

# LOCAL PLAN SUB-COMMITTEE

## NOTICE AND AGENDA

For a meeting to be held on Thursday, 7 August 2025 at 7.00 pm

Members of the Local Plan Sub-Committee:-

Councillors:

Stephen Giles-Medhurst (Chair)  
Oliver Cooper  
Steve Drury  
Vicky Edwards  
Philip Hearn

Louise Price (Vice-Chair)  
Stephen King  
Chris Mitchell  
Sarah Nelmes

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*Joanne Wagstaffe, Chief Executive  
Wednesday, 30 July 2025*

The Council welcomes contributions from members of the public on agenda items at Local Plan Sub-Committee meetings. Details of the procedure are provided below:

Members of the public are entitled to register and identify which item(s) they wish to speak on from the published agenda for the meeting. Those who wish to register to speak are asked to register on the night of the meeting from 6.30pm. Please note that contributions will be limited to one person speaking for and one against each item for not more than three minutes.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part 1 business only of the meeting may be filmed, recorded, photographed, broadcast or reported via social media by any person.

Recording and reporting the Council's meetings is subject to the law and it is the responsibility of those doing the recording and reporting to ensure compliance. This will include the Human Rights Act, the Data Protection Act and the laws of libel and defamation.

### **1. Apologies for Absence**

To receive any apologies for absence.

### **2. Minutes**

(Pages 5 - 6)

To confirm, as a correct record, the Part 1 and Part II minutes of the Local Plan Sub-Committee meeting held on 10 June 2025.

**3. Notice of Urgent Business**

Items of other business notified under Council Procedure Rule 30 to be announced, together with the special circumstances that justify their consideration as a matter of urgency. The Chairman to rule on the admission of such items.

**4. Declarations of Interest**

To receive any declarations of interest.

**5. Gypsy and Traveller Accommodation Assessment and Gypsy, Traveller and Travelling Show People Topic Paper**

(Pages 7 - 156)

This report provides an overview of the most recent Gypsy and Traveller Accommodation Assessment (GTAA), dated July 2025, which has been prepared to assist with the formulation of the emerging Local Plan and introduces Members to the Gypsy, Traveller and Travelling Showpeople Topic Paper.

**Recommendation:**

That the Local Plan Sub-Committee:

- (i) notes the contents of this report;
- (ii) agrees to publish the Gypsy and Traveller Accommodation Assessment July 2025 (Appendix 2) to the emerging Local Plan Evidence Base (available on the Local Plan webpage); and
- (iii) recommends to the Policy and Resources Committee the update to the "Provision for Gypsies, Travellers and Travelling Showpeople" policy.

**6. Green Belt Topic Paper Report**

(Pages 157 - 176)

This report provides an overview of the draft Green Belt Topic Paper prepared to assist with the formulation of the Local Plan.

**Recommendation:**

That the Local Plan Sub-Committee notes the contents of this report and the associated Topic Paper.

**7. Other Business - If approved under item 3 above**

**8. Exclusion of Press and Public**

If the Sub-Committee wishes to consider the remaining items in private, it will be appropriate for a resolution to be passed in the following terms:-

"that under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following item(s) of business on the grounds that it involves the likely disclosure of exempt information as defined under Paragraphs 1 to 7 of Schedule 12A to the Act. It has been decided by the Council that in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the

information.”

9. **Part II minutes of the meeting held on 10 June 2025** (Pages 177 - 180)
10. **Member Briefing on Emerging Green Belt Evidence and Update on Non-Green Belt Sites** (Verbal Report)

A presentation will be provided at the meeting to aid Members' consideration.

**General Enquiries: Please contact the Committee Team at**  
[committeeteam@threerivers.gov.uk](mailto:committeeteam@threerivers.gov.uk)

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Three Rivers House  
Northway  
Rickmansworth  
Herts WD3 1RL

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## Local Plan Sub-Committee MINUTES

**Of a meeting held in the Penn Chamber, Three Rivers House, Rickmansworth, on Tuesday, 10 June 2025 from 7.00 - 9.46 pm**

**Present:** Councillors Stephen Giles-Medhurst, Louise Price, Oliver Cooper, Steve Drury, Vicky Edwards, Philip Hearn, Sarah Nemes, Narinder Sian and Stephen Cox

**Also in Attendance:**

Councillors Rue Grewal and Ciarán Reed

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**Officers in Attendance:**

Marko Kalik, Head of Planning Policy & Conservation  
Emma Lund, Senior Committee Officer  
Aaron Roberts, Senior Planning Officer

**LPSC1/25      Apologies for Absence**

Apologies for absence were received from Councillors King and Mitchell. Councillor Cox replaced Councillor King and Councillor Sian replaced Councillor Mitchell for this meeting only.

It was clarified that Councillor Drury had been appointed to the Sub-Committee at the Annual Council meeting, not Councillor Lloyd.

**LPSC2/25      Minutes**

The minutes of the Local Plan Sub-Committee meeting held on 12 May 2025 were confirmed as a correct record and signed by the Chair.

**LPSC3/25      Notice of Other Business**

There was none.

**LPSC4/25      Declarations of Interest**

There were no declarations of interest.

**LPSC5/25      Exclusion of Press and Public**

RESOLVED:

That under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined under Paragraph 3 of Schedule 12A to the Act. It

has been decided by the Sub-Committee that in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

#### **LPSC6/25      Local Plan: Regulation 18 Consultation Sites**

The Committee considered a report and received a presentation which set out the newly submitted sites to be included in the Regulation 18 Consultation, including site details and a summary of their performance in the SHELAA site assessments. Further information on the Sub-Committee's considerations is included in the separate Part II minute.

#### **RESOLVED:**

That the Local Plan Sub-Committee:

- i.     notes the contents of the report;
- ii.    notes the contents of the presentation;
- iii.   considers the sites as set out in the presentation against the criteria set out in the report and presentation;
- iv.    recommends to Policy & Resources Committee the sites to be included in the Regulation 18 consultation, subject to amendment as set out in the separate Part II minute and categorisation of the sites using a tiered ranking system;
- v.     agrees that public access to the report be denied until after Policy and Resources Committee (23 June 2025); and
- vi.    agrees that public access to the decision be denied until after Policy and Resources Committee (23 June 2025).

**CHAIR**

Three Rivers District Council

# Sub Committee Report

7 August 2025

## **LOCAL PLAN SUB COMMITTEE – 7 August 2025**

### **PART I**

#### **Gypsy and Traveller Accommodation Assessment and Gypsy, Traveller and Travelling Show People Topic Paper (DoF)**

#### **1 Summary**

- 1.1 This report provides an overview of the most recent Gypsy and Traveller Accommodation Assessment (GTAA), dated July 2025 which has been prepared to assist with the formulation of the emerging Local Plan and introduces Members to the Gypsy, Traveller and Travelling Showpeople Topic Paper.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to note the contents of this report, agree to publish Appendix 2 to the emerging Local Plan Evidence Base which can then also be used by Development Management during decision-making, and recommend to the Policy and Resources Committee the update to the “Provision for Gypsies, Travellers and Travelling Showpeople” policy.

