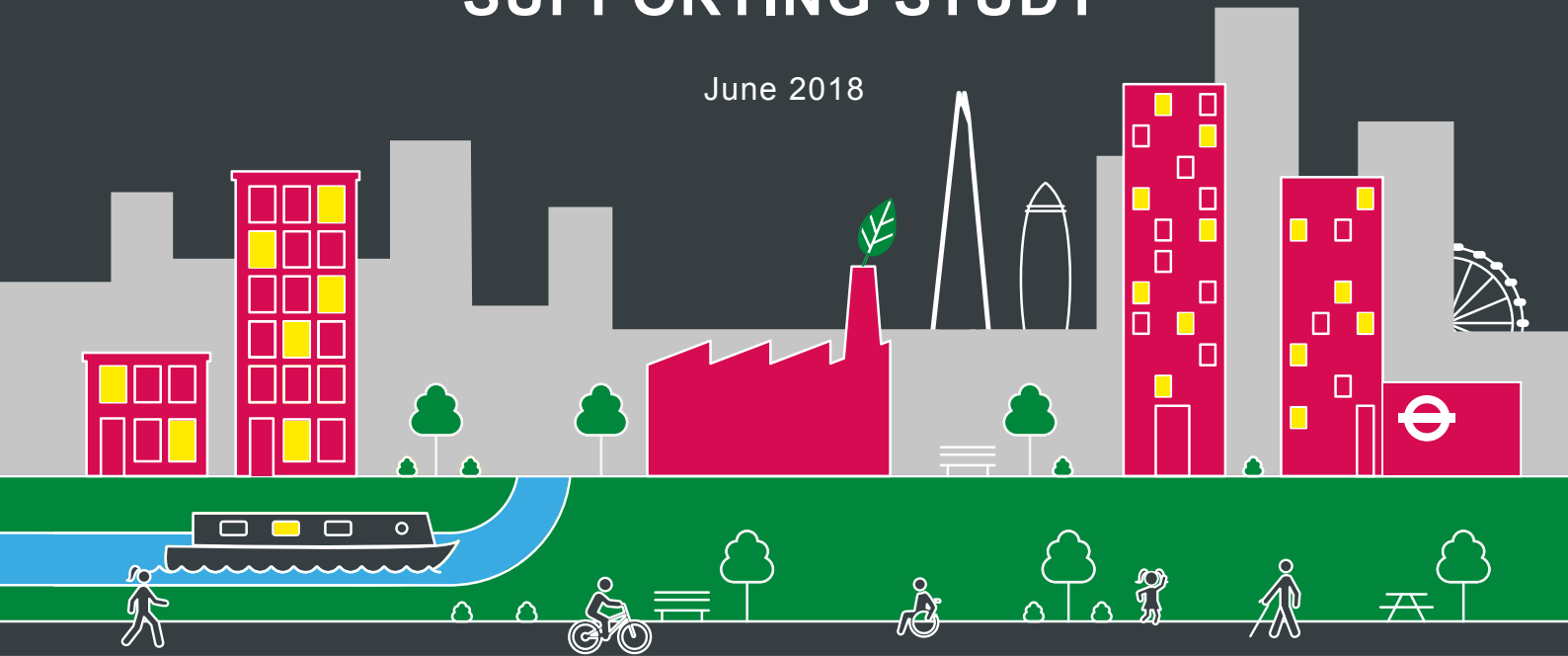


# Gypsy and Traveller Needs Assessment - Addendum

## LOCAL PLAN SUPPORTING STUDY

June 2018



## **Addendum to Gypsy and Traveller Accommodation Assessment February 2018**

### **1.0 Introduction**

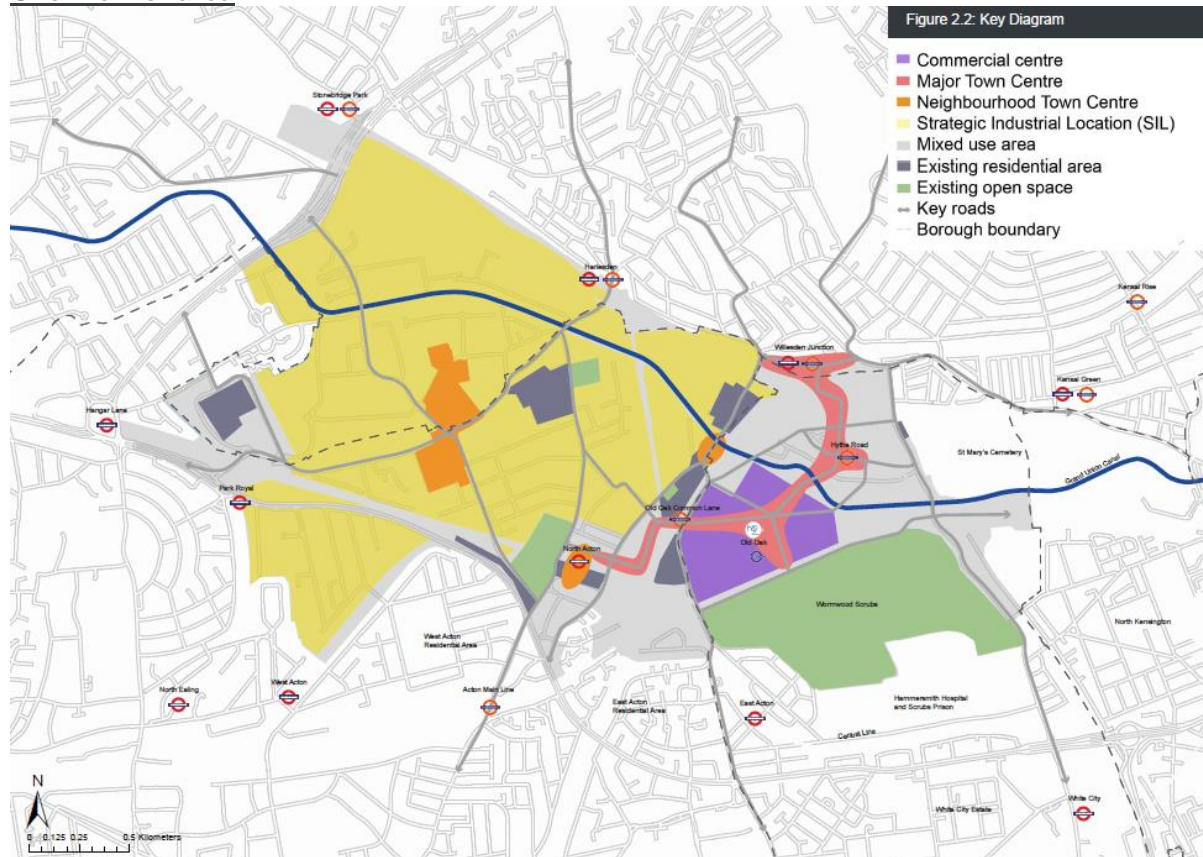
- 1.1 There is one permanent Gypsy and Traveller Site within OPDC's boundaries at Bashley Way, Park Royal. This site is owned by the London Borough of Ealing and consists of 22 authorised and occupied pitches. OPDC's Gypsy and Traveller Accommodation Needs Assessment (GTANA) identified that there was no need for additional pitches during the Local Plan period, in accordance with guidance on completing GTANAs and the Planning Policy for Traveller Sites (PPTS).
- 1.2 The Royal Borough of Kensington and Chelsea (RBKC) and London Borough of Hammersmith and Fulham (LBHF) are jointly responsible for one permanent site, Stable Way, which comprises a total of 20 pitches, of which one is taken up by 'The Hut' community centre, resulting in 19 available authorised pitches. The site previously fell within LBHF's administrative boundary until a boundary change in 1995 and now falls within RBKC's administrative boundary.
- 1.3 The Joint RBKC and LBHF GTANA has identified a need for 9 pitches between 2016 to 2030. The councils have jointly prepared a framework methodology to appraise sites to meet the identified needs of the Gypsy and Traveller community. The methodology seeks to adopt a similar approach used for determining deliverable and developable housing sites in the National Planning Practice Guidance on Housing and Economic Land Availability Assessments. The approach to identifying appropriate sites is to determine if the site is:
- available for a Gypsy and Traveller site;
  - suitable for Gypsy and Traveller development;
  - achievable (i.e. deliverable within 5 years and viable);
  - developable (i.e. in a suitable location with reasonable prospect that the site is available could be viably developed at the point in time envisaged); and
  - consideration is also given to the specific accommodation and lifestyle requirements of Gypsies and Travellers.
- 1.4 This addendum uses the same methodology to assess the potential for sites within the OPDC area to help to meet the need identified in the Joint GTANA. In summary, it identifies that there is no capacity within the OPDC area for additional pitches to meet the needs of the Gypsy and Traveller community.

