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Design Guide for Travellers' Sites in Northern Ireland

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Introduction

Purpose

This guide is intended to support the provision of appropriate, cost effective site facilities for Travellers living in Northern Ireland. It seeks to outline the key issues, including the relevant planning context, that could be considered and identify the main design and management elements necessary to create high quality and sustainable Traveller sites which meet residents' traditional and cultural needs.¹ However the issues are complex and there is no single 'one size fits all' Travellers' site.

It is therefore not the intention of this guide to impose uniform solutions. Decisions around the provision of Traveller sites should be taken on a case by case basis taking into account local circumstances such as the development requirements, geographical and other characteristics of the site (or potential site). For this reason it is recommended that early and regular consultation with all relevant stakeholders is a crucial element in getting the design right from the outset.

The previous [Design Guide for Travellers' Sites in Northern Ireland](#) was published by the then Department of the Environment for Northern Ireland (DOE (NI)) in 1997. Since

then the key development was the transfer of all Council owned sites to the Housing Executive. This new version of the guide has been produced to reflect that change.

Background

In 1999 the DOE [New Policy on Accommodation for Travellers](#) recommended that the Northern Ireland Housing Executive (NIHE) be given the strategic role and responsibility for the provision of accommodation for Travellers. This included the transfer of all existing district council owned sites to the Northern Ireland Housing Executive (NIHE).

The Housing (Northern Ireland) Order 2003 provided the legislative framework to allow for the transfer from district councils to the NIHE of all sites/land in receipt of funding in the form of a government grant either for the acquisition or the development of land for Traveller accommodation. On 1st December 2003 a number of sites/lands were transferred to NIHE under the Order from the following former District Councils: Strabane, Belfast, Derry, Omagh and Dungannon.

¹ The position of the Irish Traveller Community as a group protected against racial discrimination was established by the Race Relations (Northern Ireland) Order 1997.

Travellers' Accommodation Strategy

As the Regional Housing Authority for Northern Ireland, NIHE has strategic responsibility for providing Travellers' Accommodation. In delivering the Traveller Accommodation Programme, the NIHE has worked to improve the range of accommodation options available and continues to work with partner agencies, regionally and locally to reduce the inequalities experienced by Travellers.

Travellers require decent, culturally sensitive accommodation which provides meaningful choice for households regarding their way of life.² In order to support this aim the NIHE completes a comprehensive housing needs assessment every five years. This informs an Irish Travellers' Accommodation Strategy and a five year programme of activities. More information on this can be obtained at <https://www.nihe.gov.uk/About-Us/Corporate-Strategies/Irish-Traveller-Strategy>

PLANNING POLICY CONTEXT:

The Northern Ireland Planning System

In April 2015, the Northern Ireland planning system was reformed and restructured from a unitary system where all planning powers rested with the then Department of the Environment (DOE), to a new two-tier model of delivery whereby the eleven local

councils have primary responsibility for the implementation of the following key planning functions:

- local plan-making;
- development management (excluding regionally significant applications); and
- planning enforcement.

The DOE retained responsibility for regional planning policy, the determination of regionally significant and called-in applications and planning legislation. It also provided oversight, guidance for councils, governance and performance management functions. These DOE responsibilities were transferred to the new Department for Infrastructure (DfI) in May 2016 and are aligned with the former Department for Regional Development's existing regional planning responsibilities as set out in the [Regional Development Strategy 2035](#).

[DfI's Regional Development Strategy 2035 \(RDS\)](#), published in 2012, guides the future development of Northern Ireland to 2035 and is the spatial strategy of the Executive.³ It provides an overarching strategic planning framework to facilitate and guide the public and private sectors. The RDS addresses economic, social and environmental issues aimed at achieving sustainable development and social cohesion. It has a statutory

² Outlining Minimum Standards for Traveller Accommodation, Equality Commission for N.I., (ECNI) (2009), page 9.

³ <https://www.infrastructure-ni.gov.uk/publications/regional-development-strategy-2035>

basis and all planning policy and guidance prepared by central government must be in general conformity with the RDS.

Local Development Plans currently being prepared by councils must also take account of the RDS. Its vision is for “An outward-looking, dynamic and liveable Region with a strong sense of its place in the wider world; a Region of opportunity where people enjoy living and working in a healthy environment which enhances the quality of their lives and where diversity is a source of strength rather than division.”

In September 2015, DfI's [Strategic Planning Policy Statement \(SPPS\)](#) was published in final form. This sets out the Department's regional planning policies for securing the orderly and consistent development of land in Northern Ireland under the reformed two-tier planning system. The provisions of the SPPS must be taken into account in the preparation of Local Development Plans, and are also material to all decisions on individual planning applications and appeals.

The SPPS does not seek to restate policy or guidance that is expressed elsewhere within other relevant government strategies or policies.

The relevant Strategic Planning Policy for Travellers' Accommodation as set out in the SPPS is reproduced beside;

Traveller Accommodation

6.144 Travellers have distinctive needs which will be assessed as part of the local HNA/HMA. Where the HNA/HMA identifies a demonstrable need for Travellers specific accommodation, planning permission will be granted for a suitable facility to meet this need. This may be provided through a grouped housing scheme, a serviced site or a transit site, subject to meeting the following criteria:

- adequate landscaping being provided;
- the development being compatible with existing and proposed buildings and structures in the area paying particular regard to environmental amenity; and
- Where appropriate, the provision of workspace, play space and visitor parking being provided.

6.145 Where a need is identified and a development plan is under preparation, this should identify a suitable site(s).

6.146 Where a need is identified for a transit site or a serviced site, which cannot readily be met within an existing settlement in the locality, proposals will be required to meet the policy requirements in respect of rural planning policy for social and affordable housing.

In addition it is important to note that PPS12: (Housing in Settlements) – Policy HS 3 (Amended) 'Travellers' Accommodation 2013' will also apply during a transitional period whilst a council brings forward a Plan Strategy for their area (See Paragraphs 1.10-1.12 of the SPPS).

With the introduction of the new two-tier planning system on 1 April 2015, councils now have the power to allocate housing land to facilitate the 'right' mix of housing tenures for their own plan area including open market and special housing needs such as Travellers' accommodation. Councils will bring forward detailed operational planning policies for inclusion within their Local Development Plans, tailored to local circumstances. In doing so, councils must take account of the provisions of the SPPS.

It is ultimately a matter for a Council as the planning authority to determine individual planning applications for 'Travellers' Accommodation' on a case by case basis, taking into account all relevant material planning considerations, including the provisions of the local development plan, regional planning policy, the characteristics of the site and the Design Guide for Travellers' Sites NI. The relevance and weight given to material considerations is a matter of planning judgement for the planning authority.

Site Licences for Travellers' Sites

In the main, Traveller sites will require a site licence as they are providing space for a caravan which Travellers consider to be their permanent residence. The length of stay on a particular site is irrelevant. The only exception to this is where a temporary site is provided as an emergency halting stop for 1 or 2 nights. Planning permission must be obtained for a caravan site before a licence can be applied for with the Local Council. Under the Caravans Act (NI) 1963 as amended by the Caravans Act (NI) 2011, the Local Council may apply conditions on the licence. Failure to hold a Site Licence or breaking any licence conditions is an offence which can incur a fine.

Scope of the Guide

This guidance is primarily intended to apply to caravan sites for Travellers (as defined under the Caravans Act (NI) 1963) and addresses the three site categories⁴ listed below:

- Serviced Site
- Transit Site
- Emergency Halting Site

A Serviced Site is a range of managed accommodation where Traveller families have a permanent base to park their caravan or erect a structure as defined within the Caravans Act (NI) 1963 as amended by the Caravans Act (NI) 2011; where electricity, water and sewerage are provided and where other facilities such as communal or individual amenity buildings must be provided.⁵

A Transit Site is a permanently operational facility with similar facilities to serviced sites where Travellers may park their caravans on a temporary basis and where electricity, water and sewerage services are provided. They are not intended for use as a permanent lease for an individual household.

