their own homes.

- 3.10 The City Council's Housing Strategy provides the basis for co-ordinating housing activity in the City. It is based around key themes of:
 - dealing with the housing needs of the City and condition of its housing stock;
 - focusing on disadvantaged groups; and
 - working in partnership with housing providers and agencies.
- 3.11 In order to assist in the delivery of the Housing Strategy, Coventry Housing Action Partnership was established in 1996. This draws together the City Council, local experts, private sector agencies and voluntary sector organisations through a structured partnership in the form of a company limited by guarantee. It aims to assist in identifying strategic housing needs and in developing and implementing actions to meet these needs.
- 3.12 The City Council's Environmental Strategy provides a framework for environmental action in key policy areas, of which health and the built environment have particular implications for housing. Its Anti-Poverty Strategy deals with certain aspects of housing, such as tenants' issues, homelessness and housing benefits.
- 3.13 The 1992 household projections for the West Midlands show that the number of households in the Region will increase by 295,000 between 1991 and 2011. Taking account of factors such as vacancies and demolition rates, RPG 11 states that housing provision in the West Midlands should rise to 335,000 dwellings and that 11,100 dwellings are to be provided in Coventry between 1991 and 2011.

OVERALL HOUSING STRATEGY

H 1: PEOPLE AND THEIR HOUSING NEEDS

All existing and future citizens should have access to a range of housing that is of satisfactory size and condition and within a high quality residential environment.

(Part 1 Policy)

3.14 In considering housing across the City, the needs of the various sections of the population will be taken into account, particularly in terms of forecast changes in the age structure, household size and other characteristics of the City's population.

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Household Change and Housing Provision

H 2: BALANCING NEW AND EXISTING HOUSING

The provision of new and replacement housing shall be promoted and encouraged to meet needs and provide choice in all housing sectors which cannot be satisfied by the optimum use of existing housing.

Priority will be given to:

- maintenance and improvement of the existing stock and the improvement of its environment;
- the sub-division of large dwellings and the conversion of non-residential buildings to housing units wherever these are consistent with the provision of a satisfactory residential environment;
- a reduction in the number of vacant dwellings; and
- the clearance and redevelopment of housing which has reached the end of its useful life, helped by the proactive use of statutory powers where alternative action proves impractical.

(Part 1 Policy)

3.15 People's need for housing is met from both the existing stock and from the use of development land for new housing. Thus, although the household projections indicate significant increases amongst particular types of household, the provision of land for new housing should be at a level which caters for the demand for the types and tenures of housing that cannot be satisfactorily provided through the maximum use of the existing stock. 3.16 It is particularly important that the best possible use is made of brownfield land and buildings. This can be helped by identifying such sites, assembling land, resolving infrastructure problems, promoting appropriate development and minimising the use of greenfield sites. The unacceptable alternative is the outward expansion of the built-up area and increased dereliction in the inner areas. The quantity of accommodation that brownfield sites can deliver will be affected by detailed design considerations and the need to protect and provide green space within and adjacent to brownfield housing sites. This will create a high quality environment and avoid "town cramming".

THE EXISTING HOUSING STOCK

Improvement of Existing Housing

H 3: THE IMPROVEMENT OF THE HOUSING STOCK

The City Council will promote and encourage co-ordinated action with other agencies to improve sub-standard dwellings and carry out environmental improvements to assist area renewal.

(Part 1 Policy)

- 3.17 The needs of those living in existing housing are as important as those seeking new housing - and the City has an ageing housing stock. About 85% of the City's housing stock was built before the mid 1960s and 60% was built before the Second World War.
- 3.18 A House Condition and Housing Need Survey was carried out across the City in 1995 and covered a sample of 2,700 private and housing association dwellings and 500 council dwellings. The Survey found that:
 - 19.5% of the City's private and housing association dwellings are unsatisfactory through unfitness or poor repair, comprising
 - 9.1% unfit and 10.4% in poor repair but not unfit.

The level of unfitness has remained static since the 1988 House Condition Survey. It is significantly higher than both the average national rate of 7.6% from the English House Condition Survey 1991 and the rate for the West Midlands Region of 5.6%.