### **2.0 Overview of area**

- 2.1 The Mayor has established the Old Oak and Park Royal Development Corporation (OPDC) to drive forward regeneration of this area. OPDC's Local Plan recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential and bring tangible benefits for local communities and Londoners.
- 2.2 The OPDC area covers a total of approximately 650 hectares and today is predominantly Strategic Industrial Location (SIL), with some small residential communities. Considering the future excellent national, regional and local public transport links to be provided in the OPDC area, the London Plan has designated Old Oak and Park Royal as Opportunity Areas with the capacity to deliver 25,500 new homes and 65,000 new jobs.
- 2.3 Broadly, OPDC consists of three distinct land-use areas:
- Park Royal Industrial Estate (SIL);

- The core development area of Old Oak which is being strategically de-designated from SIL through OPDC's Local Plan; and
- Wormwood Scrubs, a Metropolitan Park, which also benefits from Metropolitan Open Land (MOL) designation and is also protected through its own Act of Parliament, the Wormwood Scrubs Act 1879.

### Overview of area



## 3.0 Strategic Industrial Location

3.1 Park Royal (228 hectares) is a strategically-important industrial estate for the functioning of London's economy and in accordance with the London Plan and Local Plan, should be protected, strengthened and intensified. London needs Park Royal to function efficiently and supply the population and other businesses with goods and services, whilst also accommodating any future manufacturing and servicing activity that needs to remain in the capital. It is one of the few areas in London that can accommodate uses, including industrial activities, operating 24 hours a day and creating noise, which can lead to land use conflicts elsewhere.

3.2 In line with the London Plan, industrial uses within SIL should be protected to accommodate the following broad industrial type activities:

- light industrial (Use Class B1c);
- general industrial uses (Use Class B2);
- storage and logistics/distribution uses (Use Class B8);
- other industrial-type functions including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets and recycling;
- flexible B1c/B2/B8 premises suitable for occupation by SMEs;

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- small scale walk to services for industrial occupiers such as workplace creches or café.

3.3 Development in SIL for other uses, such as residential developments, are not permitted, except in areas released through a strategically coordinated process, such as being de-designating through a Local Plan.

3.4 As an Opportunity Area in the London Plan, Park Royal is required to deliver 10,000 new jobs as part of OPDC's overall target to deliver 65,000 jobs. This requires the strengthening and intensification of employment uses within the Park Royal Industrial Estate.

3.5 The existing Gypsy and Traveller Site at Bashley Road site is an anomaly as it is located within SIL. In accordance with the Local Plan, OPDC will protect the site for its current use. The site has also been considered for additional Gypsy and Traveller accommodation in section 6. Apart from this specific site, given the planning restrictions on SIL and the need as an Opportunity Area to provide 10,000 jobs, it is not considered appropriate to allocate land within Park Royal SIL for the purposes of providing pitches for the Gypsy and Traveller community.

### **4.0 Core development area**

4.1 The core development area of Old Oak is being strategically de-designated from SIL through OPDC's Local Plan. Old Oak is one of London's most significant brownfield locations with the development capacity to accommodate significant new housing (including affordable housing), commercial development, social and physical infrastructure, linked to planned improvements in public transport connectivity and capacity.

4.2 The London Plan has identified the Old Oak Opportunity Area as having the capacity to provide at least 24,000 new homes and 55,000 jobs. Housing development at this scale will be high density with tall buildings with town centre, commercial and associated social infrastructure uses. The form of development required for Gypsy and Traveller accommodation is unlikely to be compatible with the aspiration to deliver this kind of development to help meet local and London housing needs.

4.3 The core development area is also very complex with significant requirements for funding and physical infrastructure to unlock sites for re-development for housing. The site is in multiple ownerships and will require complex land assembly. Given these circumstances, it will be difficult to bring forward sites for Gypsy and Traveller accommodation. As a strategic Opportunity Area, it is not considered appropriate to allocate land within the core development area for the purposes of providing pitches for the Gypsy and Traveller community.

### **5.0 Wormwood Scrubs**

5.1 Part of OPDC's area, approximately 67 hectares, contains Wormwood Scrubs. This is classified in the London Plan as Metropolitan Open Land (MOL) and a Metropolitan Park. MOL is afforded the same protection as the Green-belt which means keeping land permanently open and to enhance the beneficial use, such improving access; opportunities for outdoor sport and recreation etc. Wormwood Scrubs also benefits from the Wormwood Scrubs Act 1879 which sets out provisions to ensure the open space is made available in perpetuity for all Londoners.

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5.2 As MOL, it is not considered appropriate to allocate land within the Wormwood Scrubs area for the purposes of providing pitches for the Gypsy and Traveller community.