An Emergency Halting Site is a temporary (less than 28 days) place to park with appropriate facilities managed under Co-operation Policy principles.⁶ They may not require planning permission if they are in use for fewer than 28 days.

A fourth type of accommodation for Travellers is Group Housing Schemes. Group Housing is developed through the Social Housing Development Programme (SHDP). The specifications for these developments are comparable to that provided for the settled community and covered under guidance provided by the Department for Communities (DfC) Housing Association Guide⁷ and the relevant Planning and Building Control regulations. Specific requirements such as layout or caravan parking for group housing are outside the scope of this guide but should be determined by consultation throughout the design process with prospective residents and their families in line with the guidance in this document.

The Design Guide will apply to all new Traveller sites or to existing Traveller sites that are capable of being brought up to Design

⁴ These are the categories as used by NIHE and Planning Authorities. Elsewhere a 'Serviced' Site is sometimes referred to as a 'Permanent' site and the 'Emergency Halting Site' is sometimes referred to as a 'Temporary Stopping Place'.

⁵ Definition - The definition of caravan can include mobile homes, park homes and timber framed sectional buildings if they fall within the description given under Part 4, section 15 of The Act.

⁶ In Northern Ireland, the Co-operation Policy, managed by the NIHE, allows camping on a temporary basis. It is a way of dealing with a humane requirement rather than an alternative to the permanent sites or transit sites. Once the co-operation policy is in place for a given site, Travellers are allowed to remain, subject to a number of conditions. Details can be found on the NIHE website <https://www.nihe.gov.uk/Housing-Help/Advice-for-Travellers/Our-co-operation-policy-for-Travellers>.

⁷ <https://www.communities-ni.gov.uk/articles/housing-association-guide>

Guide standard through redevelopment. NIHE has responsibility for determining which sites are capable of such redevelopment.

FIRE SAFETY, RISK ASSESSMENT AND ACCESSIBILITY

Fire Safety

The Northern Ireland Fire and Rescue Service (NIFRS) website: www.nifrs.org contains a range of helpful information on fire safety and the requirements of The Fire and Rescue Services (Northern Ireland) Order 2006. This includes links to fire safety guides including a specific guide relating to fire safety for caravan site operators.⁸

Consideration should be given to the recommendations made in Section 6 of the NIFRS guidance. For example at Traveller or Roma sites, NIFRS recommends that during meetings and site visits it should be emphasised that in the event of a fire the occupier should 'Get Out, Get the Fire and Rescue Service Out, and Stay Out', and therefore the provision of fire points, firefighting equipment or a fire warning is not recommended.

Designers should also follow The DfI Model Licence conditions 2019 fire safety measures.

As reflected in the Model Licence conditions an emergency telephone for calling the emergency services is only required if mobile phone reception is poor.

Risk Assessment

It is essential that site owners undertake a general Health and Safety risk assessment of the site during the initial stage.

Accessibility

All new private or communal buildings on a site are statutorily required to achieve the mobility standards as specified within the current NI Building Regulations. However to allow for future adaptability of the pitches, the designs should comply with the relevant requirements of both the Lifetime Homes (LTHs) standard and the additional LTHs requirements in the Housing Association Guide⁹ as a minimum, but with provision for full wheelchair usability to be considered in accordance with identified need. Developers must also have regard to the Disability Discrimination Act 1995, as amended by the Disability Discrimination (NI) Order 2006, both when designing the site and during refurbishment planning.

When considering the extent to which pitches, parking spaces and amenity buildings should be designed from the outset for

⁸ <https://www.nifrs.org/wp-content/uploads/2018/11/Caravan-Site-Operators-Guide-V1.pdf>

⁹ <https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/hagds-tb3-lth-additional-departmental-requirements.pdf>

disabled persons, including wheelchair users, reference should be made to local Traveller Accommodation Needs Assessments which will provide information on households with a person with a disability or long term illness which limited their day-to-day activities.

Where a need has been identified on a new site for a specific tenant who is a wheelchair user, a pitch should be selected and designed for full wheelchair usability. Additionally, where a general assessment indicates high levels of disability, constructing all pitches on a site to meet the requirements of a wheelchair user as a contingency for future demand can be considered. Where provided, these should be consistent with the standards for housing for wheelchair users as set out in the DfC Housing Association Guide.¹⁰

Consultation

Effective and meaningful engagement with Travellers, their support groups, and liaison with the local community from the initiation of a proposal through to completion, is essential for a successful, integrated and sustainable development. Issues requiring discussion include: site selection, design features, facilities and services, management and maintenance of sites and provision of accommodation other than through serviced or transit sites.

This guidance is not intended to replace local consultation with Travellers and other key agencies. Local consultation should include:

Travellers from the communities whose needs will be met on the site, including if possible, the families who will move onto the site at first let;

- Northern Ireland Fire & Rescue Service;
- The Police, for advice on site security;
- Northern Ireland Water;
- DfI Roads Division;
- The local council, including the planning department and building control from the very first stages of site identification;
- Local residents & businesses;
- Local Education, Local Health and Social Care Officers; and
- Designated officers & maintenance Officers.

The same principles apply to consultation on Traveller sites as with other refurbishment projects and new developments. Very few architects and developers will have first-hand experience of living on a site as part of Traveller communities, and consultation with Travellers will be crucial to ensuring the site works successfully.

¹⁰ <https://www.communities-ni.gov.uk/wheelchair-housing>

The needs and preferences of those who will live on the site should be given full consideration and should be met as far as is possible within available resources. People who have lived on sites for most or all of their lives are in the best position to advise on what works well and what doesn't for a particular community. However, the needs of those people who will move onto the site at first let will need to be balanced with the needs of those who may live on the site at a later date.

When to consult?

Travellers and/or their relevant representative bodies should be consulted from the outset their involvement will ensure the entire process is effective and culturally appropriate. Local communities can be aware of factors which, despite site shortages, could prevent take up of site places in particular areas.

Methods of consultation

The NIHE has an established record of joint working with the Traveller communities through the development and publication of the Travellers' Accommodation Needs Assessments in Northern Ireland. It is recommended that Housing Associations wishing to work with Travellers for the first time, consult with the NIHE and the Traveller support groups at the outset to secure its own introductions.

Where difficulties remain, introductions can usually be secured through other organisations which already have a good working relationship with members of the Travellers community and their representative organisations.

Participation will be greatly improved by holding the consultation in culturally appropriate venues and locations.

A decision on the best approach to consultation should be made in discussion with the Travellers and their representative organisations. Different approaches may be required for different Travellers with engagement required to determine the most appropriate approach to consult effectively. Different methods of communication may include written, verbal and focus groups.

It would be beneficial to ensure as far as possible that sympathetic and knowledgeable architects and contractors are employed in the site design process. At an early stage the NIHE should provide an 'awareness raising' session on Traveller culture involving representatives of the local Traveller communities. This would be a means of opening dialogue and facilitating ongoing consultation with prospective residents, which is necessary to ensure the successful design and construction of the site and achieve best value for the money.

An Assessment of Travellers' Accommodation Needs in Northern Ireland, which is published periodically by the NIHE, gathers views on site design and satisfaction with existing sites. The information contained within this report should be drawn upon and added to the knowledge base.

Feeding back on the results of consultation

The results of any consultation should always be fed back to the individuals and/or communities concerned. Where it has not been possible to meet the expressed preferences of the community the reasons for this should be clearly explained.

Once the site has been developed, this consultation process offers the basis of a permanent residents' forum, which can help sustain a good co-operative spirit of consultation between the NIHE and residents which is a key element in managing a site successfully.

Consulting with the settled community

As for other kinds of development, it is important that members of the local

community, whether Travellers or settled residents, are able to provide views on plans for new sites.

