

# **Interim Site Design Guide for Gypsy/Traveller Sites in Scotland provided by Local Authorities and Registered Social Landlords**

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## **1. Introduction**

This Site Design Guide has been developed under the Gypsy/Traveller Action Plan, [Improving the Lives of Gypsy/Travellers: 2019-2021](#), published jointly by the Scottish Government and COSLA in October 2019, which includes a commitment to more and better accommodation for Gypsy/Travellers.

In March 2021, the Scottish Government published Housing to 2040 which sets out a vision for housing in Scotland to 2040 and a route map to get there. It aims to deliver our vision for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be. Housing to 2040 announced the Gypsy/Traveller Accommodation Fund, up to £20 million of capital funding is available to local authorities over five years from 2021 to 2026. This Site Design Guide has been developed to sit alongside the funding programme, setting the direction for newly built or refurbished accommodation.

### **1.1 A Message from Community Members**

Throughout the summer of 2021 we spoke to Gypsy/Travellers, through the MECOPP Women's Voices Project and Article 12. This section summarises some of the views expressed during those conversations. We have also added these views as quotes throughout the Site Design Guide.

Gypsy/Traveller communities are not all the same. Different people will want different things so it is very important to listen to what the residents on a site are telling you they need. While not all the same, family is very important to Gypsy/Travellers and sites should be designed with family life at the heart of them. Sites and pitch sizes need to meet the needs of different and growing families.

“Families need space to grow. Enough sites and pitches are needed so that family members can live alongside each other.” Gypsy/Traveller, Consultation Event, July 2021

Like the settled community, Gypsy/Travellers want safe and warm homes where they can live and raise their families. While Gypsy/Traveller sites provide a different type of home to settled housing, they should still be of a good standard and meet the needs of the people living there.

“We are not asking for anything more than the settled community, just the same – a decent place to live.” Gypsy/Traveller, Consultation Event, August 2021

### **1.2 Purpose of the Site Design Guide**

The purpose of the Site Design Guide is to assist public sector providers of Gypsy/Traveller sites to design and provide high quality accommodation for Gypsy/Travellers that meets their needs. In conjunction with the Gypsy/Traveller Accommodation Fund, the Site Design Guide is intended to help meet the following outcomes for Gypsy/Traveller accommodation:

- More accommodation - enough sites/pitches to meet the established needs of Gypsy/Traveller communities;
- Accommodation in suitable locations, taking into account place making principles including, for example, access to local services;
- Sites that provide pleasant places to live and include attractive outdoor space, communal facilities and appropriate facilities, including for children and young people;
- A mix of accommodation with layout and facilities that meet the needs of residents and provides for different family sizes and preferences and to allow for movement to different accommodation on the same site if circumstances change;
- Accommodation built to a high standard, in line with other public housing and relevant principles set out in Housing to 2040;
- Accommodation that is durable, sustainable, flexible, safe, secure, digitally connected, warm and economic to run and at a level of rent that represents value for money for residents;
- Accommodation that meets accessibility standards and provides for a range of needs, including families with members who are elderly, disabled or have caring responsibilities;
- Improved satisfaction with accommodation and more meaningful engagement with Gypsy/Traveller communities;
- Additional transit provision, where needed, to facilitate travelling and foster good relations with the settled community.

### **1.3 Gypsy/Traveller Accommodation Fund**

The Scottish Government and COSLA Leaders have agreed that the Fund should initially be focussed on a number of demonstration projects that can establish examples of model sites. These first projects will allow us to take a flexible approach, trialling the Site Design Guide, exploring what good quality Gypsy/Traveller accommodation that reflects Housing to 2040 principles looks like, and seeking cost effective ways of delivering it. This approach will be reviewed in later years of the Fund. More information on the Fund can be found on the [Scottish Government website](#) or by emailing [gypsy/travellers@gov.scot](mailto:gypsy/travellers@gov.scot)

### **1.4 Development of the Site Design Guide**

Work under Improving the Lives of Gypsy/Travellers: 2019-21, identified the need for a Site Design Guide for new sites or major refurbishment of existing sites. The drive was to set a high quality standard for the future, so that the Minimum Standards for Gypsy/Traveller accommodation, published in 2015, were not seen as the standard for new accommodation.

The Site Design Guide has been developed using current published information and information gathered from Gypsy/Traveller communities on their accommodation needs and preferences, with the input of policy leads and stakeholders. An online survey gathered the views of Gypsy/Travellers to support the development of the Site Design Guide from December 2020 – March 2021. We have referenced the results of the survey and included feedback from discussions with members of Gypsy/Traveller communities throughout the Site Design Guide.

The Scottish Government would like to thank all members of Gypsy/Traveller communities who contributed to the development of the Site Design Guide through completing the online survey or by giving their time to discuss their views with us.

### **The Site Design Guide seeks to:**

- Establish parity with the most relevant standards for the settled community and continue to maintain parity going forward e.g. the standards expected in social housing under the Affordable Housing Supply Programme (AHSP).
- Link to existing standards where possible but select and combine most relevant standards if needed.
- Stretch and future proof, where there is a need to do this to meet the outcomes and to ensure that Gypsy/Traveller accommodation develops in line with the principles in Housing to 2040.
- Support the design process so that Gypsy/Traveller sites meet the needs and aspirations of residents as closely as possible.

## **1.5 Meeting the Needs of Gypsy/Travellers**

Sites are used by Gypsy/Traveller communities in different ways. Some have long standing residents, perhaps only leaving the site to travel in the summer season while on others, families tend to stay for a shorter period. Some may only be open during the summer season or have mixed patterns of use. This Site Design Guide does not offer a single site design to meet the needs of Gypsy/Travellers. It sets out key considerations for the design process. These may need to be prioritised in consultation with residents and community members, e.g. depending on the space available or other limitations on the site. The demonstration projects will help to explore the costs attached to modern site development and how local authorities balance available resources and the priorities of Gypsy/Traveller communities. It also includes some forward looking standards to ensure that newly built or renovated sites offer high quality, robust accommodation that helps deliver on the objectives set out in Housing to 2040.

## **1.6 Terminology**

In this Site Design Guide we have used the following terms. Please note this section defines these terms for the purposes of this document, and is not (and is not intended to be) a reference for how these terms are used in legislation, other guidance or by local authorities and others.

**Amenity Block** – permanent building on a pitch that usually provides bathroom, kitchen and storage facilities. Some amenity blocks will also provide some living space, for example a day room. There is one amenity block per pitch and facilities are not shared.

**Caravan** – a caravan that the resident uses to provide their sleeping accommodation. This is provided by the resident and not the site provider.

**Residential Mobile Home** - a residential mobile home that someone lives in as their residence, this is sometimes referred to as a park home or a chalet. This may be

provided by the site provider or may be installed on a pitch by a resident by agreement.

**Permanent Site** – sites that are open all year round and provide long term accommodation for Gypsy/Travellers. While some residents may travel during the summer months, they retain their pitch and occupancy agreement and return to the site following the period of travel. Some residents stay on the same site for many years while others will stay for shorter periods.

**Seasonal Site** - sites that are open for part of the year. Generally residents travel to and stay on the site for the period of time that it is open.

**Transit Site** – sites that are open all year round to provide access to facilities while people are travelling. People tend to stay on the site for much shorter periods of time.

## **2. Background and Related Policy**

### **2.1 Current Provision**

There are currently 29 public Gypsy/Traveller sites in Scotland provided by 19 local authorities and one Registered Social Landlord (RSL) providing approximately 400 pitches.

### **2.2 Minimum Standards for Gypsy/Traveller Sites**

The Scottish Government published Minimum Standards for Gypsy/Traveller sites in 2015. The Minimum Standards are now part of the Scottish Social Housing Charter. Compliance with the Standards is monitored and reported on by the Scottish Housing Regulator (SHR). The Standards, which were developed, as far as was possible, in line with the Scottish Housing Quality Standard (SHQS) for existing social housing, cover two broad areas: physical facilities and fabric, including the quality of fixtures and fittings, lighting, heating, and a hot and cold water supply; and services provided by the site provider and how it treats site residents.