### 6.0 Site assessments

6.1 As part of the Joint GTANA conducted by RBKC and LBHF, Gypsy and Traveller survey respondents were asked if they knew of any potentially suitable sites or locations/land within LBHF that could be considered appropriate for designating as Gypsy and Traveller accommodation. The respondents identified two areas which are also located within the OPDC area. The following site assessments have been undertaken:

1. The existing Bashley Road Gypsy and Traveller Site within OPDC's area has been assessed for extra capacity for pitches;
2. "Scrubs Lane - waste land", identified in the Joint GTANA: it is assumed that this refers to the waste sites on Scrubs Lane known as Mitre Yard; and
3. "Scrubs Lane – grassland" and "Scrubs Park, Scrubs Lane", identified in the Joint GTANA: it is assumed that this refers to Wormwood Scrubs.

6.2 The site assessments are summarised in the table below and shown in full in appendix 1.

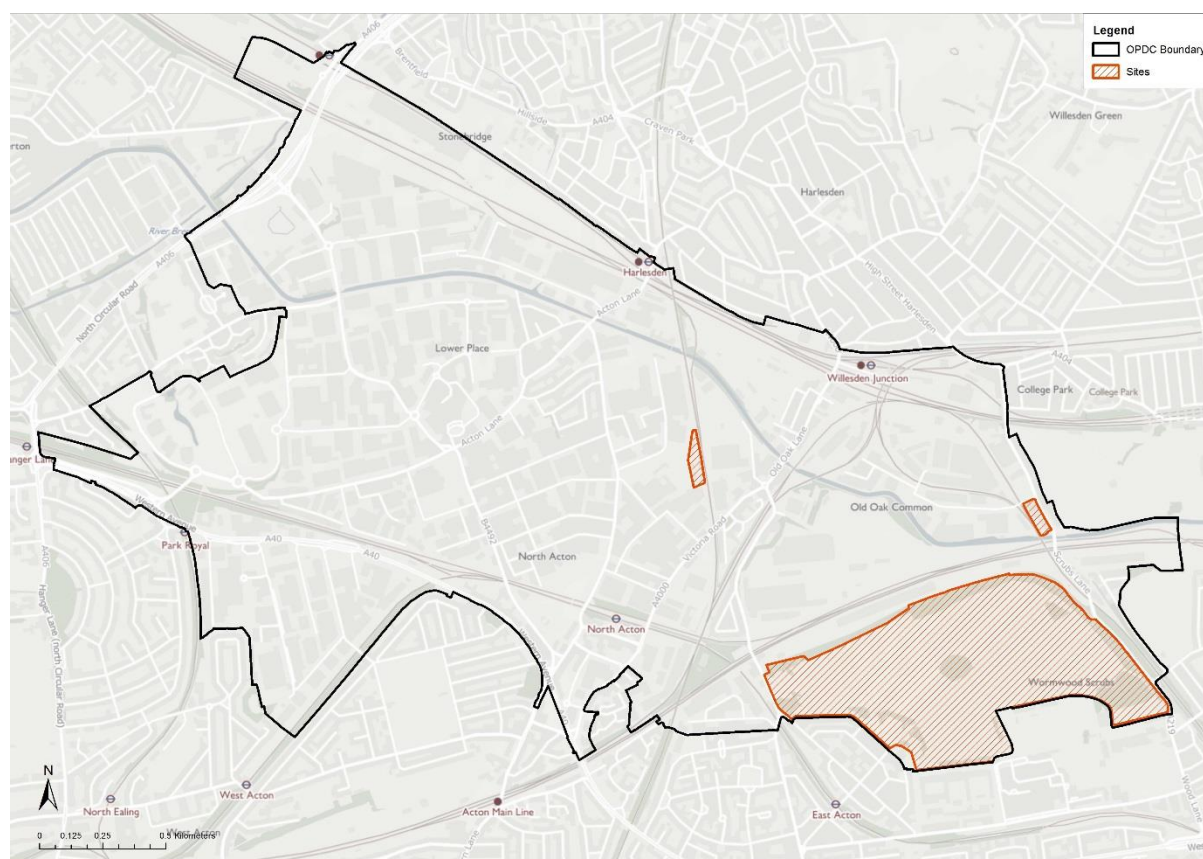
Site ref	Suitability	Availability	Achievably	Conclusion and next steps
1	Not considered to be suitable for additional Gypsy and Traveller accommodation. The site is constrained by being contained within SIL which would prevent the site from being expanded. The shape of the site limits the ability to reconfigure to increase the number of pitches.	The site is available for Gypsy and Traveller accommodation.	Further pitch provision is not currently deliverable due to the physical constraints of the site being within SIL.	This is a fully occupied and existing site with no potential for additional pitches within the boundary and because there is no possibility to expand the site as it is located within SIL
2	The site is within the Old Oak Opportunity Area. The site has a minimum homes capacity of 200 in OPDC's Development Capacity Study. A permission has been agreed,	The site is unlikely to be available for development as Gypsy and Traveller accommodation as the site benefits from an extant planning permission and the developer wishes	The site is not achievable for Gypsy and Traveller accommodation. This is because the site benefits from an extant planning permission, is in the Old Oak	The site is not suitable, available and achievable. It has been identified as having a capacity to provide 200 homes in OPDC's Local Plan. It is part of the Old Oak Opportunity Area,