Misinformation and limited contact between Travellers and the settled community can feed distrust and misconceptions, and these must be challenged and addressed proactively. Opposition from the settled community can delay, and in some cases prevent, the issue of planning permission for new sites. The right of any individual to comment on any development proposal is central to the functioning of a fair and open planning system and should be protected and facilitated at all costs.

It will be important to demonstrate the need for new site provision in any consultation with the settled community, and the steps that the NIHE will take to address concerns and deal with problems should they arise.

Review of this Design Guide

This Guide will be reviewed every five years from the date of publication.

Serviced Sites

The Site

Site Location / Selection

1. Selecting the right location for a site is a key element in supporting good community relations and maximising its success. As with any other form of housing, poorly located sites will have a detrimental effect on the ability of residents to:

Seek or retain employment;

Attend school, further education or training; and

Obtain access to health services and shopping facilities.

Principles

2. Sites should have safe and direct access onto a public road with reasonable proximity to major roads and public transport services.
3. Sites should be located within a reasonable distance to local schools, shops, medical services, parks, places of worship and community facilities. Sites should be located where services (e.g. drainage, water supply, electricity, telephone, etc.) are available or can be provided for reasonable cost.

4. Easy access to essential services and facilities promote social contact with other residents in the settled community therefore encouraging a greater sense of community with shared interests.
5. It is essential to ensure that the location of a site will provide a safe environment for the residents. Sites should not be situated near refuse sites, industrial processes or other hazardous places as this could have a negative impact on the general health and well-being of residents and pose safety risks particularly for young children. All prospective site locations should be considered carefully before any decision is taken to proceed to ensure that the health and safety of future residents is not at risk. It should also provide privacy and have characteristics which are sympathetic to the local environment. When selecting locations for permanent sites consideration needs to be given to the fact that children will be on the site.
6. Sites should not normally be identified for Traveller use in locations that are inappropriate for ordinary residential dwellings. Exceptions can be considered if for example the location is unsuitable for housing for practical or technical reasons, and the health and safety of

the Traveller is not compromised. If the site is sustainable and is supported by the Travellers and the wider community exceptions may apply in the following circumstances:

- Prospective residents are happy to live in the location;
- Existing land is available to meet immediate need on a short term interim basis pending a longer term solution; and
- Land is suitable for low level single storey development but not for multi storey construction requiring deeper foundations.

7. In such cases prospective residents should be made aware of these exceptional circumstances at the outset.

Relationship to Surrounding Land Use

8. Consideration must be given to the relationship of sites with the surrounding settled community. For this purpose it is important to ensure that proposals to develop a site are compatible with broader strategies in place for improving community cohesion. The site must be sustainable, offering scope to manage an integrated coexistence with the local community. This will include consideration of noise and possible disturbance to Travellers living on the

site and possible noise and disturbance to the wider community, in particular from movement of vehicles.

9. Many Travellers express a preference to live in a rural location on the edge of, or closely located to, a large town or city consistent with their traditional lifestyles and means of employment. Sites adjacent to light industrial areas therefore tend not to be popular because of their isolation, distance from local facilities and safety risks due to poor lighting.

Health and Safety Considerations

10. A site survey and investigation should be undertaken in all cases to identify possible problems, e.g. waterlogging, flooding, landfill, contamination, etc.
11. Sites must be located on land that has been properly decontaminated. If contamination is present remedial work should only be undertaken by approved contractors in accordance with relevant standards to ensure the contamination has been remedied to the standard on which housing development would take place. These processes can be prohibitively expensive and should be considered only where the development is financially viable.

12. Previously used sites may be suitable; however the standard of appraisal should reflect the standards for conventional residential housing. For example, sites adjacent to a rubbish tip, on landfill sites, close to electricity pylons or any heavy industry are unlikely to be suitable.
13. When considering sites adjacent to main roads, flyovers and railway lines, careful regard must be given to:
 - The health and safety of children and others who will live on the site; and
 - The greater noise transference through the walls of caravans than through the walls of conventional housing and the need for design measures (for instance noise barriers) to abate the impact on quality of life.
14. The proposed site must be relatively flat and suitable for purpose. Sites should not be developed on exposed sloping sites where there is risk of caravans being overturned.

Good Relations

15. Sites should support harmonious relations, both within the Traveller communities and between Travellers and the settled community. Research

by Equality Commission for Northern Ireland (ECNI) ([Outlining Minimum Standards for Traveller Accommodation](#)) has highlighted the issue of compatibility as a key success factor in developing sites.¹¹

Scheme Design

16. Following site identification and investigation there are a number of factors that will need to be taken into account when creating a design brief for the site. The physical layout of the site should take into consideration the specific preferences of site residents. These factors include:
 - Consultation with and between the Traveller and settled communities;
 - Number of family groups to be accommodated;
 - Average family size and range of family sizes;
 - Relations between family groups;
 - Desire of Travellers to settle;
 - Desire of Travellers to have community facilities provided;
 - Attitude towards integration with the settled community;
 - Planning considerations and the design approach including any special

¹¹ NIHRC have highlighted some examples of incompatibility in the investigation report. <http://www.nihrc.org/publication/detail/out-of-sight-out-of-mind-Travellers-accommodation-in-ni-executive-summary>

requirements of the relevant planning authority affecting layout and development;

Appropriate architectural treatment, which should seek to produce a design of character;

The number of pitches and the size of the site;

Provision for open space, play areas, work areas, community facilities, landscaping and grazing;

Any special considerations regarding accessibility in the design of buildings and facilities;

Provision for management of the site;

Obtaining scheme approval and planning permission from the relevant council/ planning authority;

Adherence to Northern Ireland Building Regulations;

All appropriate statutory obligations;

Access issues;

Cost parameters; and

Environment and aesthetics of the land to be developed.

17. The preferred design option must be derived from a robust needs assessment and an economic appraisal of the range of possible options for a particular site

and group of Travellers, taking into account feasibility and value for money.

18. With regards design standards it is also recommended that peer groups are created with existing site occupants, for the purposes of providing design reviews at an early stage when provision is being considered and also prior to a planning applications being submitted.

Sustainability

19. Sites should be developed so that they:

promote peaceful and integrated co-existence between the site and the local community;

promote, in collaboration with commissioners of health services, access to appropriate health services;

ensure that children can attend school on a regular basis;

provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;

provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development;

avoid placing undue pressure on local infrastructure and services; and do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.¹²

SITE DESIGN

Size and layout of the Site

20. Ultimately it is a matter for the local council as the planning authority to determine the appropriateness of the 'Site Design' taking into account the relevant local development plan, planning policy, local circumstances and all other material planning considerations.
21. When designing the layout of a site careful consideration must be given to the health and safety of residents and in particular children. The need for separate vehicular/pedestrian access should also be considered.
22. It is important to ensure that traffic calming measures are considered for all sites. Care should be taken when introducing speed humps and other measures to ensure that appropriate drainage is accommodated within the scheme to allow for the effective passage of surplus water.
23. Clear and effective signage should be introduced where a speed restriction or other traffic calming measure is to apply. Similarly, clear directions should be in place to indicate the location of hydrants and other access points for the fire service when attending an emergency on site. Signage should be in graphical form in addition to the written word.
24. For practical reasons, caravan sites require a greater degree of land usage per household than for a house with the same footprint. Traveller sites are designed to provide land per household which is suitable for a caravan as defined within the Caravans Act (NI) 1963 (as amended) and an amenity building together with space for parking. Sites of various sizes, layouts and pitch numbers operate successfully and work best when they take account of the size of the site and the needs and demographics of the families that reside on them. Sites where pitches are in a linear form or in "tree branch" form may be a preference for some families, while others may prefer a circular or horseshoe design as these provide a better sense of community.