- 3.19 The 1995 Survey also found that:
 - poor condition dwellings are concentrated in particular areas and sectors, especially older properties, the private-rented sector and inner city areas;
 - recent trends show a spread of poor condition into the owner-occupied stock, inter-war housing and the inner suburbs;
 - there is a high concentration of economically disadvantaged households living in poor condition dwellings, including the elderly, the unemployed, those on low incomes and those from ethnic minority communities.
- 3.20 The Survey recommended that action on unfit dwellings should be orientated towards repair and improvement. Out of the City-wide total of 9,100 unfit dwellings, 95% were suitable for individual repair or improvement and 4% were recommended as suitable for repair on a group or block basis. The Survey recommended only 1% (just under 100 dwellings) for individual closure or demolition.
- 3.21 A new Housing Needs Survey has been commissioned by Coventry Housing Action Partnership, in association with the City Development Directorate and the Foleshill Regeneration Board.
- 3.22 The Plan cannot directly influence the nonplanning policies of other agencies for the improvement of poor housing. However, the replacement of mandatory grants by discretionary grants enables a greater focus on area renewal and the Plan can be a part of a framework for action, especially taking into account the priorities in specific areas, including environmental improvements, the application of design standards and land assembly.
- 3.23 There are areas of the City, both in private and City Council ownership, where poor housing is matched by a poor environment. Inadequate street lighting, poor maintenance, threatening traffic conditions and a lack of landscape features all contribute to this. Support will be given to schemes which improve environmental conditions, as well as the creation of safer and healthier neighbourhoods.

Conversions

H 4: CONVERSION FROM NON-RESIDENTIAL TO RESIDENTIAL USE

Proposals for the conversion of nonresidential buildings to residential use will be permitted subject to:

- the creation of satisfactory living accommodation;
- the character and quality of the resulting residential environment;
- · compatibility with nearby uses; and
- compatibility with other Plan policies.
- 3.24 Conversions of property into residential use contribute towards the overall supply of housing in the City. Between 1993 and 1996 a net increase of almost 100 dwellings occurred as a result of conversions. There is potential to increase this contribution and, indeed, conversions can assist the diversity, vitality and security of an area.
- 3.25 The conversion of local shops where there is a long-term over-supply of them to residential use will be supported. There is also potential for "living over the shop" schemes in the City Centre and other defined Centres. There is also potential for the conversion of office blocks and other comparable buildings.

H 5: CONVERSION TO MULTIPLE OCCUPATION

Proposals for conversion to, enlargement or alteration of houses in multiple occupation will be considered on the basis of:

- the size and character of the property;
- the facilities available for car parking;
- the impact on the amenities of adjoining properties; and
- the cumulative impact on the amenities and character of the surrounding area.
- 3.26 Houses in multiple occupation (HIMOs) can include self-contained flats, bed-sits and shared houses. They are occupied by a number of people who do not live together as a single household. Although such accommodation plays an important role in the overall supply of housing, it can also present problems in a particular street or area. Large numbers of residents in any one

dwelling can adversely affect the amenities of adjoining occupiers, for example because of increased noise and on-street parking. The use of small terraced, narrow fronted or semidetached houses as HIMOs will commonly cause disturbance to neighbours and will be resisted unless these issues are adequately addressed. The cumulative impact of such changes can harm the character of an area which has dwellings mainly designed for one household.

3.27 In considering proposals, it is important to protect the character and amenity of local neighbourhoods and to ensure that overintensive use of properties does not occur. Supplementary Planning Guidance includes a section referring to HIMOs.