#### **2 Background**

- 2.1 A Gypsy and Traveller Accommodation Assessment (GTAA) is an evidence study which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new gypsy and traveller pitches and travelling showpeople plots to cover the Council’s Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS).
- 2.2 In June 2024, the Council commissioned Opinion Research Services (ORS) to undertake a Gypsy and Traveller Accommodation Assessment to provide a robust assessment of current and future need for gypsy, traveller and travelling showpeople accommodation within the District. This GTAA dated December 2024 (Appendix 1) was published onto the Three Rivers website following agreement at a Local Plan Sub-Committee in March 2025.
- 2.3 However, during the final drafting of the GTAA in December 2024, the planning definition of a traveller (Annex 1 of the PPTS) expanded to include “all other persons with a cultural tradition of nomadism or living in a caravan”. As set out in a note in the GTAA, because of this amended definition, an updated version of the GTAA report has been prepared that reflects the changes in the PPTS and any planning permissions granted in the intervening period. The most recent GTAA is dated July 2025 (Appendix 2).
- 2.4 A more detailed breakdown of the findings from the July 2025 GTAA can be found within the Gypsy, Traveller and Travelling Showpeople Topic Paper (Appendix 3).
- 2.5 The draft “Provision for Gypsies, Travellers and Travelling Showpeople” policy is shown at Appendix 4.

#### **3 Key Findings from the Gypsy and Traveller Accommodation Assessment (July 2025)**



- 3.1 In terms of gypsies and travellers, the need of 37 pitches arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 4 pitches arising from households with undetermined need will be met through criteria-based policies.
- 3.2 In terms of travelling showpeople, the need of 6 plots arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.
- 3.3 As suggested by the GTAA, there are a range of different methods in order to meet identified need, and often a combination of methods is most effective. The approaches can be categorised as a criteria-based policy approach, extension of existing sites, allocating entirely new gypsy and traveller sites, or allocating parts of strategic general needs housing sites. Given the scale of need identified in Three Rivers recently, it is likely that a combination of approaches may be required.

#### **4 Call for Sites**

- 4.1 Despite previous call for sites consultations being open for all types of housing, these have not resulted in any sites being put forward for specifically gypsy and traveller pitches or travelling showpeople plots.
- 4.2 Given the significant identified need for both gypsy and travellers and travelling showpeople, and the relatively limited number of private sites within the District (which may have limited scope for expansion), it was deemed necessary to undertake a call for sites exercise for solely gypsy and travelling showpeople sites, to help identify any potential additional sites, in addition to the existing sites.
- 4.3 The gypsy, traveller and travelling showpeople call for sites period started on Friday 4 July and ends at 5pm on Monday 4 August 2025. At the time of writing this report the call for sites was still underway, however, Members will be verbally updated of any submissions at the Local Plan Sub-Committee on 7<sup>th</sup> August, which is after the call for sites exercise ends.
- 4.4 It is not expected that there will be much response to a call for sites, so any subsequent Regulation 18 consultation would involve minimal officer input or time delay.

#### **5 Draft Policy**

- 5.1 The draft “Provision for Gypsies, Travellers and Travelling Showpeople” policy was brought to the 17<sup>th</sup> October 2024 Local Plan Sub-Committee where it was agreed by Members. Since then and following the update to the GTAA in July 2025, the reasoned justification of the policy has been updated. The policy (including the reasoned justification) can be seen at Appendix 4.
- 5.2 Once a final strategy to meet the identified need has been finalised, the reasoned justification may need to be updated further.

#### **6 Policy/Budget Reference and Implications**

- 6.1 The recommendations in this report are within the Council’s agreed policy and budgets.

7      **Financial, Legal, Staffing, Equal Opportunities, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications**

7.1      None specific.

8      **Recommendation**

8.1      That the Local Plan Sub-Committee:

- Note the contents of this report
- Agrees to publish the Gypsy and Traveller Accommodation Assessment June 2025 (Appendix 2) to the emerging Local Plan Evidence Base (available on the Local Plan webpage).
- Recommend to the Policy and Resources Committee the update to the “Provision for Gypsies, Travellers and Travelling Showpeople” policy.

9      **Background Papers**

National Planning Policy Framework (2024)

Planning Practice Guidance (2024)

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

Planning Policy for Traveller Sites (December 2024)

10      **Appendices**

Appendix 1 - Three Rivers District Council Gypsy and Traveller Accommodation Assessment (December 2024)

Appendix 2 - Three Rivers District Council Gypsy and Traveller Accommodation Assessment (July 2025)

Appendix 3 – Gypsy, Traveller and Travelling Showpeople Topic Paper

Appendix 4 - Draft “Provision for Gypsies, Travellers and Travelling Showpeople” policy

Report prepared by: Aaron Roberts, Senior Planning Officer



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# Three Rivers District Council Gypsy and Traveller Accommodation Assessment (GTAA)

## Final Report

December 2024

**Note:**

The Planning Policy for Traveller Sites (PPTS) was updated in December 2024 and the planning definition of a Traveller in Annex 1 was amended. As a result of this an updated version of this GTAA Report will be prepared in due course that reflects the changes in the PPTS. The need figures that are included in this Report will not change.



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# 1. EXECUTIVE SUMMARY

## Introduction and Methodology

- <sup>1.1</sup> The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Three Rivers District Council (the Council) area.
- <sup>1.2</sup> As well as updating the previous GTAA, this GTAA provides a credible evidence base which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2024/25 to 2040/41 to cover the Council's Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of the previous GTAA for Three Rivers Council.
- <sup>1.3</sup> The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community living on all known sites, yards, and encampments.
- <sup>1.4</sup> A total of 37 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Three Rivers. A total of 20 interviews were completed with Travelling Showpeople. This represents a response rate of 93% for Gypsies and Travellers and 56% for Travelling Showpeople. Despite the efforts that were made it was not possible to identify any Travellers to interview living in bricks and mortar.
- <sup>1.5</sup> A total of 9 stakeholder interviews were also completed.
- <sup>1.6</sup> The fieldwork for the study was completed between July 2024 and September 2024, and the baseline date for the study is October 2024.

## Key Findings

### Pitch Needs – Gypsies and Travellers

- <sup>1.7</sup> Overall, the pitch needs for Gypsies and Travellers for the period 2024-2040 are set out below. Needs are set out for those households that met the 2023 PPTS planning definition of a Gypsy or Traveller<sup>1</sup>; for any undetermined households<sup>2</sup> where an interview was not able to be completed due to households not being present despite up to three visits to each site; and for those households that did not meet the 2023 PPTS planning definition – although this is not a requirement for a GTAA.
- <sup>1.8</sup> Only the need from those households who met the 2023 PPTS planning definition should be formally considered as need arising from the GTAA. This can be addressed through the intensification or expansion of existing sites, or the allocation of new sites or pitches.