¹² Advice on flood risk and Flood Maps NI is available from the Department for Infrastructure website: <https://www.infrastructure-ni.gov.uk>

25. All areas of the site should generally be allocated for a specific use, such as pitches, and roads, as open space that has no obvious purpose is undesirable.
26. Consultation with the Traveller communities is crucial in deciding how best to proceed with the overall layout of the site. It is a key element in obtaining the trust and full support of the prospective residents at the earliest stage of the project and can help identify potential barriers and deal swiftly with subsequent consultation on individual aspects of the design as they arise.
27. There is no optimum size of site or number of pitches¹³ Generally the size of site will depend on the individual scheme and take into account a number of factors such as need, compatibility between distinct families and health and safety issues. NIHE experience would suggest smaller sites are easier to manage and more likely to attract Travellers in compatible family units. Larger sites, on the other hand, are more economical to develop but more likely to have management difficulties and compatibility problems. However for the purposes of this Guide, no more than 6-8 pitches is the recommended number of pitches given the advantages outlined above.
28. Where a larger site is unavoidable due to clear evidence of need, local Traveller communities preference and value for money, then up to 15-20 pitches can be considered. Extensions to existing residential sites may lead to authorities exceeding 20 pitches on a particular site. This may be appropriate when authorities seeks to keep families together and has had regard to the views of existing residents and the surrounding community.
29. The creation of smaller 'closes' within a larger site for distinct, extended families should be considered to help create a sense of community and create definable space. This arrangement could also open up possibilities for facilitating inter site transfers where, for example, families may be offered the opportunity to move closer to other family members or elderly and dependant relatives where a pitch in a certain close may become available.

¹³ ECNI's 'Outlining Minimum Standards for Traveller Accommodation' (2009) document recommends a maximum of 20 pitches on a permanent serviced site, whereas in England, DCLG's Good Practice Guide (2008) suggests a maximum of 15 pitches. Previous guidance for Northern Ireland as issued by DOE (1997) stated that sites should not be less than 6 or more than 20 pitches. The Welsh guide states generally no more than 12, but flexibility for a maximum of 15-20 or more if necessary.

SITE BOUNDARIES

30. The site boundary must provide clear demarcation of the perimeter of the site so as to prevent nuisance for existing residents. The site should be contained on all sides and boundaries should take into account adjoining land uses and be designed for the safety and protection of children. This subject merits specific attention in consultation with the local Traveller communities at an early stage in the design process.
31. Generally, suitable fencing of at least 1.8m high with planting should be provided. The views of Travellers and local residents living in close proximity are important in agreeing the height of boundaries. However, a range of other boundaries may be used including low walls, hedges, earth banks and natural features. Existing walls and fences may be used if they are sound and of sufficient height. The aim should be to achieve a boundary that is sympathetic to, and in keeping with, the surrounding area. Boundaries can also be used to provide shelter for more exposed sites.
32. Where a site is to be located near an industrial area or a main road, fencing and planting may be used for screening purposes. Conversely more open boundaries may be used in residential areas so as to promote integration

and inclusion with the surrounding community although the degree of integration which can be achieved will be in part governed by the degree of community cohesion already experienced in that location. A balance needs to be struck between providing privacy and security for the site residents and avoiding a sense of enclosure through, for example, the use of high railings.

33. Measures to protect the safety of site residents from fire are of paramount importance and it is essential that a clear gap of 3 metres is provided within the inside of all site perimeter boundaries as a fire prevention measure.

Size of Pitch

34. There is no one-size-fits-all measurement of a pitch as, in the case of the settled community, this depends on the size of individual families and their particular needs. In designing a site, account should be taken of the likely characteristics of families on the waiting list as identified by a [Travellers Accommodation Needs Assessment in Northern Ireland](#).
35. ECNI's research noted that most Travellers expressed a preference for a design that would give maximum space per pitch and space for children to

play.¹⁴ Some Travellers can have large families, for instance where members of an extended family live together. There may also be families with older children who may want one or two additional small touring caravans on the pitch as separate sleeping accommodation for older children.

36. For this reason there is likely to be much greater demand amongst these communities for large family units, and small pitches may become quickly overcrowded. Larger family sizes alongside the need for vehicles for towing caravans and for employment also create particular requirements for parking.
37. Some families may also be in possession of larger mobile homes and, pitches should be large enough to cater for this possibility. Conversely, potential residents may be single or elderly members of the community who would not need a pitch of the same size.
38. Innovative site design that facilitates growth in number of pitches on an established site should be considered where possible. For example, a horse-shoe shaped design could be amended to a circular shape to

increase the number of pitches on the site. Future changes to the site should not undermine health and safety considerations, standards of proximity between pitches, emergency access routes etc.

39. Previous guidance proposed a minimum pitch size of 225m² (e.g. 12.5m wide by 18m deep)¹⁵, but rather than be prescriptive, it is simply recommended that a pitch is designed to accommodate the following range of amenities:
 - An amenity building;
 - a caravan as defined within the Caravans Act (NI) 1963 (as amended);
 - drying space for clothes;
 - a lockable shed (for bicycles, wheelchair storage etc.); and
 - parking space for two vehicles and a small garden area.¹⁶
40. Smaller pitches, as a minimum must be able to accommodate an amenity building, a caravan as defined within the Caravans Act (NI) 1963 (as amended), drying space for clothes and parking for at least one vehicle.

¹⁵ Design Guide for Travellers' Sites in Northern Ireland, DOE, (1997), section 4.1 at page 15.

¹⁶ Outlining Minimum Standards for Traveller Accommodation, ECNI, March 2009, section 6 at page 58.

41. Individual parking spaces should be a minimum of 2.4 × 4.8 metres.
42. The inclusion of a play space or grassed area on each pitch is not usually feasible and therefore space for play as part of a central and communal focal point for all site occupants is normally preferred.
43. The requirements for drainage falls are contained within Part N of the current Building Regulations (Northern Ireland).¹⁷

Layout of Pitches

44. The layout of pitches will depend on the layout of the overall site. There will be different views about whether to have grassed areas and amenities at the front, back or side of the pitch. Discussion with the Traveller communities will be useful, however developers also need to consider prospective residents' needs.
45. Each pitch should be clearly demarcated to make it clear what each individual household may occupy in return for the fee paid and their responsibilities for the pitch they occupy. Adequate space separation should be maintained between caravans in accordance with

DfI and Northern Ireland Fire and Rescue guidance.¹⁸

46. The boundaries between pitches also act as a fire break so grass embankments, raised plant beds or low walls, rather than wooden fences, should be considered. The aim should be to achieve a boundary that is clear, sympathetic to and in keeping with surrounding areas.
47. Pitch boundaries should provide a balance between good neighbourliness and privacy. Guidance on boundary fences and hedges between caravans, in line with the NIFRS guide, should be no higher than 1m or 1.8m if made from a non-combustible material.
48. Residents should be consulted on what they prefer in terms of pitch security. Each pitch may have a secure lockable gate. This will enable pitch residents to secure their own pitches. Any gates should be of a robust and pleasant design and not so imposing they act as a barrier screening off pitches completely or restrict access or egress of the emergency services. Gates should be at least 3.1 metres wide.

¹⁷ <http://www.buildingcontrol-ni.com/assets/pdf/building-regulations-ni-2012.pdf>

¹⁸ DfI, Model Licence Conditions 2019, Caravans Act (Northern Ireland) 1963, Section 5 available at <https://www.infrastructure-ni.gov.uk>; NIFRS, A Fire Safety Guide for Caravan Site Operators is available at <https://www.nifrs.org>

Orientation of Pitches

49. As with the settled community, site layout and design should ensure a degree of privacy for each household without inhibiting the sense of community.
50. Due regard should be given to privacy and security.
51. 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. Account needs to be taken of a tendency for some Travellers to use a mobile home in place of the traditional caravan.
52. Some mobile homes can be up to around 20 metres in length¹⁹. In order to accommodate this, the site design should strike a balance between enabling a variety of accommodation to be catered for and making best use of available space. Access roads and the site design should provide sufficient space for the manoeuvrability of average size caravans of up to 15 metres in length with capacity for larger mobile homes on a limited number of pitches where accessibility can

be properly addressed in the light of the land available.