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Site ref	Suitability	Availability	Achievably	Conclusion and next steps
	subject to legal agreement, for these homes to be delivered. The site is not therefore suitable for development as Gypsy and Traveller accommodation.	to comprehensively develop the site into 200 homes with non-residential floorspace and active frontages.	Opportunity Area and has a Local Plan site allocation for 200 homes.	which has a London Plan target to deliver 24,000 homes. The site has a planning permission, which can be reasonably be expected to be built out.
3	The site is not suitable for Gypsy and Traveller accommodation. It is protected as open space as designated MOL.	The site is not available for Gypsy and Traveller accommodation as it is MOL.	The site is not achievable for Gypsy and Traveller accommodation as it is MOL.	The site is not suitable, available or achievable. Wormwood Scrubs' roles are reflected in its designations and statutory protections.

### Sites assessed for Gypsy and Traveller Accommodation



Appendix 1

<b>Site ref: 1</b>	<b>Bashley Road Gypsy and Traveller Site, LB Ealing</b>
Landowner	London Borough of Ealing
Agent	N/A
Site area (ha)	0.84 ha
Site origin	Existing Gypsy and Traveller accommodation site Desktop research/ OPDC GTANA
Estimated capacity	0 additional pitches, all pitches are currently occupied. There are 24 pitches in total. 1 pitch is currently acting as a double pitch for an extended family.
<b>Suitability</b>	
Existing use	This is an existing Public Gypsy and Traveller site which opened in 1985. It is situated within the London Borough of Ealing which owns the site and is managed on behalf of the council by Oxfordshire County Council.
Site description	The site is self-contained and within the Park Royal Industrial Estate Strategic Industrial Location (SIL). The site is surrounded by SIL Industrial uses and railway. Access is at the end of Bashley Road which has access to Chase Road which leads into North Acton town centre or North Acton Lane then Acton Lane which leads into Harlesden town centre.
Proximity to existing Gypsy and Traveller community and settled community	This is an existing site with an existing Gypsy and Traveller community living here. The nearest bricks and mortar residential area is the Wesley Estate, approximately 532m away.
National/Lond on policy	Residential uses would not normally be appropriate on SIL land which is protected for industrial related uses in the London Plan.

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Local Policy	Policy P4 protects the Bashley Road Gypsy and Traveller Site for its current use in line with Policy H8 on Gypsy and Traveller accommodation. The site is also protected by LB Ealing's extant Local Plan.
Planning History	Planning permission was granted in 1985 for its current use. <a href="https://pam.ealing.gov.uk/online-applications/propertyDetails.do?activeTab=relatedCases&amp;keyVal=NOJREN00DT00S">https://pam.ealing.gov.uk/online-applications/propertyDetails.do?activeTab=relatedCases&amp;keyVal=NOJREN00DT00S</a>
Impact on local character / Townscape	The site is located within Park Royal West (Place Policy P4) which is in Park Royal SIL and is a location for a range of small, medium and large businesses. There are pockets of existing residential communities and planning permission has been granted for high density residential development at First Central which is in the Brewery Cluster to the southwest of Park Royal Centre and is outside of SIL.
Ecological and biodiversity impacts	Given the nature of the site, redevelopment would not have any significant ecological or biodiversity impacts.
Trees	There are no trees on the site.
Heritage	There is a limited number of historically significant buildings in the area and none are situated adjacent to the site.
Safety	The site is relatively isolated at the end of Bashley Road and surrounded by industrial uses which could cause personal safety concerns for residents at night.
Flooding and drainage	The south and north of the site is predicted to be at a risk of surface water flooding (1 x in 200-year surface water flood risk > 0.1m). Issues have been raised through the Local Plan consultation about how drainage on the site can be improved.
Access to local Services	Central Middlesex Hospital is approximately 1km away from the site. The nearest primary school is Old Oak Primary, approximately 1.3 km away and the nearest secondary school is Woodlane High School, approximately 2km away, both within LB Hammersmith & Fulham. The nearest shopping facilities are in North Acton town centre approximately 1km away. Employment opportunities can be found within Park Royal Industrial Estate.
Utilities infrastructure	The site is connected to utilities infrastructure.
Physical Constraints	Access to the site is constrained as there is only one route via Bashley Road. The site is narrow and constrained by railway on the east side. There is no potential for expansion beyond the existing boundary into the surrounding industrial uses as the area is protected within Park Royal SIL.
Public Transport	The Public Transport Accessibility Level (PTAL) rating is low: - 1b.
Air quality / noise	Given the industrial location there may be air quality and noise impacts for existing occupiers. Any development would have to comply with Local Plan policies
Suitability Conclusion	This site is not considered to be suitable for additional Gypsy and Traveller accommodation. The site is constrained by being contained within Park Royal SIL which would prevent the site from being expanded. The shape of the site limits the ability to reconfigure to increase the number of pitches.