LAND FOR NEW HOUSING

Scale of Provision for New Housing

H 6: HOUSING LAND PROVISION

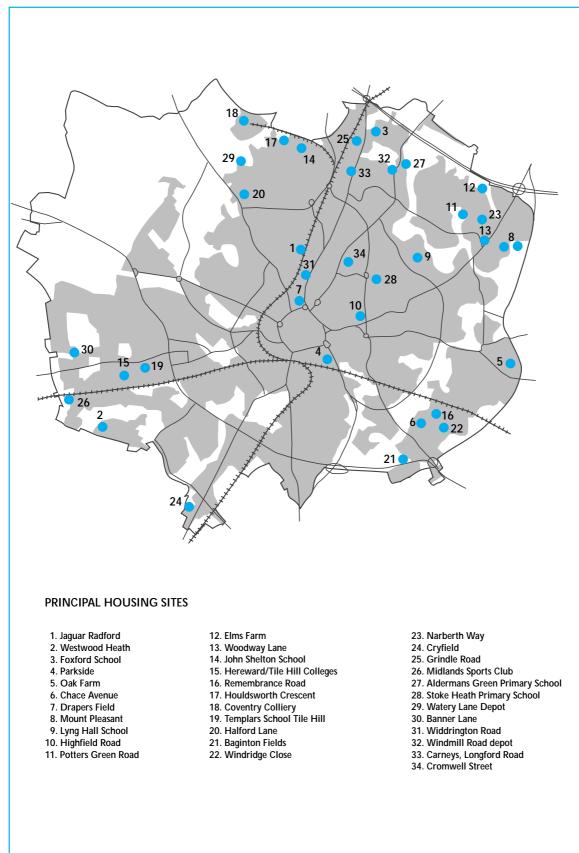
Provision will be made for the development of at least 8,270 new dwellings between the years 1997 and 2011.

(Part 1 Policy)

3.28 RPG 11 requires land to be identified in Coventry for the provision of 11,100 dwellings during the period 1991 to 2011. The Table below sets out the components of land supply to meet this target.

Dwellings already completed ²	1991-97	2830
Identified capacity (April 1997)	4275
New sites in the City Centre		1000
Windfall Capacity (sites > 1 hectare sites < 1 hectare	1520 1530)	3050
Other Capacity (Conversions Clearance Sites	420 105)	525
TOTAL		11680

3.29 There were 2,830 dwelling completions between 1991 and 1997 leaving a requirement of 8,270 dwellings for the remaining fourteen years of the Plan. This will be met through a combination of identified sites, windfalls, conversions and cleared sites and sites in the City Centre.



- 3.30 In April 1997, identified sites had a capacity of 4,275 dwellings, leaving capacity for a further 3,995 dwellings to be identified to meet the RPG 11 target in Policy H6.
- 3.31 A feature of the Plan is the promotion of residential development in the City Centre. Government guidance aims to promote mixed uses and one of the priorities of the Coventry Community Plan is to create an exciting and vibrant City Centre. The Coventry Shopping Study work by consultants Donaldsons has shown that one of the reasons for the poor overall performance of the City Centre is its lack of housing.
- 3.32 1,000 dwelling units are expected to be provided in the City Centre during the Plan Period. There will be three elements in the achievement of this target:
 - new residential sites (in addition to those listed in Policy H7);
 - · office conversions; and
 - "living over the shop".

This subject is dealt with in more detail in the City Centre Chapter and Policies CC 4 to 8.

- 3.33 "Windfall" sites are those which become available during the Plan period which have not been identified in Policy H7 or previous housing land studies. Experience in the 1990s has shown that, for sites under one hectare, an average of over 140 dwellings per year can be expected to come forward. On sites greater than one hectare, the average is over 180 dwellings per year. On this basis, windfall sites are expected to provide 3,050 units over 14 years. This is a cautious assumption which may well be over-achieved on past trends.
- 3.34 An important source of housing over the Plan period comes from conversions of buildings such as shops and offices outside the City Centre to residential use. Past experience shows that such conversions can provide an average of approximately 30 dwellings per year, equivalent to 420 dwellings over 14 years. More flexible policies may lead to an increase in this number as well.
- 3.35 The RPG 11 housing target of 11,100 takes account of estimates supplied by the former West Midlands Forum of Local Authorities of the number of residential demolitions. Recent evidence shows that anticipated demolitions might be somewhat higher in

Coventry at approximately 45 p.a., a total of 210 greater than previously assumed by Forum. Against this increase in demolitions, replacement dwellings on cleared housing sites is expected to provide 315 dwellings (at the lower figure of 50% replacement of all demolitions). Therefore, taking these two factors together, a net allowance of 105 replacement dwellings on cleared sites is now assumed for 1997-2011.