[Research by SHR](#) found that, while improvements to bring sites up the Minimum Standards on some sites has been positive for residents, there are lessons to be learned for future improvements that could have a greater impact on quality of life for residents. Residents also expressed views about how site standards could be strengthened and these have been taken into account in the development of this Site Design Guide.

This Site Design Guide does not include all of the detail included in the Minimum Standards, and does not replace them. New and refurbished sites should meet the Minimum Standards in addition to the requirements set out in the Site Design Guide. The Minimum Standards also set the standard below which sites should not fall. In time, it may be appropriate to include some elements of the Site Design Guide in the Minimum Standards, in order to drive systematic improvement in the quality of accommodation going forward.

## 2.3 Context

**Ministerial Working Group and Gypsy/Traveller Action Plan** - In December 2017, a Ministerial Working Group (MWG) was established to take action to improve the lives of Gypsy/Traveller communities across a range of issues in response to a report by the Independent Race Equality Adviser that said “Despite parliamentary enquiries and reviews of progress, various reports, strategies and initiatives, little has changed for Gypsy/Travellers in Scotland. They face much the same problems that have troubled them for decades.”

[The 2011 Census](#) evidences the disadvantage of Gypsy/Travellers by comparison with other communities in Scotland. Improved access to suitable, good quality accommodation has the potential to support health improvement, educational achievement and employment opportunities, all of which can impact on poverty. The MWG developed an Action Plan: Improving the Lives of Scotland’s Gypsy/Travellers: 2019 – 2021 which includes actions across a range of areas to improve the lives of Gypsy/Travellers in Scotland including: more and better accommodation; improving access to public services; better incomes in and out of work; tackling racism and discrimination; and improving Gypsy/Traveller representation.

The Action Plan is closely linked to wider shared priorities in the National Performance Framework and ambitions to create a fairer Scotland. This means tackling poverty and inequality and, in particular, bringing an end to child poverty. It also means ensuring that everyone has a safe and secure place to live, and ending homelessness. Above all, this plan is about protecting and promoting human rights, delivering equality and creating strong and cohesive communities.

The life of the plan was extended by 18 months, to October 2022, as a result of the COVID-19 pandemic.

**Housing to 2040** - The Housing to 2040 Vision describes what we want our homes and communities to look and feel like in the future and is deliberately ambitious and aspirational. It has been informed and shaped by people and organisations across Scotland and is designed to reflect the diversity of people, homes and communities across urban, rural and island Scotland. The Principles underpinning the Vision explicitly include Gypsy/Travellers. [Housing to 2040](#) commits to more and better Gypsy/Traveller accommodation:

“To drive a significant improvement in the quality of sites going forward, we are developing a Site Design Guide for Gypsy/Traveller sites, in conjunction with residents and local authorities. This will set the standard for new accommodation, in keeping with the key principles such as accessibility and energy efficiency, which are important for all our homes. We will continue to work with Gypsy/Traveller communities to make sure their needs are embedded in housing and planning policy, including exploring ways to ensure that Gypsy/Traveller communities have access to support to allow them to self-provide accommodation that meets their needs.”

**More Homes Scotland Approach** - The Gypsy/Traveller Accommodation Fund sits alongside the Affordable Housing Supply Programme (AHSP) under the [More](#)

[Homes Scotland Approach](#), which aims to increase and accelerate the supply of homes across all tenures. It will support local authorities in delivering their affordable housing priorities by providing quality homes (but not houses) to Gypsy/Travellers.

**The Right to an Adequate Home** - The right to housing is already a human right enshrined in international law. The National Taskforce for Human Rights Leadership is working to establish a statutory framework for human rights that can bring internationally recognised human rights into domestic law and protect the human rights of every member of Scottish society.

The UNCRC Bill was passed by the Scottish Parliament on the 16<sup>th</sup> March 2021 and will make it unlawful for public authorities, including Scottish Ministers, to act incompatibly with the UNCRC requirements, giving children, young people and their representatives the power to go to court to enforce their rights which include civil, political, economic and cultural rights. The right to an adequate home is central to Housing to 2040 and commits to taking action to realise that right in Scotland.

[Out of Sight, Out of Mind](#), a report by the Northern Ireland Human Rights Commission in 2018 described the right to adequate housing for Gypsy/Travellers in terms of accommodation that is:

- culturally adequate;
- accessible;
- habitable;
- adequate in terms of services, facilities and infrastructure;
- subject to adequate security of tenure;
- adequately safeguarded from forced eviction;
- affordable;
- adequately located;
- subject to effective participation of Travellers;
- adequately monitored;
- adequately resourced;
- not subject to discrimination;
- promotes tolerance and mutual understanding; and
- subject to an effective remedy.

We recognise that Gypsy/Traveller communities face particular difficulties in realising the right to an adequate home that meets their needs and allows them to pursue their cultural traditions. This Site Design Guide and the Gypsy/Traveller Accommodation Fund are intended to help Gypsy/Travellers realise their rights.

**The Place Principle** - Place making is important for Gypsy/Traveller sites to ensure that the needs of residents are met. There is more information on this at [Place Principle: introduction](#)

[Creating Places: A policy statement on architecture and place for Scotland](#) sets out the six qualities of successful places as:

- distinctive;
- safe and pleasant;
- easy to move around;
- welcoming;

- adaptable; and
- resource efficient.

**National Planning Framework 4** - Scotland's fourth National Planning Framework (NPF4) will be a long term plan looking to 2045 that will guide spatial development, set out national planning policies, designate national developments and highlight regional spatial priorities. Draft NPF4 was published on 10 November 2021 and includes draft policies on the accommodation needs of Gypsy/Travellers within a wider Quality Homes policy. This draft policy suggests that land should be allocated to meet the Housing Land Requirement in sustainable locations that create quality places for people to live. The location of where new homes are allocated should be consistent with the principles of 20 minute neighbourhoods and an infrastructure-first approach. In rural and island areas, authorities are encouraged to set out tailored approaches to housing which reflect locally specific market circumstances and delivery approaches. Diverse needs and delivery models should be taken into account across all areas, as well as allocating land to ensure provision of accommodation for Gypsy/Travellers.

The draft policies for Gypsy/Travellers suggest that proposals for public or private, permanent or temporary, Gypsy/Traveller sites on land not identified for this use in the development plan should be supported where a need is identified unless:

- the proposed site relates to protected land or features and that the design of the proposal does not mitigate against any unacceptable impacts; or
- the proposed site cannot be adequately accessed and serviced; or
- there would be an unacceptable impact on the character, appearance or amenity of the area. Judgements should focus on the acceptability of the development being proposed.

The [Draft](#) is out for consultation to 31 March 2022. Resources, including access to a community grant scheme, can be found on the transforming planning website. Following the period of consultation and parliamentary scrutiny, the plan is for NPF4 to be adopted in summer 2022. It should be noted that NPF3 and Scottish Planning Policy will remain in force until NPF4 is adopted. Once commenced, the Planning (Scotland) Act 2019 will place additional duties on planning authorities. Work to prepare new guidance on effective community engagement is ongoing with a draft expected during 2022, alongside finalisation of the new regulations and guidance on development planning.

**Local Housing Strategies (LHS)** - Local authorities are required under the 2001 Housing (Scotland) Act to prepare a Local Housing Strategy (LHS) setting out the strategic vision for the delivery of housing and housing related services including the needs of particular groups such as Gypsy/Travellers. The LHS should be supported by an assessment of current and future housing requirements in the form of a Housing Need and Demand Assessment (HNDA). The HNDA is a primary element of the evidence base and its findings should help determine outcomes and inform policy and delivery priorities identified in the LHS. Through the accommodation actions in the Gypsy/Traveller Action Plan, research is planned for 2022 which should provide local authorities with a Toolkit for gathering evidence to inform the Housing Needs and Demands Assessment as part of the LHS and Development Plan process.