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<sup>1</sup> The PPTS planning definition was updated in December 2023. See Chapter 2 for further details.

<sup>2</sup> See Chapter 3 for further information on undetermined households.

- <sup>1.9</sup> The Council will need to carefully consider how to address any need associated with undetermined Travellers, as it is unlikely that all the undetermined households will meet the 2023 PPTS planning definition of a Traveller. The GTAA recommends that the local proportion of those who met the planning definition (89%) should be applied to the undetermined need when considering Local Plan Policies. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in Paragraph 11 in the PPTS) for need from undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.
- <sup>1.10</sup> In general terms, the need for those households who did not meet the 2023 PPTS planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies. This approach is specifically referenced in the National Planning Policy Framework (2023).
- <sup>1.11</sup> Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.
- <sup>1.12</sup> Paragraph 63 then states that [emphasis added] *‘Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes’*. The footnote to this section states that *‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*
- <sup>1.13</sup> The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to support the preparation of any future Local Plan Policies.
- <sup>1.14</sup> There were 49 Gypsy or Traveller households identified in Three Rivers that met the 2023 PPTS planning definition and 6 households that did not meet the PPTS planning definition. There were 3 undetermined households that may meet the PPTS planning definition.
- <sup>1.15</sup> There is a need for **41 pitches households that met the planning definition**. This is made up of 3 pitches from households on an unauthorised development, 14 pitches from concealed/doubled-up/over-crowded households or single adults; 7 pitches from a 5-year need from teenage children; 3 pitches from roadside/in-migration; and 14 from new household formation using a rate of 1.70% derived from the household demographics.
- <sup>1.16</sup> There is a need for **5 pitches for undetermined households**. This is made up of a modelled need for 1 pitches from concealed/doubled-up/over-crowded households or single adults; a modelled need for 1 pitch from a 5-year need from teenage children; and 3 from new household formation, using the ORS national formation rate of 1.50%. If the locally derived proportion of households that met the planning definition (89%) were applied, this could result in a need for 4 pitches.
- <sup>1.17</sup> Whilst not now a requirement to include in a GTAA, there is a need for **3 pitches for households that did not meet the 2023 PPTS planning definition**. This is made up of 1 pitch for concealed/doubled-up/over-crowded households or single adults; and 2 from new household formation derived from the household demographics.

<sup>1.18</sup> Figure 1 summarises the identified need and Figure 2 breaks this down by 5-year periods.

**Figure 1 – Need for Gypsy and Traveller households in Three Rivers (2024-40)**

Status	2024-2040
Meet Planning Definition	41
Undetermined	5
Do not meet Planning Definition	3
<b>TOTAL</b>	<b>49</b>

**Figure 2 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2024 – 28	27
6 – 10	2029 – 33	5
11 – 15	2034 – 38	6
16 – 17	2039 – 40	3
<b>0 – 17</b>	<b>2024 – 40</b>	<b>41</b>

## Plot Needs – Travelling Showpeople

<sup>1.19</sup> Overall, the plot needs for Travelling Showpeople from 2024-2040 are set out below. Needs are set out for those households that met the 2023 PPTS planning definition of a Travelling Showperson; for those undetermined households where an interview was not able to be completed who may meet the planning definition; and for those households that did not meet the planning definition - although this is not a requirement for a GTAA.

<sup>1.20</sup> Only the need from those households who met the 2023 PPTS planning definition should be formally considered as need arising from the GTAA. This can be addressed through the intensification or expansion of existing yards, or the allocation of new yards or plots.

<sup>1.21</sup> The Council will need to carefully consider how to address any need associated with undetermined Travelling Showpeople, as it is unlikely that all the undetermined households will meet the 2023 PPTS planning definition of a Traveller. The GTAA recommends that the local proportion of households that met the planning definition (88%) should be applied to the undetermined need when considering Local Plan Policies. In terms of Local Plan Policies, the Council should consider the use of a criteria-based policy (as suggested in Paragraph 11 in the PPTS) for need from undetermined households, as well as to deal with any windfall applications, and need from bricks and mortar.

<sup>1.22</sup> Any need for households who did not meet the 2023 PPTS planning definition will need to be considered as part of general housing need.

<sup>1.23</sup> There is a need for **6 plots for households that met the planning definition**. This is made up of 4 plots from concealed/doubled-up/over-crowded households or single adults; 2 plots from a 5-year need from teenage children.

<sup>1.24</sup> There is a need for **10 plots for undetermined households**. This is made up of a modelled need for 3 plots from concealed/doubled-up/over-crowded households or single adults; a modelled need for 2 plots from a 5-year need from teenage children; and 5 plots from new household formation, using the ORS national

formation rate of 1.50%. If the locally derived proportion of households that met the planning definition (95%) were applied, this could result in a need for 10 plots.

- <sup>1.25</sup> Whilst not now a requirement to include in a GTAA, there is a need for **no plots for households that did not meet the planning definition.**

**Figure 3 – Need for Travelling Showpeople households in Three Rivers (2024-40)**

Status	2024-2040
Meet Planning Definition	6
Undetermined	10
Do not meet Planning Definition	0
<b>TOTAL</b>	<b>16</b>

**Figure 4 – Need for Travelling Showpeople households that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2024 – 28	6
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 17	2039 – 40	0
<b>0 – 17</b>	<b>2024 – 40</b>	<b>6</b>

## Transit Recommendations

- <sup>1.26</sup> Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is no need for a formal public transit site in Three Rivers at this time.
- <sup>1.27</sup> The situation relating to levels of unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- <sup>1.28</sup> It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>1.29</sup> In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- <sup>1.30</sup> The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See [www.negotiatedstopping.co.uk](http://www.negotiatedstopping.co.uk) for further information.

- <sup>1.31</sup> Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

## 2. INTRODUCTION

- <sup>2.1</sup> The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA), is to provide a robust assessment of current and future need for Gypsies, Travellers, and Travelling Showpeople accommodation in Three Rivers District Council.
- <sup>2.2</sup> The outcomes of the study will supersede any of the outcomes of the previous Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) completed in Three Rivers District Council
- <sup>2.3</sup> The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2023, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2023, and the Planning Practice Guidance (PPG) 2021.
- <sup>2.4</sup> The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It is a credible evidence base which can be used to aid the implementation of the Council's District Plan Policies and the provision of Traveller pitches and plots covering the period 2024/25 to 2040/41 to meet the 15-year requirements of the PPTS and the Councils Local Plan period.
- <sup>2.5</sup> We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- <sup>2.6</sup> The baseline date for the study is October 2024, which was when the household interviews were completed.

## Definitions

### The Planning Definition in PPTS (2023)

- <sup>2.7</sup> For the purposes of the planning system, the definition was changed in PPTS (2023). The planning definition is set out in Annex 1 and states that:

*For the purposes of this planning policy "gypsies and travellers" means:*

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*

*a) Whether they previously led a nomadic habit of life.*

*b) The reasons for ceasing their nomadic habit of life.*

*c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

*For the purposes of this planning policy, “travelling showpeople” means:*

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.*

***Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG)  
December 2023***

- <sup>2.8</sup> The key change that was made to both definitions in the December 2023 revision to PPTS was the reintroduction of those who have ceased to travel permanently. These households were excluded from the 2015 PPTS planning definition of a Traveller.