53. In addition to the movement of families on and off the site, site residents will sometimes wish to change the caravan accommodation they own and this movement can sometimes cause problems when boundary fences or gates do not allow for this. This could be overcome by the use of movable fencing and gates adjacent to the roadside which are capable of short term removal.

Site Access and Roadways

54. Access to the site should have good sightlines. Good sightlines are essential, as caravans on tow will be entering and leaving the site at various times. DfI Roads Division will be consulted on applications by the relevant council as the planning authority to ensure that all accesses to and from public roads comply with the relevant standards
55. The width of the internal access roadway should normally be adequate for 2-way traffic and be not less than 3.7 metres wide. The design must allow caravans on tow to be positioned on pitches

¹⁹ The dimensions of a caravan (or mobile home/park home/timber sectional building) must not exceed 20m length, 6.8m width and 3.05m internal height if it is to fall within the definition of a caravan under the Caravans Act (NI) 1963 (as amended).

and adequate turning space must be provided in cul-de-sac layouts. However where the area of a site is restricted, consideration may be given to other design approaches, e.g. one way loops and 'pull-in areas' for internal roads. In any event, sufficient space must be allowed for manoeuvring caravans into and out of pitches and for access and egress of the emergency services.

56. A stretch of internal access roadway immediately adjacent to the site entrance should be of adequate width to allow, for example, 2 lorries to pass each other safely, and of adequate length to cater for caravans on tow entering or leaving.
57. A ramp or similar device will be required near the entrance to the public road in order to ensure a reduction in speed of vehicular traffic. Consideration must also be given to the use of such ramps at other locations within the site.
58. Good quality roads which are capable of withstanding heavy vehicles should be constructed. Although roads on sites do not require adoption, all roads should be constructed to adoptable standards to avoid future maintenance costs from increased wear and tear due to frequent

movement of heavy vehicle. Normally concrete or tar macadam on a suitable sub-base appropriate to soil conditions is preferable. Guidance and assistance can be found on the DfI website: <https://www.infrastructure-ni.gov.uk>

Access for Emergency Vehicles

59. It is essential that sites are designed so that appropriate turning and reversing requirements of emergency vehicles are incorporated. Access requirements for emergency vehicles are covered under the current Northern Ireland Building Regulations and detailed within Section 6 of Technical Booklet E. This may impact on the number of pitches permitted. Good practice from recognised sources is outlined in the paragraphs below which can be used as a starting point prior to discussions with local emergency services.
60. In designing a site, all routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning. Emergency vehicles should have access to within 45 meters²⁰ (hose route) of any building or a caravan/trailer, where the 45 meters distance should be to a door giving access to the interior. Cable overhangs must meet the current statutory requirements but should

²⁰ NI Building Regulations: Technical Booklet E (Fire Safety) 2012, 6.19 (b) (i).

generally not be less than 5.8 metres for lines not exceeding 33KV.²¹ Vehicular access and gateways must be at least 3.1 metres wide and have a minimum clearance of 3.7 metres.²²

61. Roads must not be less than 3.7 metres wide or if they form part of a one way traffic system, 3 metres wide. One way systems should be clearly sign posted. To increase potential access points for emergency vehicles more than one access route into the site is recommended.

Children's Play Area

62. A safe communal recreation / play area for children of all ages is recommended on site where suitable provision is not available within reasonable walking distance from the site on a safe route or using easily accessible public transport. For larger sites, specially designated play areas with play equipment should be considered in close liaison with the local council. Ideally, these should be designed in consultation with children and parents, to ensure equipment is provided that will be well used.

63. Where recreation areas are provided it is important to ensure they are designed and located with the safety of children in mind (taking into account the proximity of busy roads) and allowing for supervision. Warning signs should be placed at the entrance to the site and throughout warning drivers of the presence of children.
64. Any designated play area should be flexible, adaptable, varied and interesting. Providing features such as shrubs or sand will promote good quality play. Any equipment should meet normal local Council standards. Play areas should be well lit and designated as dog free areas.
65. Locating play areas in secluded areas of the site and near boundary perimeters is not favoured as children could be subject to outside harassment and the play area and equipment open to vandalism. Perimeter fencing should be included to ensure children are safe from site traffic and to prevent dumping or use for scrap storage.

²¹ Electricity Safety Quality and Continuity Regulations (Northern Ireland) 2012 SR 2012/381 (ESQCR)

²² Designing Gypsy and Traveller Sites- A Good Practice Guide, DCLG, (2008).

Car parking

66. A key element for the site is the provision of adequate parking space for residents' use. Car parking spaces must be a minimum of 2.4 x 4.8 metres each. Cars may be parked between adjoining caravans provided that they do not obstruct entrances to caravans or access around them and they are a minimum of 3 metres from an adjacent caravan. A site should also contain additional parking facilities for visitors as parking on the roadside could otherwise impede access of fire and other emergency services. Separate parking areas may present security considerations for residents and should therefore be situated in sight of residents generally.

Site Security

67. Site design should aim to show due regard to security and privacy. Site layout should maximise natural surveillance enabling residents to easily oversee all areas of the site. Scheme specific advice on security provision for the site should be obtained from the PSNI Crime Prevention Design Advisor (CPDA) for the area and reference should be made to 'Secured by Design' standards to inform detailed planning of the site.

68. Site layout can play an important role in avoiding a sense of enclosure and isolation amongst Travellers. The aim

should be to 'design out' crime and social exclusion and 'design in' community safety and social inclusion through openness of design, allowing ease in passing through, whether walking or driving. Care also needs to be taken to ensure the safety of residents and children where car traffic passes through.

69. Before pursuing this approach however, prospective residents should be consulted at the outset to ascertain the level of community cohesion already prevalent in the area and to establish the degree to which those who are to live on the site are comfortable with this approach and if it meets the degree of privacy and security that is acceptable.

70. It is important to provide clear delineation of public communal areas such as play areas and private space with boundaries that indicate clearly where individual pitches begin and end. It is recommended that communal areas without a clear usage are avoided in the design as they may attract vandalism, fly tipping or unauthorised caravans.

71. It is recommended that local needs and preferences are taken into account as well as the requirements of DfI Roads and fire and rescue services when designing the entrance to the site. Many Travellers are in favour of controlled

access to sites, for example using a lockable gate. Such controls can prevent unauthorised parking and caravans on site. Access should be maintained for emergency vehicles and services.

Landscaping

72. Site landscaping that provides a mix of durable, hard landscaping (paved or concrete areas) with some good quality, soft landscaping (grassed areas, shrubs and trees) should ideally be provided. The landscaping should be designed throughout for low maintenance, and thought should also be given to preventing it from being used for unauthorised parking or unauthorised pitching of caravans. Consultation with Travellers on the provision of soft landscaping is essential as a preference for hard surfacing has been expressed by some Travellers.

73. Landscaping opportunities within and on the edge of the site should be used to create an attractive environment that can enhance resident satisfaction and pride with the site, encouraging participation with management to maintain their surroundings.

74. Planting should prove more successful if provided within a few large areas instead

of in scattered patches throughout the site, although soft landscaping can be used to ensure spatial separation which prevents the movement of caravans to positions which would breach fire safety distances from the adjoining pitch.

75. Including artistic features on site could be an ideal opportunity for existing residents or potential residents to celebrate Traveller culture and identity. If this is to be considered, consultation with existing or potential residents should take place at an early stage. It is important any feature is agreed in partnership with residents. This would be a good opportunity to get Traveller children involved in the design and development of artistic features on site, particularly if there is a children's play area.