## Requirements Under the Site Design Guide

### 3. Consultation with Gypsy/Travellers and Other Stakeholders

#### 3.1 Consultation with Gypsy/Travellers

Sites will be most successful when they meet the needs of residents and these will vary from site to site. Site providers must consult with Gypsy/Travellers when designing a new site or undertaking refurbishment to an existing site and be able to provide evidence that they have done this. For existing sites, this will involve consulting directly with the residents on the site and potential residents, e.g. those on the waiting list or other Gypsy/Travellers living in the local authority area. For new sites, site providers should consult with Gypsy/Travellers living either permanently or temporarily in the area and groups who regularly travel in the area or have a family connection. Site providers should take into consideration the expectations and aspirations of Gypsy/Travellers, with a view to providing appropriate accommodation for that community. Consultation with communities should be initiated as early as possible in any proposed development to establish integration from first principles. This includes the strategic planning phase in order that communities are not merely reacting to decisions but are actively involved in proposing them.

The Site Design Guide should be used as part of consultative design process that seeks to put the views of Gypsy/Traveller communities at the core of the development process through which other design approaches may develop. [Research](#) by PAS (formerly known as Planning Aid Scotland) on behalf of NHS Health Scotland showed that having a sense of influence and control is particularly important in feeling a sense of belonging to a site. Gypsy/Travellers should be included in the process from beginning to end. During our conversations with Gypsy/Travellers, they have told us that this is very important. Ongoing communication and feedback on what is happening as a result of discussions is important throughout. If something cannot be included in a site design, for example because there is not enough space on an existing site or the cost is too high, then the reasons for this should be clearly explained. Including the community in design meetings with architects / site developers will help to ensure that assumptions are not made about what communities need and allows for issues and solutions to be discussed with the people who will be living on the site. It is important to consider the needs of everyone, as the needs of men, women and children may vary. Article 12 published [I Witness: The UNCRC in the United Kingdom - Young Gypsy/Travellers' Voices](#) which highlights the need to engage with young Gypsy/Travellers on what they think is important on a site. It is also important to consider the intersectional needs of those who share protected characteristics e.g. older people and people with disabilities, in keeping with equalities and other duties.

#### 3.2 Other Stakeholders

When a new site is being considered or work is likely to have a wider impact, site providers should also consult with other relevant stakeholders, including the settled community in the area.

PAS was funded by the Scottish Government to undertake substantial work aimed at ensuring that the specific needs of Gypsy/Travellers are considered and addressed by the planning system. This work culminated in a [series of guides](#) that are available on the PAS website. These guides provide valuable background information on Gypsy/Traveller culture and important context around issues such as human rights, equality and diversity. They are intended to facilitate informed engagement and understanding between Gypsy/Travellers, planning professionals, elected members and community councillors.

There can often be sensitivities around the location of Gypsy/Traveller sites. Site providers should engage with representatives of the local settled community about proposals in the early stages of the process. Consideration should be given to how to engage on the proposals – an informal approach where local residents/neighbours can give their thoughts in a more conversational manner may be more productive. Depending on the circumstances and the views of Gypsy/Traveller communities, consideration could be given to involving them in these discussions to try to break down barriers and build understanding. This could be facilitated through a third sector organisation that supports Gypsy/Traveller communities.

It may also be appropriate to consult other partners and agencies including: other local authority departments; neighbouring local authorities and; relevant agencies such as the Scottish Fire and Rescue Service (SFRS), Police Scotland and the local Health Board.

### **3.3 Methods of Consultation with Gypsy/Traveller Communities**

Methods of participation and engagement which are currently used by social landlords to inform and consult with their tenants and residents may be helpful in enabling Gypsy/Traveller communities to articulate the priorities of their families and communities, and to shape the services they receive in partnership with their landlord. The Scottish Government's [Guide to Successful Tenant Participation](#) sets out details and case study examples on participation and engagement methodologies, as well as practical information about the support and advice landlords may be able to offer to residents' groups. The [National Standards for Community Engagement](#) are good-practice principles designed to support community engagement, and improve what happens as a result. [Architecture & Design Scotland's Place Skills for Housing](#) provides some useful information on engagement including a section on how to engage others and templates for audience mapping and engagement plans.

Social landlords will be able to provide direct advice on establishing a local group, and can also provide information on any sources of support that may be available for establishing and running a residents' group, including details of grants, other available funding, and practical and informal support.

Traditional methods of engagement and participation may not be the preference of the residents on a site. However, we know that some local authorities have supported site residents to set up local groups. Talking to the residents or, in the case of a new site, members of Gypsy/Traveller communities will be crucial to establishing their preferred methods for engagement.

Ongoing, frequent, communication to maintain trust is important, for example ensuring that the results of the consultation are fed back to those who have been involved. Where it has not been possible to meet the expressed preferences of those involved the reasons for this should be clearly explained so people understand that their views have been listened to and considered. It is also important to keep in touch with residents over time, even if it is only to confirm that plans are still on track.

### **3.4 The Place Standard**

Satisfaction with a site is not just about the quality of the buildings on the site, as with settled accommodation, wider considerations about the quality of place and how it impacts on daily living, health and wellbeing must also be taken into account.

The Place Standard tool provides a simple framework to structure conversations about places that can aid understanding of these interconnected issues, give local people a voice and a role in influencing their future, and bring together all of the interests and resources within an area. This process of engagement and informed decision-making provides a strong foundation to address inequalities and improve the wellbeing of communities. Further information on the Place Standard Tool can be found at the [Place Standard](#) website. PAS has published a [report](#) on how the Place Standard tool can be used for Gypsy/Traveller sites.

Greenspace Scotland have developed a [Young Placechangers Toolkit](#) which aims to “inspire young people to take the lead in their local community, to voice their opinions and help make positive change happen” which may be helpful in engaging with young people on a site. Versions of the Place Standard tool for Children and Young People are being developed and will be published in 2022.

### **3.5 Participatory Budgeting**

Participatory budgeting (PB) is a way for people to have a direct say in how public money is spent in their community. The Scottish Government supports PB as a tool for community empowerment and to build on the development of participatory democracy in Scotland. This includes an intention to focus action on areas where people and communities are currently furthest from the ability to exercise power. PB helps deliver on outcomes in Scotland’s National Performance Framework that “we live in communities that are inclusive, empowered, resilient and safe” and “tackle poverty by sharing opportunities, wealth and power more equally”. It can also help meet the Public Sector Equality Duty, including the need to advance equality of opportunity by encouraging people with certain protected characteristics to participate in public life.

The [PB Charter for Scotland](#) is based on transparency and empowerment and helps good PB happen in a way that builds trust by giving communities real say over decisions that affect them. This gives a potential route for more empowering and decision making processes for the future. More information, resources and case studies are available at [the Participatory Budgeting Scotland](#) website.

## 4. Site Design – Permanent Residential Sites

### 4.1 Location

Current planning policy is contained in Scottish Planning Policy (2014). Development plans and the LHS should address any need identified, taking into account the mobile lifestyles of Gypsy/Traveller communities. If there is a need, local development plans should identify suitable sites. They should also consider whether policies are required for small privately-owned sites for Gypsy/Travellers. The community should be appropriately involved in identifying sites for their use. Once provisions are commenced, planning authorities will be required to consult with Gypsy/Travellers to inform the preparation of local development plans, as set out in the Planning (Scotland) Act 2019.

Sites identified in development plans should provide a suitable and safe environment for Gypsy/Traveller families and be capable of providing accommodation that meets their cultural needs. Plans should recognise that pitch requirements will vary considerably so policies will need to provide a range of accommodation options, in terms of both site type and geography. This offers a wider choice of accommodation and allows flexibility for different family groups.

Sites should be located away from areas which could be adversely affected by flooding or on or near land that would raise unacceptable amenity issues for people staying at the site. This would include refuse and industrial processes since these are likely to have a detrimental effect on the general health and well-being of the site's residents and may pose particular safety risks for young children. The Scottish Government's Principal [Policy on Placemaking, Designing Streets](#) and design tools, such as the Place Standard Tool, as outlined above, should assist in ensuring that identified locations will result in sustainable and well-designed places which meet the cultural and social needs of Gypsy/Travellers.