## Definition of Travelling

- <sup>2.9</sup> One of the most important questions that GTAA’s will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term ‘nomadic’.
- <sup>2.10</sup> **R v South Hams District Council (1994)** – defined Gypsies as “persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)” This includes ‘born’ Gypsies and Travellers as well as ‘elective’ Travellers such as New Age Travellers.
- <sup>2.11</sup> In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- <sup>2.12</sup> In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- <sup>2.13</sup> The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family’s recently approved Gypsy site sought judicial review of the Local Authority’s decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- <sup>2.14</sup> That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.

- <sup>2.15</sup> **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- <sup>2.16</sup> The implication of these rulings in terms of applying the planning definition is that it will only include those who travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who have never travelled for work, or those who have never travelled. It will not cover those who commute to work daily from a permanent place of residence (**see APP/E2205/C/15/3137477**).
- <sup>2.17</sup> It may also be that within a household some family members travel for nomadic purposes on a regular basis, but other family members stay at home to look after children in education, or other dependents with health problems etc. In these circumstances the household unit would be defined as travelling under the planning definition.
- <sup>2.18</sup> Households will also fall under the planning definition if they can demonstrate that they have ceased to travel temporarily or permanently as a result of their own or their family's or dependants' educational, health needs or old age. In order to have ceased to travel temporarily or permanently these households will need to demonstrate that they have travelled for work, or for seeking work, in the past.
- <sup>2.19</sup> This approach was endorsed by a Planning Inspector in Decision Notice for an appeal in East Hertfordshire (**Appeal Ref: APP/J1915/W/16/3145267**) that was issued in December 2016. A summary can be seen below.

*Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.*

- <sup>2.20</sup> This was further reinforced in a Decision Notice for an appeal in Norfolk that was issued in February 2018 (**Ref: APP/V2635/W/17/3180533**) that stated:

*As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander or travel for the purposes of making or seeking their livelihood.*



## Legislation and Guidance for Gypsies and Travellers

<sup>2.21</sup> Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » The Housing Act, 1985
- » Planning Policy for Traveller Sites (PPTS), 2023
- » The Housing and Planning Act, 2016
- » National Planning Policy Framework (NPPF), 2023
- » Planning Practice Guidance<sup>3</sup> (PPG), 2021

<sup>2.22</sup> In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

<sup>2.23</sup> The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2023). It should be read in conjunction with the National Planning Policy Framework (NPPF) 2023. In addition, the Housing and Planning Act (2016) makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

### Planning Policy for Traveller Sites (PPTS) 2023

<sup>2.24</sup> PPTS (2023), sets out the direction of Government policy. As well as introducing the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » Local planning authorities should make their own assessment of need for the purposes of planning.
- » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- » To encourage local planning authorities to plan for sites over a reasonable timescale.
- » That plan-making and decision-taking should protect Green Belt from inappropriate development.
- » To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.
- » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.
- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.

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<sup>3</sup> With particular reference to the sections on Housing needs of different groups (May 2021).

- » To reduce tensions between settled and Traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which Travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

<sup>2.25</sup> In practice, the document states that (PPTS Paragraph 9):

- » Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.

<sup>2.26</sup> PPTS goes on to state (Paragraph 10) that in producing their Local Plan, local planning authorities should:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty-to-Cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

<sup>2.27</sup> Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, PPTS also notes in Paragraph 11 that:

- » Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.

## National Planning Policy Framework (2023)<sup>4</sup>

<sup>2.28</sup> The most recent version of the National Planning Policy Framework was issued in December 2023. Paragraph 61 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.

<sup>2.29</sup> Paragraph 63 then states that [emphasis added] *'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable*

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<sup>4</sup> At the time of reporting the Government were consulting on changes to the NPPF. Other than now including a new footnote setting out that 5-year supply for Travellers should be assessed separately to overall 5-year supply, there are no other proposed changes to the NPPF in relation to Travellers.

housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

- <sup>2.30</sup> This essentially sets out that the needs of households that meet the planning definition should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.
- <sup>2.31</sup> In an Appeal Decision that was published in March 2020 for an appeal in Central Bedfordshire (**APP/P0240/C/18/3213822**) the Inspector concluded in relation to the then Paragraph 61 of the NPPF that:

*It seems to me that this wording makes clear that it is only those meeting that definition that should be included in an assessment of need for 'planning definition' travellers and that gypsies who have ceased travelling should be counted and provided for elsewhere and this is the approach proposed in the emerging Local Plan. This does not, of course mean that these gypsies should be allocated 'bricks and mortar' type housing. They will also need a suitable supply of caravan sites to meet their needs.*

## Levelling-up and Regeneration Act (2023)

- <sup>2.32</sup> Among other things, this Act seeks to make provision about town and country planning. The Act received Royal Assent in October 2023. Whilst there is currently no specific reference to changes to policy and guidance for Gypsies and Travellers, the Council may need to consider the outcomes of any changes to planning legislation that may impact on the accommodation needs of Gypsies and Travellers. In addition, the Act has also abolished the Duty to Cooperate that was introduced by the Localism Act in 2011 (although this is still a requirement under the NPPF), but it is understood that the Government is currently considering a replacement to this – currently referred to as the Alignment Test.

## Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]

- <sup>2.33</sup> In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022]* EWCA Civ 1391. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.
- <sup>2.34</sup> Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it has not been quashed or declared unlawful at this time.
- <sup>2.35</sup> As a result of the Lisa Smith Judgement to Government made changes to the PPTS in December 2023 to reintroduce those who have ceased to travel permanently under the definition.

### 3. METHODOLOGY

#### Background

- <sup>3.1</sup> Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of changes to PPTS 2023, the Housing and Planning Act (2016) the NPPF (2023), and the PPG (2021). It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- <sup>3.2</sup> PPTS contains a number of requirements for local authorities which must be addressed in any GTAA methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.
- <sup>3.3</sup> ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Brentwood, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Colchester, Cotswold, Daventry, East Hertfordshire, Gloucester, Maldon, Milton Keynes, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Tewkesbury, and Waverley.
- <sup>3.4</sup> An Appeal Decision for a Hearing in Central Bedfordshire (**APP/P0240/C/18/3213822**) that was issued in March 2020 concluded:

*'...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAA's produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.'*

- <sup>3.5</sup> The Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:

*'The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.'*

- <sup>3.6</sup> The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.

## Desk-Based Review

<sup>3.7</sup> ORS collated a range of secondary data that was used to support the study. This included:

- » Census data.
- » Traveller Caravan Count data.
- » Planning history for existing sites and yards.
- » Records of unauthorised sites/encampments.
- » Information on planning applications/appeals.
- » Information on enforcement actions.
- » Existing Needs Assessments and other relevant local studies.
- » Existing national and local policy, guidance, and best practice.