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New Housing Development

H 7: PRINCIPAL HOUSING SITES

Principal housing sites are those with capacity for at least 25 dwellings available at April 1997. They are reserved for residential development or redevelopment and are shown on the Proposals Map at:

		600
	Jaguar Radford	600
_	Westwood Heath	335
	Foxford School	319
-	Parkside	300
	Oak Farm	243
	Chace Avenue	181
	Drapers Field	141
8	in to write i readount	137
9		120
10	Highfield Road	100
11	Potters Green Road	71
12	Elms Farm	70
13	Woodway Lane	67
	John Shelton School	66
	Hereward/Tile Hill Colleges	58
	Remembrance Road	57
17	Houldsworth Crescent	50
18	Coventry Colliery	50
19		49
20		43
21	Baginton Fields	40
22		40
23		40
	Cryfield	36
	Grindle Road	35
	Midlands Sports Club	35
	Aldermans Green Primary School	35
28		35
	Watery Lane Depot	35
	Banner Lane	33
	Widdrington Road	27
32	Windmill Road Depot	25
33		25
34		25
51		23
	TOTAL	3523

3.36 The above sites are shown on the Proposals Map and on Text Map H 1. In addition to these, a further 752 dwellings can be provided on sites with capacity for under 25 dwellings making up the total of 4,275 dwellings set out in paragraph 3.30. The figures shown in the Policy are derived either from existing planning permissions or from individually estimated capacity based on the likely market for development on the site. These figures are thus for guidance, with the eventual capacity depending on site by site analysis. The Policy provides for a wide range of choice by size, type and location. Brownfield sites make up 64% of total capacity.

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- 3.37 There are significant links in the operation of the housing market between inner and outer areas. Paragraph 9.6 of RPG 11 indicates that authorities may choose to of the provision housing phase development on greenfield sites, which might otherwise be developed too quickly. The City Council has considered the inclusion of a policy to ensure a balance between brownfield and greenfield development. However, it believes that both past trends in the amount of brownfield sites which have been developed and the significant proportion of available capacity on brownfield sites make such a policy unnecessary in Coventry.
- 3.38 Policy H 7 contains no new additional greenfield allocations on the edge of the built-up area and only small quantities of land in the built-up area not previously built on. A number of other peripheral greenfield allocations are areas remaining from the 1993 Plan and the Rugby Borough Local Plan (sites now within the modified City boundary). The City Council has considered paragraph 3.12 of PPG 2 and has concluded that it is not necessary or appropriate to "safeguard" additional peripheral areas of land. In reaching this decision, it has taken into account the anticipated surplus over the RPG 11 housing requirement set out in Policy H 7, together with the likelihood that windfalls will continue at the envisaged level. At the time of Plan preparation there are a number of sites that may come forward for residential development which will be considered under Policy H 8. An example of this is the surplus hospital land related to prospective Hospital redevelopment. Coventry City Football Club at Highfield reserved Road is for residential

redevelopment in Policy H 7, although planning permission is subject to the availability of the Arena proposal at Foleshill Gasworks. A similar approach is likely to be taken at the Coventry Rugby Football Club ground at Coundon Road/Barker's Butts Lane where residential redevelopment would be acceptable under Policy H 8 if the requirements of other Plan policies are met, such as the need for a suitable replacement facility in accordance with Policy GE 4.

Additional Housing Land

H 8: WINDFALL ADDITIONS TO HOUSING LAND SUPPLY

Proposals for housing development on sites not identified in either Policy H 7 or in the City Council's 1997 Unitary Development Plan Monitor, will be considered on the basis of:

- compatibility with nearby uses;
- the character and quality of the resulting residential environment;
- proximity to public transport and local facilities; and
- compatibility with other Plan policies.
- 3.39 As well as sites identified in Policy H 7, proposals will come forward for development or redevelopment on sites not currently identified. Indeed, the calculations on overall housing supply set out in paragraph 3.28 include an assumption that such "windfalls" will account for some 3,050 dwellings between 1997 and 2011.

Affordable Housing

3.40 The decline of low-cost private rented housing, the loss of social rented housing and the increasing cost of owneroccupation have increased the difficulties experienced by some households in gaining access to the housing market.

- 3.41 The issue of affordability is critical to many households. The Housing Needs Survey 1995 found that 56% of households had a gross annual income of less than £15,000. Amongst public sector households, 36% of heads of household were unemployed, whilst 42% had weekly incomes of less than £80 and whilst 55% of private-rented sector households want to move into owneroccupation, 60% have weekly incomes below £100 per week.
- 3.42 Coventry possesses a significant amount of "second-hand" housing. However, there is a particular need for new build housing, of good quality, covering a range of size and facilities across all tenures (including both subsidised and low-cost market housing) throughout the City.