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Availability	
Is the site available for Gypsy and Traveller use?	LB Ealing owns the site and is supportive of its continued use as a Gypsy and Traveller site and has protected the site for its current use, as has OPDC.
Availability conclusion	The site is available.
Achievability	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	There are potential additional costs to be met by the landowner associated with implementing drainage mitigation measures and assessing air quality and noise mitigations. These are unlikely to raise significant costs or prevent development. Further pitch provision is not currently deliverable due to the physical constraints of the site being in Park Royal SIL.
When could the site be delivered?	N.A
Achievability conclusion	Further pitch provision is not currently deliverable due to the physical constraints of the site being in SIL.
<b>Overall conclusion</b>	<b>This is a fully occupied and existing site with no potential for additional pitches because there is no possibility to expand the site as it is located within the Park Royal protected SIL.</b>

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<b>Site ref: 2</b>	<b>Waste Site know as Mitre Yard, LB Hammersmith And Fulham</b>
Landowner	City and Docklands Ltd
Agent	Quod
Site area (ha)	0.58 hectares (0.53 hectares without access road)
Site origin	Joint GTANA
Estimated capacity	0 pitches
<b>Suitability</b>	
Existing use	Waste facilities comprising of a mixture of yard space and industrial buildings/structures.
Site description	The site comprises of two parcels of land located on the western side of Scrubs Lane. The sites are separated by a private service road, known as the haul road, used to access the Powerday and EMR sites. The service road also provides vehicular access to the southern parcel. The northern parcel is accessed directly from Scrubs Lane.
Proximity to existing Gypsy and Traveller community and settled community	The site is approximately 1.33km from the Bashley Road Gypsy and Traveller community and approximately 1.84km from Stable Way. The nearest bricks and mortar accommodation is at 45-57 Scrubs Lane and College Park, at approximate distances of 317m and 577m respectively.
National/London policy	The site currently falls within SIL. However, as set out in London Plan Policy 2.17 sites can be removed from SIL where they are part of a strategically co-ordinated process of SIL consolidation. The site falls within the Old Oak Common Opportunity Area, which is identified in the London Plan as having significant regeneration potential with capacity to accommodate a minimum of 24,000 new homes and 55,000 jobs centred