Among the key aspects to consider when identifying suitable locations are:

- **Roads and access:** safe and easy access for vehicles is important. Sites should be easy to reach from main roads, but usually not right beside them.
- **Water, sewage, electricity and digital connectivity:** sites need to be able to be supplied with all the essential services. There should be flexibility with regards to connections to public supplies and networks if self-contained solutions exist.
- **Access to public services and amenities:** the site should provide good access to public transport, schools, health services, shops and other community facilities.
- **Communal recreation and play areas** should be provided which are, in particular, designed and located with the safety of children in mind (taking account of the proximity of busy roads) and where they allow for natural supervision.
- **Impact on amenity:** any impact on the residential amenity of neighbouring properties should be proportionate.
- **Character and appearance:** the development can be made compatible with the character and appearance of the surrounding area.

When considering the above aspects, potential locations for Gypsy/Traveller sites should generally be considered inappropriate if they would be unsuitable for other residential developments. When considering likely impacts on the character and amenity of the surrounding area and properties, the judgements should be the same as they would be for residential housing. In preparing local development plans and allocating land that may be suitable for Gypsy/Traveller accommodation, planning authorities should take into account surrounding land uses to ensure that the community benefit from the same level of residential amenity and protection from environmental impacts and nuisances as other types of housing.

Gypsy/Travellers have told us that location of sites is often an issue because there are complaints from businesses or surrounding communities. People want some contact with the surrounding community but also able to be private and be a community themselves on the site. The edge of a town can work well, to be able to access facilities but also green space.

“Sites need to be separate enough to keep good relationships. They should be close enough and far enough away” Gypsy/Travellers, Consultation Event, August 2021

#### **4.2 Site Size**

There are currently a range of site sizes in Scotland. A number of factors should be considered when deciding the size of the site including the need identified in the HNDA and consultation with Gypsy/Traveller communities. Gypsy/Travellers traditionally live in family groups and feedback from Gypsy/Travellers and site providers suggests that smaller sites are preferable. Larger sites can result in unused pitches. 15 - 20 pitches is commonly regarded as an appropriate maximum size, although in certain circumstances a larger site may be required. Where larger sites are developed or extensions to sites are being considered, local authorities should consider the views of existing residents and the surrounding community, possible impact of the site on community cohesion, access to services and environmental sustainability etc.

The size of the site should be appropriate for the location and be big enough to accommodate shared facilities e.g. community space and visitor parking as well as the accommodation itself.

#### **4.3 Site Layout**

The process of designing a site and making the best of the space is likely to mean balancing layout, size of pitches and facilities needed by residents with the size and features of available land, e.g. there may be a trade-off between the size and number of pitches that can be provided whilst maintaining safe distances between units.

It is important to differentiate between communal space and individual pitches on the site. Site layout should balance privacy with enabling family groups to live close together.

In designing the layout of a site enough space must be provided to permit the easy manoeuvrability of the residents own living accommodation both to the site and subsequently on to a pitch.

Particular consideration should be given to the safety of children on sites, for example, clear lines of sight for vehicular traffic entering the site and in thinking about locations of play equipment and pavements to get around the site. This could include orienting amenity blocks so that windows overlook areas where children may play.

You can find example layouts of sites that are consistent with the Gypsy/Traveller tradition and culture, e.g. a tree branch layout or a circular layout in [Designing Gypsy and Traveller Sites](#) Guidance published by the Welsh Government. Example layouts for Scottish sites will be added to this Site Design Guide in due course.

Please also refer to section 6.8 on landscaping when considering site layout.

#### **4.4 Site Boundaries**

The site boundary should provide clear demarcation of the perimeter of the site. However, care should be taken to integrate the boundary of the site into the local environment. The aim should be to achieve a balance between securing the boundaries, ease of maintenance, maintaining a pleasant and more open environment and avoiding a feeling of enclosure. The use of informal green space may assist with this.

Site boundaries should be constructed in a way which will minimise the risks to children playing.

Site boundaries must comply with fire safety requirements. There must be a 3 metre gap between accommodation units and site boundaries – see section on Fire Safety.

Poorly defined boundaries may lead to unauthorised encampments or positioning of caravans in configurations that do not meet fire safety requirements. Different materials can be used to prevent this, such as planting, bollards or low walls. Where natural features exist it may be helpful to integrate these into the design of the site. Gypsy/Travellers have told us that trees too close to a boundary can bring wildlife too close to the site.

It is important that residents feel safe and secure on site without feeling isolated or enclosed. Any new site design should aim to limit the potential for crime using [Secured By Design Principles](#). Site providers should consult Police Scotland 'Designing Out Crime Officers' to ensure security and crime issues are addressed from the outset.

## 5. Permanent Sites – Accommodation

The majority of sites in Scotland are permanent. On many of them, the residents stay all year round, with the option of retaining their pitch and being able to travel for a certain number of weeks of the year. Other permanent sites also provide accommodation for families who do not stay on the site on a long term basis.

### 5.1 Seasonal Sites

In general, provision on pitches for seasonal sites should be the same as provision on a permanent site as people are living in the accommodation for months at a time.

### 5.2 Pitch Size and Hardstanding

Gypsy/Travellers have told us that current pitch sizes are often too small and that there is a need for accommodation that will meet the changing needs of a family over time. Families may grow or an individual may require a carer, resulting in the need for an additional caravan.

“Some people have big families that don’t want to live in the same caravan so would need more space for separate caravans.” Respondent to Online Survey, January – March, 2021

Pitches should be clearly marked.

“People want to be responsible for their own pitch and look after their own area.” Gypsy/Traveller, Consultation Event, July 2021

Pitches should:

- be of a suitable size for the planned use.
- allow adequate distances to be maintained between units to ensure fire safety is not compromised – see fire safety section (6.1) on distances between units.
- ensure a level of privacy and security for each household.

While single pitches may still be appropriate in some circumstances, the clear preference is for larger pitches that can meet the needs of a wider range of families and give them flexibility to have visitors and meet changing needs over time. No site should contain only single pitches.

Gypsy/Travellers told us that people want enough space for:

- family to come to stay.
- older children or other relatives to be able to live alongside, either on the same pitch or another pitch on the site.
- separate accommodation for boys and girls.
- to be able to park their vehicles on the pitch.
- to be able to put mobile homes, which are larger than caravans, on to pitches.

Some Gypsy/Travellers have told us that they would like a washing line/laundry drying area on their pitch.

It should be clear to residents what the capacity of a pitch is in terms of caravans and vehicles. For the purposes of this Site Design Guide, we would define pitches as:

**Single pitch and amenity** - enable at least one caravan and car or van/light commercial vehicle to fit on the pitch (current minimum standard) or;

**Double pitch and amenity or larger** - enable two caravans and two cars or vans/light commercial vehicles to fit on the pitch (Gypsy/Travellers have told us that this should be the standard size of a pitch) or;

**Pitch and residential mobile home** - be suitable for a residential mobile home plus a car and/or light commercial vehicle or;

**Extended pitch and residential mobile home** – including amenity and/or space for additional caravans and vehicles (more space is required for larger families, who for example, may need space for 3 caravans and 3 cars).

Every pitch must provide hard-standing or a solid base which is capable of tolerating the weight of the number of caravans/mobile homes (and their contents) and vehicles outlined in the capacity of the pitch. For residential mobile homes the base must extend over the whole area occupied by the mobile home and must allow enough space for residents to enter and leave and move around the pitch safely. The orientation of residential mobile homes or buildings on the pitch should also take in to account how they will be used and safety in coming and going.

The vast majority of Gypsy/Travellers who responded to the online survey told us that they would like space to be provided beside the residential mobile home for a caravan to enable them to still go travelling or to provide additional sleeping accommodation if required.

“Having a tour trailer would be really important for my family so that we can still shift. Furthermore, we would want to have the space for a small caravan for our older girls/boys to stay in once they get too old to stay in the main chalet.” Respondent to Online Survey, January – March 2021

The hardstandings must be constructed to the industry guidance<sup>1</sup> current at the time of construction and kept in a suitable condition with any necessary maintenance. Paved areas and hardstandings larger than 50m<sup>2</sup> are subject to [building standards](#). Where possible electrical hook-up points for caravans should be detached from the main utility building and located as close as possible to the caravans to avoid long or trailing leads. Suitable anchor points should be provided, if necessary.