Hard Standing

76. Each pitch must include a hard standing area constructed of concrete or a similar suitable hard wearing material which extends over the whole area to be occupied by a touring caravan or other vehicle. The use of stoning should be avoided. These standings must be constructed in accordance with the industry code of practice and project a sufficient distance outwards to enable occupants to enter and leave safely. The base must be sufficient to bear the load

placed on it by the home or vehicle and its contents, and the anticipated level of vehicle movement.

77. Ideally hard-standing should be part of the landscape design and the pitch width need not be entirely paved. Where agreed, pitches could be designed to break monotonous design with soft landscape and where this is adopted in the design, consideration should be given to the inclusion of a storage facility on each pitch for residents to keep equipment to maintain it.

SITE FACILITIES

Private amenities

78. The provision of private amenities on each pitch including a toilet, wash hand basin and shower with hot and cold water supply is essential.

Amenity Building

79. It is essential for an amenity building to be provided on each service site pitch. This should have a floor area of at least 25 meters² and can be a detached or semi-detached design if across two pitches. The amenity building should normally be a traditionally constructed permanent building,²³ however the use of

modern methods of construction (MMC), such as prefabricated pods, should be considered where there are clear benefits in terms of cost, maintenance, security, etc.

80. The amenity building must include as a minimum hot and cold water supply, electricity supply, a separate toilet and hand wash basin, a bath/shower room, a kitchen with sink drainer and worktop, and a dining area. The access to the toilet should be through a lobbied area or by separate access direct from the pitch. The amenity building must also include secure storage space for harmful substances/medicines, enclosed storage for food, brooms, washing and cleaning items and space with wiring/plumbing/drainage for connection of a cooker, fridge/freezer, washing machine and drying space for clothes.
81. The inclusion of a day/living room in the amenity building for family meals, and for children and young people to play and study is recommended. The day/living room could be combined with the kitchen area to provide a kitchen/dining/lounge area. It is desirable that the day/living room should not be part of essential circulation space, nor contain essential storage.

²³ In this context the term 'traditionally constructed' refers to masonry cavity wall construction.

82. The design and construction of amenity buildings must meet the requirements of the current Building Regulations, the Institution of Electrical Engineers (IEE) regulations, the NI Water and DfC Design Standards. Materials used must comply with the relevant British Standards and Codes of Practice and provide for durable and low maintenance buildings. Its design should be sympathetic to local architecture, be attractive and of a domestic nature taking account of the relevant planning considerations and the local climate.
83. Wall and floor finishes should have a high standard of durability. Particular attention should be paid to matters such as ease of maintenance and cost over its lifespan. Plumbing should be concealed as far as possible.
84. It is recommended that amenity buildings incorporate cost effective energy efficiency measures. Layout and construction should be designed to maximise energy conservation and the use of passive solar gain. All mechanical and electrical systems should be as energy efficient as possible.
85. Consideration should be given to the insulation of plumbing systems, the use of low energy light fittings and appropriate heating and ventilation systems. Any opportunity for using energy from renewable sources should be considered.
86. Adequate and sensibly situated electrical outlets, switching and controls should be installed throughout the amenity building.
87. Economical heating systems should be installed throughout the amenity building that provide temperature controls suitable for room use, and capable of being individually controlled in each room. The overall heating, ventilation and insulation strategy must take into account the potential risk of condensation, mould growth etc. due to low usage.
88. The width of main entrances, doorways and passageways must comply with current NI Building Regulations to ensure mobility standards. Fixtures and fittings in the amenity building should be domestic but robust.
89. In line with standards for social housing, other recommended features include:
 - Sill heights in living/dining area no higher than 800mm above floor level;
 - Hot water taps to baths/showers with a thermostatically controlled supply;

Adequate screening and wall tiling where showers are provided over baths;

A worktop-cooker-sink-worktop sequence that is not broken by doors, passageways or tall units;

A 1.2 metre run of worktop between the cooker and the sink;

A 500 mm minimum worktop each side of the cooker and wall units set back minimum 100 mm;

A space for additional equipment such as a microwave;

Walls in bathrooms and WCs designed to take support aids;

Smoke/fire and heat detectors; and

A carbon monoxide detector.

The NIHE have reported that Communal facilities do not work in practice as evidenced in a number of sites in Northern Ireland. Nevertheless, provision of a communal building could be considered on sites large enough for a diverse community of residents rather than one extended family, where need has been explored in consultation with the Travellers to be accommodated and where a site is isolated from local facilities either by distance or a lack of public transport facilities. This facility can be an important resource in sustaining a more remote site, offering an opportunity for visits by health visitors, youth workers and education services as well as use by site management and residents alike.

Other on site facilities

90. The standard for other on site facilities applied by NIHE on serviced sites is through the provision of pitch specific facilities, following a resident centred approach.

91. The provision of a communal building is recommended within the Equality Commission for Northern Ireland's [Outlining Minimum Standards for Traveller Accommodation document](#).²⁴

92. Any such building should include:

A community room

Toilets (male and female)

A kitchenette.

Ideally it should be situated towards the front of the site, accessible to all the community not just site residents and if promoted and managed well can help encourage good relations between Traveller and neighbouring communities.

²⁴ Outlining Minimum Standards for Traveller Accommodation, ECNI, March 2009, Page 88.

Lighting

93. Sufficient lighting must be provided on the site to enable safe access and movement through the site at night for both pedestrians and vehicles having regard to the density and overall layout of the site. External lighting should also be provided on amenity buildings to ensure safe access. All lighting installations and fittings should be vandal and tamper proof.
94. Street lighting arrangements should be planned to minimise the risk of damage through vandalism and avoid problems of light pollution to homes on the site through light shining directly into caravans or amenity buildings. It should be planned to properly illuminate access roads and access to residential pitches.
95. Any play area for children should receive special attention in terms of appropriate lighting.
96. Consideration could be given to using three quarter length light pillars where there is a prospect the site may create light pollution for neighbouring sites.

Postal Arrangements

97. The site should be designed so that post can be delivered separately for each

pitch. Each residential pitch should have a secure post box accessed by a key held by the pitch resident.

98. Experience has shown that postal deliveries to pitches can be disrupted by complaints about harassment by unrestrained dogs so the provision of an individual box at the entry to a pitch would be advisable. Where delivery to individual pitches is not possible, a 'pigeon hole' system near the entrance to the site or on a site office wall should be considered. This must have lockable individual boxes for each pitch.
99. Consultation has shown that a simple but important element in helping to avoid discrimination against the residents of a Traveller site is to allocate site and pitch addresses which are of a similar nature to those for the settled community and which do not highlight that the accommodation is site based.

Waste Disposal

100. Travellers should receive the same waste disposal arrangements as the settled community. Domestic waste disposal must be provided for each pitch in accordance with the local council requirements. A key element in designing the layout of the site is to ensure sufficient space exists for

refuse collection vehicles to reach an appropriate point from which waste can be collected from individual pitches, as well as any communal refuse areas.

101. The site provider/owner should consider the environmental impact of the site and measures that might be taken to improve sustainability. For example, the inclusion of separate identifiable containers for the collection of recyclable waste.
102. Communal refuse areas can encourage fly-tipping and the accumulation of non-domestic waste. If a communal refuse area is necessary (in addition to refuse collection for each pitch), this should be designed and located to be convenient, accessible, robust, non-combustible and inconspicuous. It should be located away from individual pitches and from access points to the site to ensure that fire service vehicles can enter the site and deal with any fire that might break out.

Space for Work and Animals

103. Paragraph 6.144 of the Strategic Planning Policy Statement (SPPS) allows for workspace to be provided 'where

appropriate'. Providing areas for work on a Traveller site can be problematic for residents and the overall foot print of the site. The provision of facilities for some level of activity will be considered on a case by case basis having due regard to planning, environmental and health and safety considerations.