## Stakeholder Engagement

<sup>3.8</sup> Engagement was undertaken with key Council Officers from Three Rivers District Council through email and telephone interviews. A total of 3 interviews were completed with Council Officers from the study area.

## Working Collaboratively with Neighbouring Planning Authorities

<sup>3.9</sup> To provide background information for the study, email and telephone interviews were conducted with Planning Officers in neighbouring planning authorities. These interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Councils set out below.

- » Buckinghamshire Council
- » Dacorum Borough Council
- » Hertsmere Borough Council
- » London Borough of Harrow Council
- » London Borough of Hillingdon Council
- » St Albans City and District Council
- » Watford Borough Council

## Survey of Travelling Communities

<sup>3.10</sup> Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 attempts were made to contact households where it was not initially possible to conduct an interview because they were not available at the time.

- <sup>3.11</sup> Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need – and is an approach which is regularly challenged by the Planning Inspectorate and at Planning Appeals.
- <sup>3.12</sup> ORS worked closely with the Council to ensure that the interviews collected all the necessary information to support the study. The site interview questions that were used (see **Appendix F**) take account of changes to PPTS in 2023 and collect the information ORS feel is necessary to apply the current planning definition of a Traveller.
- <sup>3.13</sup> All interviews were completed by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.
- <sup>3.14</sup> Researchers also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- <sup>3.15</sup> Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch through a proxy interview from sources including neighbouring residents and site management (if present).

## Engagement with Bricks and Mortar Households

- <sup>3.16</sup> The 2021 Census recorded 33 households who identified as either Gypsies or Irish Travellers, or Roma who lived in a house or bungalow in Three Rivers and 23 living in a flat or maisonette.
- <sup>3.17</sup> ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; intelligence from the stakeholder interviews; information from housing registers; and other local knowledge from stakeholders. Through this approach the GTAA endeavoured to do everything to give households living in bricks and mortar the opportunity to make their views known.
- <sup>3.18</sup> As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard.

## Timing of the Fieldwork

- <sup>3.19</sup> ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS would normally aim to complete fieldwork during the non-travelling season, and also to avoid days of known local or national events. The fieldwork was completed between July 2024 and September 2024 and Researchers were able to collect information on the majority of residents living on sites and yards in Three Rivers.

## Applying the PPTS Planning Definition

- <sup>3.20</sup> The primary change to PPTS in December 2023 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. There are a number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily or permanently due to education, ill health or old age.
- <sup>3.21</sup> The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:
- » Whether any household members have travelled in the past 12 months.
  - » Whether household members have ever travelled.
  - » The reasons for travelling.
  - » Where household members travelled to and for how long.
  - » The times of the year that household members travelled.
  - » Where household members stay when they are away travelling.
  - » When household members stopped travelling.
  - » The reasons why household members stopped travelling.
  - » Whether household members intend to travel again in the future.
  - » When and the reasons why household members plan to travel again in the future.
- <sup>3.22</sup> When the household interviews were completed, the answers from the questions on travelling were used to determine the status of each household against the planning definition in PPTS. Through a combination of responses, households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily or permanently due to education, ill health or old age, and plan to travel again for work purposes in the future. A similar definition applies to Travelling Showpeople as to Gypsies and Travellers. This included information on the type of work that is undertaken; which family members travelled for work; the times of the year that family members travelled for work; the duration of the trips for work; and where the family members stay when travelling away from home for work.
- <sup>3.23</sup> Households that need to be formally considered in the GTAA fall under one of three classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:
- » Households that travel under the planning definition.
  - » Households that have ceased to travel temporarily or permanently under the planning definition.
  - » Households where an interview was not possible who may fall under the planning definition.
- <sup>3.24</sup> Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Council with components of need to consider as part of their work on wider housing needs assessments. This is consistent with the requirements of the NPPF (2023).



## Undetermined Households

- <sup>3.25</sup> As well as calculating need for households that meet the planning definition, a GTAA has to consider the needs of any households where an interview was not able to be completed (either due to refusal to be interviewed or households that were not present during the fieldwork period). Whilst there is no law or guidance that sets out how the needs of these households should be addressed; an approach would have been taken that sought an estimate of potential need from these households. This would be an additional need figure over and above the need identified for households that meet the planning definition.
- <sup>3.26</sup> The estimate would seek to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. As the demographics of any undetermined households are unknown, the ORS national household formation rate of 1.50% has been used. In addition, need from concealed/doubled-up households and from teenagers has been modelled based on the outcomes from completed interviews.
- <sup>3.27</sup> ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.
- <sup>3.28</sup> However, data that has been collected from over 5,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall, approximately 30% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 500 interviews that have been completed) – and in some local authorities, no households meet the planning definition.
- <sup>3.29</sup> ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on approximately 40% of them at a representative range of sites. Approximately 30% meet the planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.
- <sup>3.30</sup> This suggests that only a proportion of any need identified from undetermined households would need to be considered alongside need from households that met the planning definition, and that the remaining need from undetermined households will have to be addressed through separate Local Plan Criteria-Based Policies, alongside need from households that did not meet the planning definition.
- <sup>3.31</sup> The ORS methodology to address the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex. In his Report that was published on 29th June 2017 he concluded:

*The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.*



## Households that Do Not Meet the Planning Definition

<sup>3.32</sup> Households who do not travel for work, or have never travelled, now fall outside of the 2023 PPTS planning definition of a Traveller. However Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010) as a result of their protected characteristics. In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance<sup>5</sup> related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be assessed as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the NPPF (2023).

<sup>3.33</sup> Paragraph 63 of the NPPF states that [emphasis added]:

*‘Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes’. The footnote to this section states that ‘Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.’*

## Calculating the Current and Future Need

<sup>3.34</sup> To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

### Supply of Pitches

<sup>3.35</sup> The first stage of the assessment sought to determine the number of occupied, vacant, and potentially available supply in the study area:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within 5 years.
- » Pitches vacated by people moving to housing.

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<sup>5</sup> Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats. DCLG (March 2016).

- » Pitches vacated by people moving from the study area (out-migration).

<sup>3.36</sup> It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

## Current Need

<sup>3.37</sup> The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:

- » Households on unauthorised developments for which planning permission is not expected.
- » Concealed, doubled-up or over-crowded households (including single adults).
- » Teenage children in need of a pitch of their own in the next 5 years.
- » In-migration/roadside.
- » Households in bricks and mortar needing to move to sites.
- » Households in need on waiting lists for public sites.

## Future Need

<sup>3.38</sup> The final stage was to identify components of future need. This includes the following components:

- » Households living on sites with temporary planning permission.
- » New household formation.

<sup>3.39</sup> Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.

<sup>3.40</sup> ORS are also increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.