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<sup>1</sup> New hardstanding bases should be laid as a minimum to provide “A hard core base to a minimum depth of 150 mm, well consolidated and topped with 100 mm of concrete (mix as BS8500-2:20066 ) shall be used. The finished raft must be generally level with due allowance for surface drainage. Where the ground conditions so require, thickening or the introduction of reinforcement of the raft may be necessary.” Current National Park Homes Council and British Holiday and Home Parks Association Standards

### **5.3 Amenity Block**

The amenity block should feel like an extension to the residents' home and should therefore provide accommodation that is warm, comfortable and meets the needs of the occupant. Requirements may depend on other provision on the sites, for example amenity blocks are likely to be smaller or may not be required if a residential mobile home is provided on the pitch.

Many of the Gypsy/Travellers we spoke to told us that living space in the amenity block is now a priority. This is partly to accommodate family life and partly so that they can spend time there in the day, heating one space rather than moving between the caravan and the kitchen.

“Bigger amenity blocks are needed for sitting in and having visitors. A kitchen diner would work well. We like the layout in other sites where family have space for a TV, sofa and table and chairs in the living area. So that the children can play while someone is busy in the kitchen. Families are large and eat together.” Gypsy/Travellers, Consultation Event, August 2021

Subject to the views of residents and space available, amenity blocks should include the following facilities:

- Kitchen
- Bathroom
- Flexible living space, for example an area for dining
- Storage space

Some feedback suggests that if living space is provided, this may be used for sleeping overnight on occasion. If this is considered likely then the amenity block should be designed and specified accordingly. Sleeping in the amenity blocks has implications for fire safety requirements and therefore the requirements for living space should be discussed with residents at the start of the design process. If the views of residents indicate that they would like some living space and that it may be used for sleeping then the amenity block should be designed with that intent built in. This should be continually monitored and reviewed as part of the fire safety risk assessment process to ensure any changes to initial designs can be considered appropriately.

Gypsy/Travellers have told us that it is inappropriate for a bathroom to open directly into the kitchen/living space area.

### **5.4 Residential Mobile Home (Chalet)**

In some cases, residents and local authorities may decide that residential mobile homes are the best option. As a minimum, these should be constructed to meet BS 3632: 2015 Residential Park Homes: Specification. Mobile homes provided must be residential, suitable for occupation as a permanent home all year round, not a caravan holiday home constructed to meet BS EN 1647.

BS 3632 sets the minimum requirements and not the targets, therefore, in order to future proof residential mobile homes and meet the intention of Housing to 2040 or to prolong their useful life, there may be some elements of BS 3632: 2015 that should have the minimum requirements exceeded.

Ideally residential mobile homes provided should be capable of achieving an EPC rating of B or C, - see section on fuel poverty (5.8), however an EPC rating can only be provided for a residential mobile home once it has been situated on the site as some of the elements of the calculation are site dependent.

It may be helpful to look for a guarantee of compliance with BS 3632. For example, National Caravan Council (NCC) member manufacturer's homes carry an Approval Badge and Certificate. This signifies that the home has been inspected and approved through the NCC Manufacturer Approval Scheme as complying with BS 3632. If compliance with BS 3632 cannot be verified then the home may not be suitable for residential use.

The NCC also operate an energy efficiency rating scheme which helps to gauge the energy efficiency of a residential mobile home built by a NCC member manufacturer. A rating label is attached to the home (in the front window and placed in the user's handbook) and is a visible indicator of the degree of efficiency achieved by a particular model.

The NCC Energy Rating Scheme is designed to give purchasers of a residential mobile home built to BS 3632 an indication of the likely energy consumption and Carbon Dioxide emissions of the home they are considering purchasing. The NCC have produced a [leaflet](#) with more details of the scheme. A rating for a home will typically be between 250 and 120, the lower the number the better the rating. If a residential mobile home only met the very minimum requirements in BS 3632 and had less efficient energy systems installed, then it would likely have an energy rating of somewhere between 400 and 300. Energy efficiency is clearly an area where BS 3632 should be exceeded for residential mobile homes purchased by local authorities for Gypsy/Traveller sites. We would like to explore through the demonstration projects what the minimum energy efficiency rating should be.

In terms of u-values, the British Standard is set at a lower value than building standards, due in part to limitations on the thickness of the walls while ensuring that the home remains movable. For this reason, ensuring the highest possible specification for insulation is important. BS 3632 is currently under review and increases in u-value requirements and the improvement of vapour control requirements to manage condensation are likely as a result.

Residential mobile homes purchased by local authorities should not be larger than the maximum size of a caravan permitted by the Caravan Sites Act 1968 (Amendment of Definition of Caravan) (Scotland) Order 2019.

Architecture and Design Scotland's report, [Using Offsite Construction for Housing Delivery in Scotland](#) provides a case study on developing a residential mobile home using offsite construction. Using offsite construction may have potential to reduce the amount of time that residents need to vacate the site.

Some Gypsy/Travellers may want to buy or rent a residential mobile home to put on their pitch. Where practical, local authorities should support this.

## **5.5 Permanent Housing Designed for Gypsy/Travellers**

South Ayrshire Council has built permanent housing configured to meet the needs of Gypsy/Travellers. This type of development will be required to meet standards for new build social housing as set out in sections 1.4 and 1.5 of this [guidance note](#) on the Affordable Housing Supply Programme.

## **5.6 Building Standards**

Amenity blocks are not currently classed as domestic properties for building standards purposes. This is because they are not considered to be dwellings as they are not designed to provide sleeping accommodation. However, the amenity block is seen as an extension of the resident's home and should be built to the same standards as mainstream social housing in terms of fixtures and fittings. The intention is that amenity block provides accommodation that has the look and feel of a domestic property. As the final design of amenity blocks will be subject to the views of residents and may include living space in them, the classification of the amenity block for building standards purposes should be considered as part of the design and development process.

Energy efficiency of amenity blocks needs particular consideration due to the risk of fuel poverty for residents. The standard applied for energy efficiency in new domestic dwellings under building standards is higher than that for non-domestic buildings. Fire safety requirements are also different depending on the intended use of the building, for example, if sleeping is permitted then different building standards apply with regard to communication requirements to alert residents in the event of a fire. When submitting an application for building warrant under building standards, specification to a higher standard than building regulations on specific topics such as energy efficiency should be considered where identified as relevant to the delivery of the level of amenity or safety sought.

Local authorities are appointed by Scottish Ministers as verifiers to administer the building standards system for their own geographic area and are responsible for the interpretation of building regulations. Where the building regulations apply to proposed work, a building warrant is required before work can start on site. The relevant local authority verifier should be consulted to discuss the specific details of each project. The [building standards](#) website contains all relevant building standards, legislation and guidance.

Under the Heat Networks (Scotland) Act 2021 persons with an interest in non-domestic building will be required to carry out a building assessment report which looks at the potential for buildings to be supplied with thermal energy by means of a heat network and an assessment of the period any heating system will operate effectively and efficiently for. The Scottish Government is currently considering regulations and guidance for this requirement.

The Site Design Guide references the building standards in place at the time of publication, these will be subject to updates and projects should comply with the relevant building standards in place at the time a project takes place.

## **5.7 Decarbonisation**

In keeping with the pathway to net zero set out in the Heat in Buildings Strategy, new buildings and heating systems for Gypsy/Traveller sites will be required to use zero direct emissions heating, and also feature high levels of fabric energy efficiency to reduce overall heat demand so that they do not need to be retrofitted in the future. There is no single technology that will deliver zero emissions heating in Scotland; the most cost-effective pathway will require several different approaches. The key low and zero emissions heating solutions available today are heat pumps and heat networks where the energy or heat source is low or zero emission. Under the Heat Networks (Scotland) Act 2021 applications for a heat network licence will need to show how the applicant will operate a network in a manner that minimises greenhouse gas emissions and contributes to meeting fuel poverty targets, amongst other things. The Scottish Government is currently considering regulations and guidance for this requirement.