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	around a new public transport hub on the HS2 line, interchanging with the Great Western Main Line and Crossrail 1. OPDC's Local Plan is proposing to remove the SIL designation from the site and identify the site as a site allocation with the capacity for 200 homes.
Local Policy	The application site is not within the area proposed to be retained as SIL. Policy P10 of the Local Plan focuses on Scrubs Lane and supports the delivery of a range of mixed-use development to secure 1,100 new jobs and a minimum of 2,000 new homes along Scrubs Lane. The policy also supports the principle of developing clusters of active ground floor uses at key points along Scrubs Lane. The site falls partially within 2 clusters: Mitre Canalside and Hythe Road.
Planning History	Subject to legal agreement the site has permission for redevelopment for 200 homes (67 affordable homes – 35% by habitable room); 609sqm of flexible non-residential floor space <a href="http://planningregister.opdc.london.gov.uk/swift/apas/run/WPHAPPCRITE/RIA">http://planningregister.opdc.london.gov.uk/swift/apas/run/WPHAPPCRITE/RIA</a>
Impact on local character / Townscape	The surrounding area is currently mainly industrial in character. However, the area has been identified as capable of delivering high density development. Gypsy and Traveller accommodation would be a different character and scale to this. The closest houses are approximately 360 metres to the north along Scrubs Lane beyond the Cumberland Park Factory Conservation Area. Policy P10 of the Regulation 19 Local Plan supports the delivery of a range of mixed-use development to secure 1,100 new jobs and a minimum of 2,000 new homes along Scrubs Lane. The North Kensington Gate sites (North and South) on the opposite side of Scrubs Lane have planning permission pending for 211 homes.
Ecological and biodiversity impacts	To the south the site is bound by Mary Seacole Memorial Gardens a public open space which fronts onto the Grand Union Canal at Mitre Yard.
Trees	There are no trees on the site.
Heritage	The site is situated close to the Cumberland Park Factory Conservation Area 360m to the north on Scrubs Lane.
Safety	There is a haul road between the plots which would be considered to have the potential to present a safety concern to pedestrians and cyclists. However, for the foreseeable future the haul road will not be a thoroughfare for pedestrians and cyclists and therefore this minor breach of the comfort criteria is considered acceptable.
Flooding and drainage	The site is in Flood Zone 1 which means it is at minimal risk from tidal and fluvial flooding. The main potential source of flooding is therefore from surface water.
Access to local Services	Hammersmith Centre for Health which is a primary care facility in Hammersmith Hospital is within 1 km. Two nurseries and four primary schools within 1km of the site. There is also an all-through school within 1km and three secondary schools just over 1km from the site. The Scrubs Lane area includes a target to secure 1,100 jobs. The closest shopping area is Harlesden town centre, approximately 1.2km to the north.
Utilities infrastructure	The site requires new connections to utilities infrastructure.
Physical Constraints	The two sites are separated by a haul road which is going to continue to be in operation to service the Powerday and EMR waste sites.

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Public Transport	The current PTAL is 1B. The PTAL level of the site is expected to increase in the future because of planned rail improvements associated with the Old Oak Common HS2/Crossrail station as well as other public transport improvements in the area.
Air quality / noise	The operation of the access road could cause noise and vibration issues for future occupiers which would need to be mitigated by internal noise standards such as glazing. In terms of air quality for future residents whilst air quality standards along Scrubs lane are currently in breach of existing targets the assessment argues that future improvements to the emissions of vehicles will improve air quality standards to an acceptable level by the time the development is ready for occupation. However, LBHF Environmental Health officers have raised concerns that this might not be the case in practice and therefore mechanical ventilation may be required as part of the development to ensure that appropriate air quality is provided for future residents.
Suitability Conclusion	The site has a minimum homes capacity of 200 in OPDC's Development Capacity Study. A permission has been agreed, subject to legal agreement, for these homes to be delivered. The site is not suitable for development as Gypsy and Traveller accommodation.
<b>Availability</b>	
Is the site available for Gypsy and Traveller use?	The landowner is willing to comprehensively develop the land for residential led, mixed use high density development as evidenced in the Mitre Yard planning application.
Availability conclusion	The site is unlikely to be available for development as Gypsy and Traveller accommodation as the developer wishes to comprehensively develop the site into 200 homes with non-residential floorspace with active frontages.
<b>Achievability</b>	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	The site is complex and there are site constraints to overcome, including air quality and noise as described above. Given the current uses substantial remediation work would be required to develop the site. Whilst these may be overcome there is no market attractiveness for the delivery of Gypsy and Traveller accommodation on this site for the landowner/developer.
When could the site be delivered?	It is unlikely that the site could be delivered for Gypsy and Traveller accommodation due to the housing targets assigned to this site.
Achievability conclusion	The site is not achievable for Gypsy and Traveller accommodation.
<b>Overall conclusion</b>	<b>The site is not suitable, available and achievable. It has been identified as having a capacity to provide 200 homes as part of OPDC's Local Plan and is within the Old Oak Opportunity Area, which the London Plan identifies as having capacity to deliver 24,000 homes and 25,000 jobs, requiring a high-density approach to development. The site has planning permission which can be reasonably be expected to be built out.</b>