<sup>3.41</sup> All of these components of supply and need are presented in tabular format which identify the overall net need for current and future accommodation for Gypsies, Travellers and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs for Gypsies and Travellers and Travelling Showpeople are identified separately, and the needs are to 2040.

## Pitch Turnover

<sup>3.42</sup> Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches on sites are not available to meet any local need. The use of pitch turnover has been the subject of a number of

Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using pitch turnover and concluded:

*West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.*

- <sup>3.43</sup> In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers<sup>6</sup> produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

*Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.*

- <sup>3.44</sup> As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available through the household interviews, annual pitch turnover has not been considered as a formal component of supply in this GTAA. However, natural turnover of pitches on public and private sites should continue to be monitored by the Council. In particular, the natural turnover of pitches can help to meet future need over time from new household formation.

## Transit Provision

- <sup>3.45</sup> GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites can be developed to accommodate Gypsies and Travellers as they move through different areas.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

- <sup>3.46</sup> Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a

<sup>6</sup> See [www.londongypsiesandtravellers.org.uk/resources/](http://www.londongypsiesandtravellers.org.uk/resources/) for details.

restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.

- 3.47 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but has much more limited facilities with typically only a source of water and chemical toilets provided.
- 3.48 Another alternative is 'negotiated stopping'. The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- 3.49 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- 3.50 The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where *a suitable pitch for the caravan or each of the caravans on a relevant caravan site which is situated in the local authority's area* [or within the county in two-tier local authority areas]. Relevant sites need to be managed by a Local Authority or a Registered Social Landlord (RSL). The police have no powers to direct people to private transit sites or pitches.
- 3.51 Consideration will also have to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.
- 3.52 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry of Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

## 4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES AND POPULATION

### Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size<sup>7</sup>. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.3 The alternative to a public residential site is a private residential site and yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites due to its mobile nature, as described more fully in Chapter 3 above. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

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<sup>7</sup> Whilst it has now been withdrawn, *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

## Sites and Yards

4.6 In the area on the base date for the GTAA, there were

- » No public sites;
- » 5 private sites with permanent planning permission (46 pitches);
- » No private sites with temporary planning permission;
- » No sites that are tolerated for planning purposes;
- » 1 unauthorised site (3 pitches);
- » 5 Travelling Showmen's yard (37 plots).
- » There were no public transit sites identified.

4.7 See **Appendix E: Site and Yard List** for further details.

**Figure 5 - Total amount of provision in Three Rivers (October 2024)**

Category	Sites/Yards	Pitches/Plots
Public sites	0	0
Private with permanent planning permission	5	46
Private with temporary planning permission	0	0
Tolerated pitches	0	0
Unauthorised sites	1	3
Public transit sites	5	37
Travelling Showpeople yards	0	0
<b>TOTAL</b>	<b>11</b>	<b>86</b>

## MHCLG Traveller Caravan Count

4.8 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, the Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans.

4.9 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.

4.10 The most recent Traveller Caravan Count in July 2024 recorded 64 Gypsy and Traveller caravans on sites with permanent permissions.

## 5. STAKEHOLDER ENGAGEMENT

### Introduction

- 5.1 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual.
- 5.2 The aim of these interviews was to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 5.3 A total of 3 interviews were undertaken with Council Officers from the study area.
- 5.4 In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 7 neighbouring local authorities:
- » Buckinghamshire Council
  - » Dacorum Borough Council
  - » Hertsmere Borough Council
  - » London Borough of Harrow Council
  - » London Borough of Hillingdon Council
  - » St Albans City and District Council
  - » Watford Borough Council
- 5.5 Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

### Views of Key Stakeholders and Council Officers in Three Rivers

#### Accommodation Needs

- 5.6 Since the last GTAA, the Council have sought to address the low interview response rate achieved during the previous assessment.
- 5.7 The Council are aware of anecdotal evidence which suggests there is a need for extra pitches.

#### Short-term Encampments and Transit Provision

- 5.8 Only a small number of encampments occur in the area on an annual basis. Occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area.
- 5.9 If necessary, the Council will issue enforcement notices to encampments.

## Cross Border Issues

- <sup>5.10</sup> No cross-border issues with neighbouring authorities were identified.
- <sup>5.11</sup> The Council are in communication with Hertfordshire County Council on a regular basis regarding any issues relating to Travellers. Additionally, the Council also line of communication with neighbouring authorities should any issues that need addressing occur.

## Future Priorities and Any Further Issues

- <sup>5.12</sup> A future priority for the Council is to find suitable locations to address any unmet need.

## Neighbouring Authorities

- <sup>5.13</sup> Potential cross-border issues were raised by the following authorities:
- » Buckinghamshire Council
  - » London Borough of Hillingdon Council
  - » Watford Borough Council
- <sup>5.14</sup> Three Rivers District Council were made aware of all issues raised by each Council
- <sup>5.15</sup> The following authorities responded to indicate no potential cross-border issues:
- » Dacorum Borough Council
  - » Hertsmere Borough Council
  - » London Borough of Harrow Council
  - » St Albans City and District Council



## 6. SURVEY OF TRAVELLING COMMUNITIES

### Interviews with Gypsies and Travellers

- <sup>6.1</sup> One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area, and also efforts to engage with the bricks and mortar community.
- <sup>6.2</sup> In Three Rivers, at the base date for the GTAA, there were 5 privately owned sites with permanent planning permission; 1 unauthorised site; 2 authorised Travelling Showmen's yards; and 3 Travelling Showmen's yards that are tolerated for planning purposes. See **Appendix E: Site and Yard List** for further details.
- <sup>6.3</sup> The tables below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

**Figure 6 – Interviews completed in Three Rivers**

Site Status	Pitches/ Plots	Interviews	Reasons for not completing interviews/additional interviews
Public Sites			
None	-	-	-
Private Sites			
Land adjacent 321B Uxbridge Road	1	0	1 x site undeveloped
The Oaklands	24	24	
Fir Trees	2	1	1 x storage
Little Lily	9	1	3 x no contact, 5 x undeveloped
Little Liz	10	8	2 x non-Travellers
Temporary Sites			
None	-	-	-
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
Keepers Cottage	3	3	
TSP – Authorised			
Rear of 317-319 Uxbridge Road	16	15	1 x vacant
Rear of 321 Uxbridge Road	2	2	
TSP -Tolerated			
Brickfield Farm	15	0	15 x refusals
Meander	2	2	
Wood Yard	2	1	1 x no contact
<b>TOTAL</b>	<b>86</b>	<b>57</b>	

## 7. CURRENT AND FUTURE PITCH PROVISION

### Introduction

- <sup>7.1</sup> This section focuses on the pitch provision which is needed in the study area currently and to 2040. This includes both current unmet need and need which is likely to arise in the future<sup>8</sup>. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- <sup>7.2</sup> We would note that this section is based upon a combination of the on-site surveys, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.
- <sup>7.3</sup> This section concentrates not only upon the total provision, which is required in the area, but also whether there is a need for any transit sites and/or emergency stopping place provision.