The New Build Heat Standard will require any new building that applies for a building warrant from 2024 to use a zero direct emission heating system. A scoping consultation on this policy was carried out in early 2020, and an [analysis report](#) of the responses to this consultation has now been published. This work will help to inform the development of the Standard - which will continue throughout 2021-22.

Site designs should consider the 8 principles of a carbon conscious place as outlined in the [Designing for a Changing Place Report](#) by Architecture and Design Scotland.

## **5.8 Energy Efficiency and Fuel Poverty**

Feedback suggests that some existing amenity blocks are cold, difficult to heat and prone to condensation. The energy efficiency and heating method for amenity blocks or residential mobile homes will impact on affordability of heating and on the risk of fuel poverty for residents. Gypsy/Travellers have told us that low cost heating is a priority.

“At the moment the amenity block is impossible to heat because you are in and out between it and the caravan all the time, letting heat out. There are 2 spaces to heat – amenity block – gas, electric or infrared and the caravan – gas. So double the costs. If the amenity block had living space, people would be in it through the day and it would warm up.” Gypsy/Travellers, Consultation Event, August 2021

In deciding on heating for amenity blocks and residential mobile homes, consideration should be given to the potential impact on running costs and therefore the affordability for residents. Where action is being taken to decarbonise the heat supply, the approach taken should ensure that running costs are not unaffordable for households in or at risk of fuel poverty.

The Gypsy/Traveller Action Plan includes a commitment on fuel poverty and lived experience research with community members. Due to the impact of COVID-19 restrictions, we have had to delay this work and we will aim to carry this research out in 2022. The outcomes of this research will feed into the first review of the Fuel Poverty Strategy in 2024.

As set out in our [Heat in Buildings Strategy](#) , we want our homes to be as energy efficient as possible, meeting a minimum standard equivalent to EPC C at least, where technically feasible and cost-effective, by 2033.

Through our national and area-based delivery schemes, we want to see the homes of those in fuel poverty improved so that they reach an energy efficiency rating equivalent to EPC C by 2030 and equivalent to EPC B by 2040

For a number of reasons the RdSAP methodology used for calculating dwelling EPC ratings is not appropriate for amenity blocks so there is no current method for setting an energy efficiency standard for these buildings. We are considering whether the RdSAP methodology could be modified or whether a heat loss calculation should be developed to do this in future. In the meantime, attention should be paid to the specification of materials to deliver low levels of heat loss, consistent with or better than that required in social housing.

Residential mobile homes can be assessed for an EPC as a dwelling using RdSAP. When procuring residential mobile homes, site providers should bear in mind the future targets for EPC ratings. We would like to test how achievable this is through the demonstration projects i.e. by seeking to provide residential mobile homes with an EPC rating of B or C.

The issues around measurement and standards for energy efficiency will be considered further through the demonstration projects.

## **5.9 Accessibility**

**Housing for Varying Needs** - The aim is to provide equivalent provision for those with varying needs living on Gypsy/Traveller sites to that in the settled community. Housing for Varying Needs is a detailed, technical design guide, which comes in two parts. Part 1 of the guide covers self-contained houses and flats and includes for the provision of property for general needs, older people, ambulant disabled people, wheelchair users and other specific needs. Part 2 of the guide covers housing with integrated support, including the provision of communal facilities such as staff accommodation, guest bedrooms and rooms for special services where required.

As a minimum, newly designed pitches and amenity blocks will be expected to meet the relevant basic requirements of the Design Criteria for dwellings in general to suit varying needs specified in Housing for Varying Needs. This will exceed provisions set in building standards on some topics.

This includes the applicable criteria for: access to individual dwellings; entrance doors to individual accommodation; circulation spaces and internal door; living

space; storage; kitchen; bathroom; windows; heating and water services; and power and communications.

In order to meet the needs of a range of residents over time, a proportion of new or refurbished accommodation should be configured to meet the needs of older and ambulant disabled people.

Gypsy/Travellers have told us that accommodation should be “designed to suit different needs such as disabled, elderly.” (Respondents to Online Survey, January – March 2021)

Like mainstream social housing, local authorities should assess the needs for their area. The most common target for this type of provision is 10%, however, given that the 2011 census reported that Gypsy/Travellers are more likely to have a long-term health problem or disability, the level of provision may need to be higher than for the settled community.

Providing accommodation with full wheelchair accessibility should be considered in accordance with identified need for a specific tenant. The pitch and amenity block should be designed for full wheelchair accessibility, meeting the relevant design criteria within Housing for Varying Needs.

The Scottish Government are leading a review of Housing for Varying Needs, with completion due by March 2023. The updated guide aims to provide advice to promote improved design, accessibility and adaptability to better meet peoples' needs, at minimal additional cost to the public purse.

**Adaptations** - Residential mobile homes can be built to provide for accessibility needs e.g. wider doors or re-enforced roof trusses for hoists, without significant additional cost if these are specified in advance. Retrofit can be more costly. As set out in Housing to 2040, the Scottish Government is looking to streamline and accelerate the adaptations system to take action to reduce the time it takes to apply for and receive support and maximise the available resources. This will review terminology and definitions which currently mean that the caravans and mobile homes are not considered as a house and as such are prevented from receiving scheme of assistance to help pay for adaptations.

**Other Considerations** - As with settled accommodation, it is also important to consider other issues facing Gypsy/Travellers in the design of accommodation. For example, with an increasingly elderly population, the needs of those with dementia should be taken into account. The Royal Town Planning Institute have produced an [advice note](#) for creating better environments for people living with dementia which includes a section on housing design. Consideration should also be given to any requirements for accommodation for someone with autism.

## **6. Permanent Sites – Facilities and Amenities**

### **6.1 Fire Safety**

New sites and site buildings should comply with building standards in relation to Fire Safety, including:

[Standard 2.12](#) – Every building and pitch must be accessible to fire and rescue service.

[Standard 2.13](#) – Every site must be provided with a water supply for use by the fire and rescue service

Once building work is complete, ongoing fire safety obligations are imposed on Duty Holders by Part 3 of the Fire (Scotland) Act 2005 (the 2005 Act) and supporting regulations. In the case of Gypsy/Traveller sites provided by local authorities or RSLs, the Duty Holder is the local authority or RSL providing the site. Gypsy/Traveller sites are considered to be “relevant premises”, so are covered by the 2005 Act and supporting regulations.

A mobile home or caravan which is used by someone as their residence, whether as owner or tenant, will be “domestic premises” and not “relevant premises” (and so are not covered by the 2005 Act). The pitch however, will be subject to the spacing requirements to meet the appropriate fire safety measures preventing fire spread between pitches. This must be considered within the fire safety risk assessment.

### **6.2 Fire Safety Risk Assessment**

A pre-occupation appraisal of fire safety is recommended to ensure the site is fit for occupation and that appropriate physical fire safety measures are in place. Once the site is operational, this should be followed by a full Fire Safety Risk Assessment (FSRA) in accordance with Part 3 of the Fire (Scotland) Act 2005 and the Fire Safety (Scotland) Regulations 2006. The FSRA should be carried out by a competent person with appropriate skills, knowledge, experience and behaviours. In this respect, the Scottish Fire and Rescue Service, as the Enforcing Authority of the aforementioned legislation, cannot undertake the role.

All other “relevant premises” within the site (under the Fire (Scotland) Act 2005), should be subject to an FSRA. These may fall under different uses, for example offices.

It is important to know whether an external fire risk assessor is competent but this might be difficult to ascertain. Using registered or third-party certificated assessors to carry out fire safety risk assessments is one way to establish competence. The Scottish Government and SFRS recommend selecting a person or company that is third party certificated by a United Kingdom Accreditation Service (UKAS) accredited Certification Body or an assessor registered with a recognised Professional Registration Scheme. SFRS maintains a list of UKAS and other recommended schemes on its [website](#). SFRS has not assessed and does not endorse individuals or companies participating in these schemes but assessor participation can offer a degree of assurance that individuals or companies have met certain professional

requirements. Simply operating in the fire sector or having previous fire service experience is no guarantee of competence.