104. Where there is demand for space for non-domestic animals this demand should also be dealt with on a case by case basis in consultation with the Travellers and the neighbouring community as it will impact on residents and the overall foot print of the site.

Office premises

105. Where there is a demand for a site managers office for example on a larger site, this should ideally be in a location which can be easily found by visitors, preferably at the front of the site to ensure that it has a view which increases security but is not intrusive to residents. Facilities that may be needed include an office area, storage space, and kitchen and bathroom facilities.²⁵

²⁵ Office premises buildings must meet the requirements of the current Building Regulations. SCHEDULE 2 Regulation 4 details CLASSES OF EXEMPTED BUILDINGS. <http://www.buildingcontrol-ni.com/assets/pdf/building-regulations-ni-2012.pdf>

SITE SERVICES

Scope to Provide Essential Services

106. All sites must be provided with access to mains water, electricity supply, drainage and sanitation.

Water supply

107. A mains water supply suitable for drinking must be provided for each pitch, sufficient to meet the reasonable demands of residents. All work relating to water supplies should only be carried out by persons who are qualified in the particular type of work being undertaken and in accordance with current legislation and British Standards.²⁶

108. Water pressure must be sufficient to meet NIFRS requirements as referenced at page 12. Fire Safety.

109. Outside taps and hook up points for caravans should be provided on each pitch with internal isolation valves and suitable backflow protection for security of the water supply.

Electricity supply

110. Mains electricity to each pitch is essential, sufficient to meet the reasonable requirements of the residents, and with separate meters for each pitch. Ideally pre-paid card electricity meters will be provided in amenity buildings for each pitch by the relevant supplier and must be for domestic usage. Each Traveller household is responsible for their own electricity account.

111. Underground cabling must be adequately earthed and comply with current electrical installation regulations. Installations must be inspected annually and all electrical work carried out by competent / appropriately qualified personnel in accordance with the current IEE Wiring Regulations and to the satisfaction of Northern Ireland Electricity (NIE).

Connection points

112. Consideration may be given to providing more than one electricity and water access point on each pitch to allow for trailers to be realigned either through resident's choice, family expansion or to cater for visitors.

²⁶ The Utility Regulator lays down service standards for Northern Ireland Water and details can be found on its website at <https://www.uregni.gov.uk>.

Gas supply

113. It is essential that gas installations, supplies and storage meet all statutory requirements, relevant standards and codes of practice. Storage facilities that comply with health and safety regulations for Liquid Propane Gas cylinders must be provided. As the guidance on storage is complex, the site provider/owner should seek advice from local environmental health services. It is essential any mains gas installation is inspected annually and certified as safe.

114. Provision of a mains gas supply is recommended for amenity buildings on pitches and, if supplied, must comply with current gas installation regulations.

Oil fired central heating

115. Installations for oil fired central heating should meet current NI Building Regulations together with appropriate storage and safety arrangements in case of oil leaks.

Drainage

116. Surface water and storm water drainage must be installed. All drainage must accord with current legislation, Building Regulations and British Standards. This should be given early consideration in

both site selection and scheme design. All drainage work should only be carried out by persons who are qualified in the particular type of work being undertaken and in accordance with current legislation and British Standards.

117. It is recommended that gully and manhole covers are robust and secure. If individual caravans are connected to the drainage system the connections must be capable of being sealed when not in use.

118. Smaller drain covers could be considered as these can assist in preventing foreign objects becoming accidentally lodged in soakaways and gulleys.

119. Traveller sites may offer opportunities for implementing a Sustainable Drainage Systems approach for dealing with surface water management where surface water runs off to either natural water courses or municipal systems. The provision of water butts is recommended.

120. Consideration should be given to the inclusion of interceptors to ensure protection against petrol, oil and other substances entering the surface water drainage system.²⁷

Sewerage

121. Sewerage for permanent sites should normally be through mains systems.

122. Each pitch should be connected to a public mains sewer when it is economic to do so. In some locations this may not be possible and in that case alternative arrangement can be made, such as a properly constructed and regulation compliant, sealed septic tank sewage system. Consent to Discharge must be sought from the Northern Ireland Environment Agency (NIEA) where it is

proposed to discharge from a septic tank to a waterway, or underground stratum. All sanitation provision must accord with current legislation, NI Building Regulations and British Standards. All sewerage work should only be carried out by persons who are qualified in the particular type of work being undertaken and in accordance with current legislation and British Standards.

123. Consideration should also be given to additional waste disposal connections from resident caravans to avoid problems over unauthorised connections.

²⁷ The purpose of an interceptor is to separate water coming from the drainage system from any contaminants picked up on-route such as oil, silt, dirt and brake dust. Petrol interceptors intercept oil and petrol contained in the storm water runoff from hard standing

Transit Sites

The Site

124. The guidance for serviced sites applies in relation to surrounding land use and health and safety considerations.

125. **Site Location / Selection** - The guidance for permanent sites largely also applies except that the proximity to community facilities is primarily in respect of the need for access to schools. The presence of children on the site, and potential health and safety risks for them and other residents should receive equal consideration.

Site Design

126. The guidance for serviced sites applies in relation to site boundaries, layout of pitches, orientation of pitches, site access and roadways, access for emergency vehicles, site security and hard standing.

127. **Number of pitches** – no more than 6-8 pitches is the recommended number of pitches on a site. In exceptional circumstances where larger sites are proposed, the number of pitches should not normally exceed 15-20.

128. **Size of pitch** - Wherever possible each pitch should be of a size sufficient to accommodate two touring caravans, two parking spaces and private amenities.

129. **Car Parking** - It is recommended that parking space for at least two vehicles is provided on each individual pitch at a minimum size of 2.4m x 4.8m each.

130. **Landscaping** - The guidance for serviced sites applies although soft landscaping on transit sites can be more difficult to maintain. As these sites are only intended for short stays there is less need for soft landscaping but the general ambience of the site should be maintained to a limited and cost effective degree.

Site Facilities

131. The guidance for serviced sites applies in relation to private amenities, lighting, cleaning and laundry facilities, space for work and animals.

132. Depending on the degree of usage, portable facilities may be provided to meet additional need and these should

²⁸ Adequate spacing in accordance with DfI, Model Licence Conditions 2019, Caravans Act (NI) 1963, Section 5 available at <https://www.infrastructure-ni.gov.uk>; NIFRS, A Fire Safety Guide for Caravan Site Operators available at <https://www.nifrs.org>

be well managed and maintained. Where sites are empty for lengthy periods and to avoid vandalism to facilities these should be removed until the site is reoccupied. Permanent waste and water points should be in place to reduce the cost of use of contractors to manage the facilities.

133. **Waste disposal** - Waste disposal for individual pitches is recommended. Communal refuse disposal should be provided which is convenient (but away from pitches and associated dwellings), fenced off, robust and inconspicuous.

134. **Sluice** – Provision of a sluice should be considered on each site.

Site Services

135. The guidance for serviced sites applies in relation to water supply, drainage and sewerage.

136. **Electricity supply** - The guidance for serviced sites applies although in practice a central electricity supply administered by the site management may be provided which would entail residents paying by meter.

137. **Gas supply** – Mains gas supplies are not applicable to transit sites.

Emergency Halting Sites

THE SITE

Site Location / Selection

138. Emergency halting sites should provide safe and convenient access to road networks and cause minimum disruption to surrounding communities.

139. When considering the suitability of different sites, the potential presence of young children and any risks from adjoining land uses must be considered.

Site Layout, Access and Orientation

140. It is important to provide markings or barriers to encourage residents to park safely, allow access for emergency vehicles and enable maximum use of the site in accordance with its intended capacity and fire safety standards. Particular regard must be given to the need to ensure a safe distance between trailers/caravans and other structures made of combustible materials. Emergency Halting Sites Stopping places should be designed to ensure there is a separation of 6m between trailers/caravans to reduce the risk of fire spread.