### New Household Formation Rates

- <sup>7.4</sup> Nationally, a household formation and growth rate of 3.00% net per annum<sup>9</sup> has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for pitches unrealistically. In this context, ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in June 2020. The main conclusions are set out here and the full paper is in **Appendix G: Technical Note on Household Formation and Growth Rates**.
- <sup>7.5</sup> Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.
- <sup>7.6</sup> The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- <sup>7.7</sup> The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers (in addition research by ORS has identified a national growth rate of 1.00% for Travelling Showpeople) and this has also been adjusted locally based on site demographics.

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<sup>8</sup> See Paragraphs 3.41 and 3.42 for details of components on current and future need.

<sup>9</sup> Page 25, *Gypsy and Traveller Accommodation Needs Assessments – Guidance* (DCLG – 2007) Now withdrawn.

- <sup>7.8</sup> This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

*In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.*

- <sup>7.9</sup> Another case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

*There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.*

- <sup>7.10</sup> ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- <sup>7.11</sup> Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence is usually used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18 (by planning status).
- <sup>7.12</sup> However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAA's that ORS have completed across England and Wales.

<sup>7.13</sup> In Three Rivers the following approaches have been applied:

- » For Gypsies and Travellers who met the planning definition 41% of residents were aged under 18 so the ORS national formation rate of 1.50% has been uplifted to 1.70%.
- » For Gypsies and Travellers who did not meet the planning definition there were very low numbers of children aged under 18 so household demographics have been used to determine formation.
- » For Travelling Showpeople who met the planning definition there were no children aged under 18 other than 2 teenagers who have been identified as components of need so there is no further household formation.
- » For Travelling Showpeople who did not meet the planning definition there were no children so there is no further household formation.

<sup>7.14</sup> In addition, the ORS national rate of 1.50% has been used to estimate growth for undetermined Travellers, based on the best available evidence due to lack of local demographic evidence for undetermined Traveller households.

<sup>7.15</sup> New household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

## Breakdown by 5 Year Bands

<sup>7.16</sup> In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. In addition, the total net new household formation is split across the GTAA period based on the compound rate of growth that was applied rather than being split equally over time.

## Applying the 2023 PPTS Planning Definition

<sup>7.17</sup> The outcomes from the household interviews were used to determine the status of each household against the planning definition in PPTS 2023. This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition or those who demonstrated that they have ceased to travel temporarily or permanently (due to education, ill health, or old age) form the components of need in the GTAA that will need to be addressed through a Gypsy and Traveller Local Plan Policy.

<sup>7.18</sup> In addition, households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from Undetermined Households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning definition has also been assessed to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.

<sup>7.19</sup> The table below sets out the planning status of households that were interviewed for the Three Rivers GTAA. This includes any hidden households that were identified during the household interviews including concealed and doubled-up households or single adults and accepted in-migration.

**Figure 7 – Planning status of households in Three Rivers**

Status	Meet Planning Definition	Do Not Meet Planning Definition	Undetermined
<b>Gypsies and Travellers</b>			
Public Sites	0	0	0
Private Sites	43	6	3
Temporary Sites	0	0	0
Tolerated Sites	0	0	0
Unauthorised Sites	3	0	0
B&M	0	0	0
In-migration/Roadside	3	0	0
<b>Sub-Total</b>	<b>49</b>	<b>6</b>	<b>3</b>
<b>Travelling Showpeople</b>			
TSP – Private	19	1	0
TSP – Tolerated	2	2	16
<b>Sub-Total</b>	<b>21</b>	<b>3</b>	<b>16</b>
<b>TOTAL</b>	<b>70</b>	<b>9</b>	<b>19</b>

<sup>7.20</sup> Figure 7 shows that for Gypsies and Travellers in Three Rivers, 49 households met the planning definition of a Traveller, and 21 Travelling Showpeople households met the definition in that they were able to demonstrate that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence or have ceased to travel temporarily or permanently.

<sup>7.21</sup> A total of 6 Gypsy and Traveller households, and 3 Travelling Showpeople households did not meet the planning definition as they were not able to demonstrate that they travel have travelled for work in the past or have never travelled.

<sup>7.22</sup> It was not possible to make contact with 3 Gypsy and Traveller households and 16 Travelling Showpeople households during the fieldwork period as households either refused to take part in an interview or were not present during the fieldwork period. These households are recorded as Undetermined for the purposes of the GTAA.

## Interviews with Gypsies and Travellers in Bricks and Mortar

<sup>7.23</sup> Despite all of the efforts that were made it was not possible to identify any households living in bricks and mortar to interview.

## Migration/Roadside

- <sup>7.24</sup> The study also sought to identify any need from households who have been forced to move from sites due to overcrowding and who are currently living on the roadside or on sites in other local authorities – and who have strong family links with households in Three Rivers. These are referred to as roadside households or displaced in-migration.
- <sup>7.25</sup> Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified 3 households living on roadside predominantly in Three Rivers with a need to move to a permanent pitch area.
- <sup>7.26</sup> ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to Three Rivers. Therefore, apart from the 3 households set out above, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- <sup>7.27</sup> It is important to note that any applications for new sites or additional pitches as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

## Waiting Lists for Public Sites

- <sup>7.28</sup> There is no public site in Three Rivers.

## Gypsy and Traveller Needs

### Pitch Needs – Gypsies and Travellers that met the Planning Definition

<sup>7.29</sup> Analysis of the household interviews indicated that there is a need from 3 pitches from households on an unauthorised development, 14 pitches from concealed/doubled-up/over-crowded households or single adults; 7 pitches from a 5-year need from teenage children; 3 pitches from in-migration and 14 from new household formation, using a rate of 1.70% derived from the household demographics. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller in Three Rivers is for 41 pitches over the GTAA period.

**Figure 8 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition**

Gypsy & Traveller – Meeting Planning Definition	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	3
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	14
5 year need from teenage children	7
Movement from bricks and mortar	0
In-Migration/Roadside	3
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>27</b>
<b>Future Need</b>	
Households on pitches with temporary planning permission	0
New household formation	14
<i>(Household base 56 and formation rate 1.70%)</i>	
<b>Total Future Need</b>	<b>14</b>
<b>Net Pitch Need = (Current and Future Need – Total Supply)</b>	<b>41</b>

**Figure 9 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2024 – 28	27
6 – 10	2029 – 33	5
11 – 15	2034 – 38	6
16 – 17	2039 – 40	3
<b>0 – 17</b>	<b>2024 – 40</b>	<b>41</b>

## Pitch Needs – Undetermined Gypsies and Travellers

<sup>7.30</sup> The assessment identified a need for up to 5 pitches for undetermined households. This is made of a modelled need for 1 pitch from concealed/doubled-up/over-crowded households or single adults; a modelled need for 1 pitch from a 5-year need from teenage children; and 3 from new household formation, using the ORS national formation rate of 1.50%. If the locally derived proportion of households that met the planning definition (89%) were applied, this could result in a need for 4 pitches.