Guidance on caravan sites can be found at annex 3 of [Practical Fire Safety Guidance For Existing Premises with Sleeping Accommodation](#) which sets out the following benchmarks in relation to spacing and car parking:

- Subject to variations, the distance between any two units should generally be not less than 6 m for permanent residential sites.
- The 6 m distance between units may be reduced where caravan construction is inherently fire-resistant. Under such circumstances, the distance may be reduced to 5 m. Where there is a mix of fire-resistant and non fire-resistant construction, the larger separation distances apply.
- The distance from any part of a tent or caravan to any site road should be not less than 2 m, and not less than 3 m from any site boundary.

Chapter 5 of the above guidance provides general guidance on the use and storage of liquefied petroleum gas (LPG). For buildings, standard 4.11 of the [building standards](#) also applied to tanks and cylinders supplying fixed appliances.

### **6.3 Access to Internet and Broadband Services**

Fibre broadband should be considered as being the equivalent of a utility service and site providers should be able to show that they have taken account of current and future digital services or installation needs. This is particularly important as more services and education are delivered digitally. Installations and delivery options should take account of how residents will use the service. For example, occupancy periods may not be long enough for residents to take out their own contract so consideration could be given to inclusion of Wi-Fi costs in pitch fees. As a minimum:

- Potential for a private connection should be provided to each pitch/amenity block so that residents can take up their own contract; and
- Free Wi-Fi should be provided in community meeting facilities.

Gypsy/Travellers have told us that being able to access the internet is important to them to access essential services and education and to be able to work. However, some would use free Wi-Fi while others would want to be able to control their own contract.

### **6.4 Roads**

In line with [building standards \(2.12 fire and rescue service access\)](#) roads must be designed to provide adequate access for emergency vehicles. Routes for emergency vehicles must be kept clear of obstructions at all times. Where necessary, suitable vehicle turning areas should be provided.

Roads must:

- not be less than 3.7 metres wide.
- be constructed of hard durable materials (such as suitable bitumen macadam or concrete with a suitable compacted base) and must be provided so that no mobile home or caravan is more than 45 metres from a road.

- be capable of carrying vehicles with an axle loading of 14 tonnes as a minimum.

All gateways/entrance/exits to the site must be a minimum of 3.5 metres wide and have a minimum height clearance of 3.7 metres for vehicular access and be accessible at any time.

Dead end route - fire and rescue service vehicles should not have to reverse more than 20 metres from the end of an access road. Where any dead-end route is more than 20 metres long, turning facilities should be provided.

The site should be designed to try to control the speed of vehicles, where appropriate, suitable additional measures (e.g. signage or speed bumps) should be provided.

## **6.5 Footpaths**

Gypsy/Travellers have told us that footpaths or pavements on a site are essential so that people, especially children, can walk safely between pitches. Suitable paths should be provided to allow safe pedestrian movement around the site.

The surface of paths must be hard, firm, even and slip resistant; cobbles and setts should be avoided. Manhole covers, gratings, etc. must be flush with the surrounding surface and any grille bars should be set at right angles to the direction of travel. Paths should be provided with a drainage system to remove surface water from paved surfaces such as access routes.

Where accommodation is provided for disabled and wheelchair users, the appropriate requirements should be met. To comply with Housing for Varying Needs, footpaths should generally have a minimum width of 1800 mm, but a minimum of 1200 mm is acceptable for short lengths or in paths leading to no more than four pitches.

## **6.6 Drainage**

All underground drainage within the site servicing buildings/pitches will be subject to building regulations [standards 3.6 to 3.9](#)

## **6.7 Fencing**

Gypsy/Travellers have told us that they prefer fencing and gates around individual pitches, so that children can't wander on to the road and so that they can look after their own space. Where appropriate, gates should be sliding instead of hinged to allow for vehicle access and to save space.

In order to facilitate residents changing the caravan accommodation they own the use of moveable fencing and gates could be considered.

There should be no impact from fencing on visibility which may cause potential road safety issues, for example at pitch entrances/exits.

Any fencing proposals should ensure that appropriate distancing is maintained and the fence itself does not contribute to fire spread between units.

## **6.8 Landscaping**

Housing to 2040 recognises the importance of quality green space. Landscaping and green space on a site is important to residents. These aspects of the design of a site are just as important as meeting the necessary standards.

Gypsy/Travellers have told us they would like to see “green space/garden for planting so that the pitch is not all concrete” and “less steel, less concrete and more of a softer nature in design”. Respondents to Online Survey, January – March 2021

Site landscaping that provides a mix of durable, paved areas with some good quality, natural landscaping - grassed areas, shrubs and trees should be provided. It should be clear who is responsible for looking after green spaces to make sure that they are well kept.

Appropriate landscaping could be used as a means of avoiding the unintended use of spacing left to meet fire safety requirements.

[Scottish Natural Heritage's report on maximising the benefits of green infrastructure in social housing](#) should be considered.<sup>2</sup>

## **6.9 Cultural and Artistic Features**

Art and design could be used to celebrate culture and history on a site. Responses to the online survey told us that some sites are not welcoming, homely places with too much concrete and steel. Artistic features along with softer landscaping may help to address this.

## **6.10 Play Parks / Communal Outdoor Space**

A safe communal recreation / play area for children of all ages is required on sites where suitable provision is not available within reasonable walking distance from the site on a safe route. Play areas should be designed in consultation with children and parents. This [toolkit on improving play opportunities](#) by Play Scotland may be useful.

Gypsy/Travellers have told us that it is important that children can be seen where they are playing, it may be appropriate to provide green space between pitches

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<sup>2</sup> For the purposes of Scottish Natural Heritage's report, green infrastructure is defined as: ‘*The use of greenspaces and any vegetated land or water to deliver benefits for people and nature. GI includes parks, open spaces, playing fields, woodlands, wetlands, floodplains, road verges, allotments and other growing spaces, private gardens, green roofs, green walls as well as blue infrastructure such as sustainable drainage systems, ponds, swales, raingardens, wetlands, rivers and canals*’.

where families could put out their own play equipment and keep an eye on the children if it is not possible to locate a play park near enough to the pitches to enable the children to be seen. The area allocated for children's play must take into account the number of children it has to accommodate. [Fields In Trust](#) have guidance on designing play parks.

[Learning through Landscapes](#) provides information on enhancing outdoor learning and play for children. While predominately school focused, they provide some useful resources.

Play areas should be located away from vehicular traffic and should be inaccessible to vehicles. In addition they should be fenced, walled or grassed embankments and clearly delineated as a play area. Play areas should be well lit and designated as dog free areas.

Consideration should be given to the provision of other outdoor communal space, as part of the prioritisation of available space.

This could be used for playing or “to pitch a tent and gather to pass on traditions.” Gypsy/Traveller, Consultation Event, July 2021

### **6.11 Community Meeting Facilities**

The majority of those consulted believed that a community facility should be provided on sites. Some uses of a community building that have been suggested are: outreach and support work, youth clubs, space for playing music, playgroups, quiet space for children doing homework or tutoring in private, adult education, a community larder, early years' sessions or health clinics.

Community meeting facilities should meet the appropriate building standards and be accessible to disabled people and wheelchair users.

Free Wi-Fi should be provided in community meeting facilities.

### **6.12 Mail**

Residents should have access to their own secure mailbox per pitch which can only be accessed by them. Feedback from residents during the COVID-19 pandemic has highlighted that it is inappropriate for site residents to be required to collect their mail from the Site Manager's office. Other arrangements may need to be made for larger items.

### **6.13 Utilities Account**

Some existing site residents have expressed a preference for their own utilities account. Site design and utilities provision should accommodate this unless residents request a different arrangement. Some Gypsy/Travellers have told us that paying through the local authority is cheaper and that residents have opted to stay with this arrangement. A possible disadvantage of local authority provision is access to top ups out of hours, e.g. if the site office is closed. If utilities provision is through

the local authority then access for top ups needs to be suitable to meet the needs of residents.

#### **6.14 Office Space**

The provision of office space will depend on the particular circumstances of the site. A site manager who is present on the site every day may be particularly important on larger sites and an office will be required in these circumstances.