Site ref: 3		Wormwood Scrubs, LB Hammersmith And Fulham	
Landowner	London Borough of Hammersmith and Fulham, managed by Wormwood Scrubs Charitable Trust		
Agent	N/A		
Site area (ha)	67 ha		
Site origin	Joint GTANA		
Estimated capacity	N/A		
<b>Suitability</b>			
Existing use	Publicly accessible open space, Metropolitan Open Land (MOL)		
Site description	<p>At 67 hectares, Wormwood Scrubs is the London Borough of Hammersmith and Fulham's largest open space. The Scrubs has about 18 hectares of tree cover and 22 hectares of long grass meadow with almost 100 species of birds and 250 species of wildflowers (one sixth of the UK flora). Leisure facilities include play areas, walking/ cycling routes, sports pitches. Scrubs Lane is to the north and east. Little Wormwood Scrubs is east of Scrubs Lane and the Linford Christie Stadium, Hammersmith Hospital and HM Prison Wormwood Scrubs are located to the south. Old Oak Lane and Braybrook Street border the site to the west and southwest, Scrubs Lane borders to the east. Railway depots are located to the north,</p>		
Proximity to existing Gypsy and Traveller community and settled community Is the site in an isolated area?	<p>The site is approximately 1 km away from existing Gypsy and Traveller site in Bashley Road and approximately 1.74 km from the Joint RBKC/LBHF site in Stable Way. The nearest bricks and mortar accommodation is located at East Acton and North Kensington. 650 and 850 metres away.</p>		



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National/London policy	NPPF Green-belt policy applies (para 79): to prevent urban sprawl by keeping land permanently open and to enhance the beneficial use, such improving access; opportunities for outdoor sport and recreation etc. Construction of new buildings is inappropriate. The London Plan Policy 7.17 affords MOL the same protection as Green-belt, The Ministry of Defence retains rights of use of the land for military training purposes. The Wormwood Scrubs Act 1879 sets out provisions to ensure the open space is made available in perpetuity for all Londoners.
Local Policy	In accordance with Local Plan Policy EU1 the Scrubs will continue to be protected as publicly accessible open space serving a variety of functions. The site is Identified as a place in Policy P12. Any proposals for enhancements (e.g.: to improve accessibility) need to be agreed with the Wormwood Scrubs Charitable Trust and London Borough of Hammersmith And Fulham.
Planning History	N/A
Impact on local character / Townscape	The site has about 18 hectares of tree cover and 22 hectares of long grass meadow. Development would not accord with guidance on protecting the character of MOL and nature reserves.
Ecological and biodiversity impacts	The site has about 18 hectares of tree cover and 22 hectares of long grass meadow with almost 100 species of birds and 250 species of wildflowers (one sixth of the UK flora). Areas are specifically designated as Local Nature Reserves such as Braybrook Woods, Martin Bell's Wood and the Central Woodland Copse.
Trees	18 hectares of tree cover
Heritage	There are no identified heritage assets within the vicinity of the site.
Safety	As public open space and isolated in places personal safety could be a concern to users at night-time.
Flooding and drainage	The site is not located in National Flood Zone 2 or 3 but there are pockets of surface water flood risk (1 x in 200-years).
Access to local Services	There is a community centre located within the curtilage of Wormwood Scrubs in the south-west corner. Hammersmith Hospital and Queen Charlottes' and Chelsea Hospital are located to the south. Ark Burlington Danes Primary School and Kensington Aldridge Academy are located to the south. Old Oak Primary School is located to the southwest. There are employment opportunities in Park Royal to the west.
Utilities infrastructure	There is no access to utilities infrastructure as it is public open space.
Physical Constraints	N/A site is not appropriate for development.
Public Transport	Public transport access is poor, with the area's PTAL rating ranging from 0 to 1b. Nearest Underground station is to the southwest is East Acton, approximately 500m away.
Air quality / noise	N/A site is not appropriate for development.
Suitability Conclusion	The site is not suitable. It is protected as public open space as designated Metropolitan Open Land and a Metropolitan Park in the Mayor of London's Green Grid. Development would not accord with guidance on protecting and maintaining MOL.

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Availability	
Is the site available for Gypsy and Traveller use?	The site is not available for development as a Gypsy and Traveller site. It is protected in the London Plan and Local Plan as Metropolitan Open Land and benefits from its own Act of Parliament given it further protection.
Availability conclusion	The site is not available for development.
Achievability	
Identification of any abnormal costs or other constraints to development which would prevent or delay the site being delivered.	The site is not deliverable as a Gypsy and Traveller site. It is protected in the London Plan and Local Plan as Metropolitan Open Land.
When could the site be delivered?	The site is not deliverable
Achievability conclusion	The site is not achievable for development
<b>Overall conclusion</b>	<b>The site is not suitable, available or achievable. Wormwood Scrubs' roles are reflected in its designations and statutory protections.</b>