141. The road to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers.

142. There must be a clear barrier around the emergency stopping place to prevent unauthorised expansion of the site. Boundaries to be in keeping with surrounding area.

Site Facilities and Services

143. It is essential for a cold water supply to be provided for the use of site residents which may be by use of water standpipe or water bowser.

144. Appropriate number of portable toilets must be provided and there must be separate provision for men and women. Consideration should also be given to the provision of portable showers.

145. It is essential for a sewerage disposal point to be provided.

146. Refuse disposal facilities must be provided.

Management Standards

147. Successful sites are safe, well maintained and well managed. Achieving this depends on managing the physical assets effectively and appropriately. With the right management structures, people who live and use the place will be able to influence what happens there. The success of developments is sustained by active support and resources that enable them to function effectively.

148. Across the range of accommodation types, effective maintenance and respectful management that is sensitive to the Travellers' cultural needs are essential for ensuring the long term sustainability of a Traveller development. Cultural awareness training may be required. These elements can also be critical success factors in building the support of the local community for a Traveller site.

149. To help local communities accept authorised sites, they will need to see that provision in their area is proportional to need and matched by provision in other areas; and that sites are managed in a way that avoids, or remedies quickly, any negative impact on neighbouring areas.

150. It is recommended that, from the beginning, a site management and maintenance plan is in place along with sensible, transparent rules around allocation of pitches. This will help ensure residents live in a safe and secure environment. The plan should be flexible and pay particular attention to the involvement and participation of site residents in the management and maintenance of the site. In addition the plan should have regard to best practice in housing management guidelines.

151. There are no specific legal requirements for the management of Traveller sites in Northern Ireland. However the principles of effective management of accommodation apply in a similar fashion to Traveller sites as to other forms of social housing, and these are set out below.

- Ownership of responsibility for site management should be clear, whether this is NIHE or, in future, contracted out to a housing association, a private company, a voluntary or community organisation or to Travellers living on site.
- It is recommended that each site should have a designated officer who can be contacted by residents as necessary. The designated officer

would be a member of the local district office staff in which a particular site is located. The designated officer may have responsibility for a number of sites, and where this is the case, or where the officer does not live on site, regular visits – at least twice a week – should be made to the site.

- The designated officer should familiarise him/herself with the families living on a site, through direct engagement with residents, with the licensing agreement, payment procedures, etc. The designated officer should play a proactive role in the management of the site and be visible to residents and approachable.
- The designated officer has a central role in preserving health and safety standards on site. This must be carried out proactively, and in discussion with residents, who should know and understand the benefits of measures in place to protect their health and safety.
- The publication of an Allocations Policy presented in oral and written form to residents, is an important step in building trust between residents and management. Allocation of pitches should not take place informally,

but should follow the terms of the allocations policy to ensure fairness in approach. An appeals process should be available to residents who wish to challenge a decision.

- It is recommended that site residents are consulted when deciding management arrangements. Residents should be invited and encouraged to play a central role in the way the site is run. Travellers should be asked about their preferred methods of consultation, and these should be accommodated wherever possible.
- Effective and efficient repair and maintenance is a central obligation on site management, and will play an important role in the smooth operation of the site. A contact number should be provided for residents to report faults either to their own pitches or communal areas. A management plan should have a programme of planned maintenance as well as contingencies for reactive maintenance. A clear management structure should be included and relevant contacts in appropriate departments identified.

Key Documents

Annex A

Caravans Act (Northern Ireland) 1963 as amended by the Caravans Act (Northern Ireland) 2011 - An Act to amend the law relating to caravans and caravan sites.

<http://www.legislation.gov.uk/nia/2011/12/contents>

Disability Discrimination Act 1995, as amended by the Disability Discrimination (NI) Order 2006. <http://www.legislation.gov.uk/ukpga/1995/50/contents>

Race Relations (Northern Ireland) Order 1997- Where Irish Travellers were specifically identified as a racial group protected against unlawful discrimination. <http://www.legislation.gov.uk/nisi/1997/869>

Northern Ireland Act 1998- Specifically section 75 which requires Public Authorities to promote equality of opportunity between persons of different racial groups. <http://www.legislation.gov.uk/ukpga/1998/47/contents>

DOE New Policy on Accommodation for Travellers 1999- Although the responsibility for Traveller accommodation remained within the remit of local Councils this policy gave the NIHE a more strategic role.

Promoting Social Inclusion Working (PSI) Group on Travellers Report 2002- Highlighted the various needs of the Traveller communities and helped push their issues higher up the Governments agenda. Office of the First Minister and Deputy First Minister responded to this report in A Response to the PSI Working Group Report on Travellers.

Housing (Northern Ireland) Order 2003 - Led to the transfer of 6 sites from local Councils and gave NIHE responsibility to both manage and provide suitable accommodation, including transit sites. <http://www.legislation.gov.uk/nisi/2003/412/contents/made>

Unauthorised Encampments (Northern Ireland) Order 2005 - NIHE now deal with all reported Unauthorised Encampments in conjunction with PSNI under a joint protocol. <http://www.legislation.gov.uk/nisi/2005/1961/contents>

Outlining Minimum Standards for Traveller Accommodation, March 2009, Equality Commission for Northern Ireland http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/Traveller_Accommodation-Outlining-Minimum-Standards.pdf

Annex A

Designing Gypsy and Traveller Sites- Good Practice Guide, May 2008, DCLG

Model Standards 2008 for Caravan Sites in England Caravan Sites and Control of Development Act 1960 – Section 5, Communities and Local Government
<http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/modelstandards2008.pdf>

Regional Development Strategy 2035, Building a Better Future, March 2012, Department for Regional Development (RDS) now the Department for Infrastructure (DfI). <https://www.infrastructure-ni.gov.uk/publications/regional-development-strategy-2035>

All-Ireland Travellers Health Study, September 2010, University College Dublin. <http://www.ucd.ie/news/2010/09SEP10/030910-shorter-life-expectancy-and-higher-suicide-rates-among-Travellers-study-shows.html>

Department of the Environment, Planning Policy Statement 12: Housing in Settlements, Policy HS 3 (Amended) Travellers Accommodation, January 2013. Available at https://www.planningni.gov.uk/index/policy/planning_statements_and_supplementary_planning_guidance/final_policy_hs_3_amended___Travellers_accommodation_.pdf

Planning Policy for Traveller Sites, DCLG, March 2012 was revised and replaced by Planning Policy for Traveller Sites, August 2015.

Travellers Accommodation Needs Assessment 2014, NIHE. <https://www.nihe.gov.uk/getmedia/8228725d-b5f2-468f-a37c-bd03ba6a9959/traveller-accommodation-needs-assessment-2014-published-march-2015.pdf.aspx?ext=.pdf>

Designing Gypsy and Traveller Sites- Guidance, May 2015, Welsh Government. <https://gov.wales/sites/default/files/publications/2019-03/designing-gypsy-and-traveller-sites.pdf>

Department of the Environment, Strategic Planning Policy Statement (SPPS), Planning for Sustainable Development, published September 2015. Available at https://www.planningni.gov.uk/index/policy/spps_28_september_2015-3.pdf

Northern Ireland Human Rights Commission, "Out of Sight, Out of Mind": Travellers' Accommodation in NI, March 2018. Available at <https://www.nihrc.org>

The Department for Infrastructure, Model Licence Conditions 2019, Caravans Act (Northern Ireland) 1963, Section 5 available at <https://www.infrastructure-ni.gov.uk/sites/default/files/consultations/infrastructure/model-licence-conditions-2019-consultation.PDF>

Northern Ireland Fire and Rescue Service, A Fire Safety Guide for Caravan Site Operators, version date 6 November 2018. Available at <https://www.nifrs.org>

Additional Copies

Additional copies of this document can be obtained from:

Supported Housing Branch
Department for Communities
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