The site office should be located close to the entrance to the site and provide space where the site manager can have confidential discussions with site residents or visiting professionals.

#### **6.15 Work Space**

[Research by PAS and the NHS](#) noted the potential need for space for Gypsy/Travellers to work or pursue a trade/business and to be able to pass skills to the next generation.

Depending on the circumstances of the site, consideration should be given to providing workspace and/or storage for materials for residents. Some Gypsy/Travellers have told us that space on the pitch is more important than a separate work area, e.g. to store tools.

“Work storage could be provided in the amenity blocks – tools need to be stored on the pitch to make sure that they are secure.” Gypsy/Traveller, Consultation Event, August 2021

If separate manual work space is required this should be on a segregated part of the site or on adjacent land. Residential pitches should be for residential purposes only and potentially hazardous activity on pitches should be discouraged. Residents should be supported to undertake non-hazardous home working, such as teleworking within the residential area of the site, this may take the form of flexible communal space.

Site Design Guides in other parts of the UK suggest that grazing land for animals should be provided. Grazing land has not been identified as a priority through the online survey or discussion with Gypsy/Travellers but this should be discussed with residents.

#### **6.16 Site Security**

Gypsy/Travellers have told us that security is a priority. Installing a site entrance barrier or CCTV could be considered. However, this should only be installed after consultation with site residents and after balancing the potential impact on wider community cohesion. An entrance barrier may make site residents feel safer whilst alienating the surrounding community. Local authorities should consider the need for emergency services to access the site if a barrier is proposed. Any CCTV should be focused on the entrance to the site rather than individual pitches. Site design should take into account [Secured By Design Principles](#).

## **6.17 Car Parking**

Space for residents parking is covered under pitch size and the number of vehicles allowed per pitch.

While parking on the pitch is preferable, additional parking may be required for residents and visitors. If this is the case, it may be better to provide several smaller parking areas in view of pitches rather than one larger detached area.

The number of spaces should reflect the size of the site and the needs of the residents.

## **6.18 Lighting**

There must be adequate common or public lighting on the site for safety and security purposes. Residents should be able to move about the site safely at night, both as pedestrians and drivers. Using standard residential street lighting specifications may not be appropriate as this may result in lighting that shines directly into caravans or amenity blocks. Care is needed when designing lighting that balances privacy with security.

## **6.19 Waste Disposal**

Arrangements for domestic waste disposal should be in keeping with those for the settled community. Individual pitches should be provided with suitable containers for domestic refuse in accordance with the local authority arrangements rather than communal bins. The site design should allow enough space for refuse collection vehicles to reach an appropriate point from which waste can be collected.

## **6.20 Site Name**

The site name is an important element in the identity of the site. Gypsy/Travellers have experienced issues with accessing services and employment because their address identifies them as a Gypsy/Traveller. Some residents have chosen to change the name of their site to a residential street name while others have decided that it is important that the site retains the original name. All views should be taken into account through consultation with residents to ensure an appropriate name is chosen.

## **6.21 Electric Vehicle Charging**

The installation of ducting infrastructure for electric charge point connectors should be included, to be able to provide for charging when needed in the future.

## **6.22 Maintenance and Management of Sites**

Provision should be made for maintenance of sites from capital programmes to ensure that they are maintained at a good standard. Management of the site is a key area for consideration to ensure that standards on sites are maintained over time and that they become embedded in the community. The usual methods of

maintenance and management for social housing may need adjustment and this should be considered at planning stage.

Gypsy/Travellers have told us that how the site is managed is very important e.g. making sure people keep to site rules and that maintenance and repairs are carried out on time.

## **7. Site Design – Transit Sites**

COSLA launched a 12 month Negotiated Stopping Pilot in September 2020 which focused on a public health and human rights-based approach in the context of the pandemic. Research and evaluation has been built into the pilot to inform future provision and increase quality of life and access to services for Gypsy/Travellers living roadside. The work of local authorities involved in the pilot will be promoted and shared for consideration of learning and the applicability of the model in other local areas.

While the Negotiated Stopping Pilot is one way to improve services for Gypsy/Travellers living road side, a high number of unauthorised encampments and other evidence from community views may indicate a need for site provision in the area. Local authorities should also consider whether there is sufficient traffic to suggest that a transit site is needed, e.g. in order to balance the needs of Gypsy/Traveller communities with those of the settled community. The provision of temporary stopping and transit sites should be considered through the HNDA and LHS process and may involve discussions with neighbouring authorities to look at wider patterns of travel. Transit and temporary stopping place provision and the standards required varies in other parts of the UK. Requirements for provision of facilities on transit sites and stopping sites may differ between areas, for example depending on the typical duration of stay or other facilities available in the area. Local authorities should assess what is required drawing on the evidence, including discussions with members of the community who travel through the area and local residents, to ensure their needs are met.

Temporary stopping and transit sites are likely to need to be situated closer to major transport links to facilitate travelling. Proximity to ferry ports and major road networks may also be an important consideration when planning site locations.

It is not recommended that transit pitches are provided alongside permanent pitches as this may result in disruption to residents.

“A mixed transit/residential site would be unlikely to work well. People would rather not live permanently on a site which is part transit due to the turnover on transit pitches.” Gypsy/Travellers, Consultation Event, July 2021

However, there may be instances where a site includes both types of pitches and this should be taken in to account in the site layout, for example by separating the different types of provision in to different zones.

Local authorities should consider, through consultation with members of the community who frequent the area what type of site is required. Some

Gypsy/Travellers told us that transit sites can become semi-permanent if there isn't permanent accommodation in the area, as people choose to stay longer. It therefore needs to be clear that it is transit rather than permanent facilities that are needed and that the right facilities are provided.

The size of transit sites should balance the need to keep travelling families together on the site whilst ensuring effective management and maintenance.

The layout of pitches should ensure that the separation distances between caravans required for fire safety purposes can be observed.

## **7.1 Amenities**

As a minimum, on a transit or temporary stopping site, each pitch should have:

- an electric point
- a toilet, portable if necessary
- access to water for sanitation and laundry
- waste disposal facilities

Responses to the online survey have told us that these are the basics that are required, however more substantial accommodation may be appropriate. Any shared facilities should have fully segregated male and female toilet or shower facilities with hot and cold water supply.

It is recommended local authorities provide on-site or adjacent parking/storage areas to ensure site occupiers are able to travel for economic purposes.

## 8. More Sources of Information

- Link to planning documents for refurbishments of North Cairntow site in Edinburgh [19/03264/FUL | Reconfiguring of Travellers site and office with 20 new static homes Removal of amenity blocks and replacement of combined gardeners toilet, utility space & meter enclosure; Erection of new fencing and formation of new visitor parking spaces \(as amended\). | 1-24 North Cairntow Edinburgh EH16 4AX](#)
- Managing and delivering Gypsy and Traveller sites: negotiating conflict. Richardson, J & Codona, J [JRF CIH Gypsies Travellers final \(dmu.ac.uk\)](#)
- Providing and managing sites for Gypsies and Travellers webinar – National Housing Federation
- Places We're Proud Of – publication includes a number of case studies and photos of recent developments. [Places We're Proud Of \(1\).pdf](#)
- Scottish Government [Gypsy/Travellers - accommodation needs: evidence review - gov.scot \(www.gov.scot\)](#)
- Results of the online survey (January – March 2021) of Gypsy/Travellers on their priorities for accommodation are available on request

**During our discussions with Gypsy/Travellers over summer 2021 we showed them some pictures from [Places We're Proud Of](#). Below are some of their reactions:**

People really liked this design of amenity block because its open plan and the windows give a good view out and all around, like being in a caravan. They would have liked a fence to make it clear where the pitches start and end. People didn't like the gravel because children will play with it.



The picture of the communal space with the boat in the centre of it looked ideal as everyone could see the children playing, they have space to run about and something to play on.



People liked the gates on the pitches, to keep children safe. Also the size of the pitches and green space. Sliding gates are more practical for space.



Green space is positive but people would have liked more space on these pitches for extra caravans. There was some concern that the wooden fence could be a fire risk.





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