H 9: AFFORDABLE HOUSING

Planning permission (or its renewal) for residential development in the following categories will, if the sites are suitable for affordable housing, be conditional upon negotiation of an element of affordable housing:

- development of residential sites allocated in Policy H 7; and
- other development of residential sites of 1 or more hectare or of 25 or more dwellings.

In such cases, an element comprising at least 25% of the proposed number of dwellings will normally be sought. There will be a strong preference for this to be provided by means of dwellings owned and managed by a registered social landlord.

Sites will be considered suitable for such an element of affordable housing unless:

- there is already a high concentration of such dwellings in the nearby area;
- the site is inaccessible by a choice of means of transport;
- there are abnormal development costs affecting the economic viability of the proposal;
- their inclusion would adversely affect the quality and range of the City's housing stock; or
- the site is in the City Centre.

3.43 Affordable housing is subsidised and low cost market housing which is available to people who cannot afford to occupy houses generally available on the open market. Social housing is provided by an organisation such as a local authority, housing association or local housing company which allocates accommodation on the basis of need. Affordable housing will be sought not only where an application is made for permission for the first time but also where application is made to renew or extend an existing permission.

- 3.44 New affordable housing may take the form of:
 - housing developed by, or transferred to, a housing association or other similar social landlord;
 - housing reserved (preferably in perpetuity) for occupation or ownership by those people identified as unable to compete successfully in the general housing market; or
 - housing otherwise available at low cost.
- 3.45 Failure to meet needs for affordable housing would not only mean that a significant element of overall need would not be translated into effective demand but the housing aspirations of many vulnerable households would be unfulfilled. Indeed, restricted provision of social housing is likely to mean a less rapid household growth combined with greater rates of sharing and more "concealed" households.
- 3.46 Decisions about what types of affordable housing to build will reflect local housing need as identified through the Housing Needs Surveys and the suitability of individual sites. Both planning conditions and planning obligations will be used to secure the provision of affordable housing.
- 3.47 In Coventry the City Council regards social housing owned and managed by a social landlord as the most effective and reliable means of meeting the need for affordable housing. Other mechanisms will be considered but would need to be clearly justified as providing an equivalent degree of accessibility and permanence. Exceptionally, the payment of a contribution to the cost of providing affordable housing at another location may be considered if that would better meet identified needs for affordable housing and not compromise the acceptability of the development proposed.

3.48 A particular advantage of the involvement of housing associations and similar bodies will be to help secure the benefits of affordability for future occupiers and not just to the first purchaser. However, where they are not involved, the City Council will seek arrangements to ensure permanent affordability through the use of both planning conditions and planning obligations.

Housing for People with Special Needs

H 10: HOUSING FOR PEOPLE WITH SPECIAL NEEDS

Provision for people with special housing needs will be promoted and encouraged through Planning Briefs and pre-application discussions with developers in the light of Supplementary Planning Guidance.

- 3.49 The City Council has a responsibility to cater for both housing needs and demands. It is the City Council's role to ensure that sufficient land is made available to meet identified needs while demand is expressed principally through the private housing market.
- 3.50 Particular forms of housing provision are being developed to meet the needs of specific groups within the community. Such groups can include:
 - disabled people;
 - people with mental health problems;
 - people with learning disabilities;
 - people who misuse alcohol or drugs;
 - old and young people with housing problems; and
 - women and children subject to domestic violence.

Whilst there are aspects of such accommodation which will not be relevant to the City Council's role as planning authority, it is important that the City Council as a whole works in partnership with other organisations and agencies to ensure that this accommodation is integrated with other types of development throughout the City's residential areas. 3.51 The provision of such housing accommodation can require sensitive and appropriate planning and design. The City Council has produced Supplementary Planning Guidelines (SPG) for such developments. It is important that special needs housing is integrated with other types of development.

Residential Site Development

H 11: DESIGN OF HOUSING DEVELOPMENT

A high standard of design will be required for new housing development in the City.

Proposals will be considered on the basis of:

- their setting and landscaping;
- the provision of open space;
- overall scale and density;
- access and parking arrangements;
- reduction in the use of energy; and
- the character and quality of the local environment.

Where a mix of tenures is involved, strong overall design proposals which achieve full visual integration of the development as a whole will be required.

- 3.52 New housing should make a positive contribution to the urban environment. Careful attention to detail and design is important, as is the relationship of the scheme to the surrounding area. The promotion of good design in residential layouts will be achieved through SPG, the negotiation process and the preparation of design briefs. Particular care will be required where developments contain a mix of uses. The main issues relating to design are referred to in the Built and Green Environment Chapters.
- 3.53 In considering applications for the development of housing sites, the City Council will have particular regard to the following:

Landscaping: The appearance and treatment of the spaces around buildings are as important as the buildings themselves. The City Council will require a high standard of landscaping in new housing developments, with particular reference to durability where higher densities are proposed. (See Policy BE 19).

Density: Average densities have fallen in recent decades, contributing towards the expansion of urban areas. However, higher density developments may be appropriate in locations near to existing centres and near to public transport routes, subject to the ability to create a high quality environment in which to live.

Energy Efficiency: With the global need to save energy, it makes sense to ensure that new houses are well-insulated and designed to minimise fuel consumption. The City Council will encourage developers to consider siting and other means of improving energy efficiency in the design of housing schemes.

Community Facilities: On larger schemes, the City Council will assess the extent to which the new influx of population affects the need for community facilities and will consider what further provision is needed. Planning obligations and other legal agreements may be used to secure appropriate provision (see Policies SCL 13 and IM 2).

Innovation: The development of larger schemes offers opportunities for innovative ways of dealing with sustainability issues. The City Council will particularly welcome proposals to provide healthier environments, to reduce the effect of local traffic in housing schemes and to make fuller use of cycle and pedestrian journeys.

Crime and Personal Security: Proposals to create safe and secure environments will be encouraged.

OTHER HOUSING TOPICS

Care Homes and Nursing Homes

H 12: CARE HOMES AND NURSING HOMES

Proposals for care homes and nursing homes will be permitted subject to:

- compatibility with nearby uses;
- the suitability of the site or building;
- the character and quality of the resulting residential environment;
- accessibility by a choice of means of transport;
- proximity to local facilities; and
- compatibility with other Plan policies.

More detailed guidance is set out in Supplementary Planning Guidance

3.54 Various kinds of residential accommodation with care cater for significant numbers of the elderly, disabled people, people with mental health problems and those with drug or alcohol dependency. Locations within or near housing areas, and close to facilities, are appropriate, although attention must be paid to avoiding harm to the amenity of local residents, especially through increased levels of activity. Proposals may be discouraged in other locations.

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Travellers

H 13: TRAVELLERS

Proposals for sites for travellers must meet the following criteria:

- compatibility with nearby uses;
- the impact on the environmental quality of the surrounding area;
- suitability for their commercial activities and not being detrimental to the economic objectives of the Plan;
- good access to the public highway, with sufficient space on-site for parking and turning;
- reasonable accessibility to local services and facilities;
- provision of defined boundaries with embankments and/or extensive
- landscaping and planting; and
- compatibility with other Plan policies.
- 3.55 RPG 11 states that planning authorities should include locational and/or criteriabased policies to make adequate provision for travellers' sites in line with Department of the Environment Circular 1/94 "Gypsy Sites and Planning".
- 3.56 Locations should be considered which are within a reasonable distance of local services and facilities, for example shops and schools. Sites on the outskirts of builtup areas may be appropriate, provided that they do not encroach onto open countryside. They should not be located in Urban Green Space, Green Belt or on sites of nature conservation significance.

- 3.57 Uses adjoining the site should be considered. The sites may be used for work by travellers and there could be noise disturbance from activities and vehicle movements so that sites adjacent to residential use are not likely to prove suitable.
- 3.58 Sites require good vehicular access to the public highway to allow the movement of heavy vehicles and caravans on and off the site. There also needs to be sufficient space on site for the movement of large vehicles. It is desirable for the site to contain a drained and stable surface and it would be best for much of the site to have a hard surface. There should be well defined boundaries, which can be natural or manmade, giving structure, privacy and maintaining visual amenity for users and any neighbours alike.