<sup>7.31</sup> See **Appendix C**: Undetermined households for further details.

## Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition

<sup>7.32</sup> It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the 2023 PPTS planning definition. However, this assessment is included for illustrative purposes, to help fulfil the requirements of the Housing Act (1985)<sup>10</sup> and the NPPF (2023) and to provide the Council with information on levels of need that will have to be addressed through separate Local Plan Policies.

<sup>7.33</sup> On this basis, it is evident that whilst any needs from the households who did not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Irish and Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing.

<sup>7.34</sup> The assessment identified a need for 3 pitches for households that did not meet the 2023 PPTS planning definition. This is made up of 1 pitch concealed/doubled-up/over-crowded households or single adults; and 2 from new household formation, derived from the household demographics

<sup>7.35</sup> See **Appendix D**: Households that did not meet the Planning Definition for further details.

<sup>10</sup> See Paragraph 3.34 for details.



## Travelling Showpeople Needs

### Plot Needs – Travelling Showpeople that meet the Planning Definition

<sup>7.36</sup> Analysis of the household interviews indicated that there is a need from 4 plots from concealed/doubled-up/over-crowded households or single adults; 2 plots from a 5-year need from teenage children. Therefore, the overall level of need for those households who met the planning definition of a Travelling Showperson in Three Rivers is for 6 plots over the GTAA period.

**Figure 10 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition**

Travelling Showpeople – Meeting Planning Definition	Plots
<b>Supply of Plots</b>	
Available supply from vacant public and private plots	0
Available supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	2
Movement from bricks and mortar	0
In-Migration/Roadside	0
<b>Total Current Need</b>	<b>6</b>
<b>Future Need</b>	
Households on plots with temporary planning permission	0
New household formation	0
<i>(No Household Formation)</i>	
<b>Total Future Need</b>	<b>0</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>6</b>

**Figure 11 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2024 – 28	6
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 17	2039 – 40	0
<b>0 – 17</b>	<b>2024 – 40</b>	<b>6</b>

## Plot Needs – Undetermined Travelling Showpeople

<sup>7.37</sup> The assessment identified a need for up to 10 plots for undetermined households. This is made of a modelled need for 3 plots from concealed/doubled-up/over-crowded households or single adults; a modelled need for 2 plots from a 5-year need from teenage children; and 5 from new household formation, using the ORS national formation rate of 1.50%. If the locally derived proportion of households that met the planning definition (88%) were applied, this could result in a need for 9 plots.

<sup>7.38</sup> See **Appendix C**: Undetermined households for further details.

## Plot Needs – Travelling Showpeople that do not meet the Planning Definition

<sup>7.39</sup> There was no current or future need identified from 3 Travelling Showpeople households that did not meet the planning definition.

<sup>7.40</sup> See **Appendix D**: Households that did not meet the Planning Definition for further details.

## Transit Requirements

<sup>7.41</sup> When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the stakeholder interviews; and records on numbers of unauthorised encampments.

## MHCLG Traveller Caravan Count

<sup>7.42</sup> Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.

<sup>7.43</sup> Data from the Traveller Caravan Count shows that there have been 64 Gypsy and Traveller caravans on sites with permanent permissions.

## Stakeholder Interviews and Local Data

<sup>7.44</sup> The outcomes of the Stakeholder Interviews were that only a small number of encampments occur in the area on an annual basis, and that these occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area. If necessary, the Council will issue enforcement notices to encampments.

## Transit Recommendations

- <sup>7.45</sup> Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- <sup>7.46</sup> The situation relating to levels of unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information could be collected as part of a Welfare Assessment (or similar).
- <sup>7.47</sup> It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>7.48</sup> In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- <sup>7.49</sup> The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See [www.negotiatedstopping.co.uk](http://www.negotiatedstopping.co.uk) for further information.
- <sup>7.50</sup> Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

## 8. CONCLUSIONS

- 8.1 This study provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites 2023, the Housing and Planning Act 2016, the National Planning Policy Framework 2023, and Planning Practice Guidance 2021. It also provides the evidence base which can be used to support Local Plan Policies.

### Gypsies and Travellers

- 8.2 In summary, in Three Rivers, for the GTAA period 2024 to 2040, there is a need for:
- » 41 pitches for Gypsy and Traveller households that met the 2023 PPTS planning definition.
  - » Up to 6 pitches for undetermined Gypsy and Traveller households that may meet the planning definition.
  - » 3 pitches for Gypsy and Traveller households who did not meet the planning definition.
- 8.3 Under the requirements of Paragraph 10 of the PPTS the Council have to identify and update annually a supply of deliverable sites suitable to provide 5 years' worth of sites against their locally set targets; and to identify a supply of specific, deliverable sites, or broad locations for growth for years 6-10, and where possible for years 11-15 and onwards.
- 8.4 In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.
- 8.5 Need from households who met the 2023 PPTS planning definition should be addressed through the intensification, reconfiguration or expansion of existing sites, or the allocation of new sites or pitches. The Council should also consider the regularisation of sites that are unauthorised. In order to explore opportunities for need, or a proportion of need, to be met on existing sites the Council should consider completing a more detailed Pitch Deliverability Assessment (PDA). This approach has been successfully used by other Local Authorities in England which have concluded that a large proportion of need could, in principle, be met on existing sites.
- 8.6 The Council will also need to carefully consider how to address any needs from households seeking to move to Three Rivers (in-migration), or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Council should continue to use adopted Local Plan Policies (when in place) which are a criteria-based policy (as suggested in PPTS) for any undetermined households, as well as to deal with any windfall applications, need from in-migration, and need from bricks and mortar.
- 8.7 Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households that do not fall within the PPTS planning definition should be met as a part of general housing need, through separate Local Plan Policies.
- 8.8 Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against pitches not found to be occupied by Gypsies or Travellers.

- <sup>8.9</sup> Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to enable an accurate review of Local Plan allocations to be made.

## Travelling Showpeople

- <sup>8.10</sup> In summary, in Three Rivers, for the GTAA period 2024 to 2040, there is a need for:
- » 6 plots for Travelling Showpeople households that met the 2023 PPTS planning definition.
  - » Up to 10 plots for undetermined Travelling Showpeople households that may meet the planning definition.
  - » No plots for Travelling Showpeople households who did not meet the planning definition.
- <sup>8.11</sup> It is recommended that the current need could be addressed through the intensification or expansion of existing yards in Three Rivers.

## Transit Provision

- <sup>8.12</sup> Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- <sup>8.13</sup> It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>8.14</sup> In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

## Summary of Need to be Addressed – Gypsies and Travellers

- <sup>8.15</sup> Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the tables below set out the likely number of pitches that will need to be addressed through a Gypsy and Traveller Local Plan Policy, or through separate Local Plan Housing Policies.
- <sup>8.16</sup> Total need from Gypsy and Traveller households that meet the planning definition is for 41 pitches; total need from undetermined households is for 5 pitches; and total need from households that do not meet the planning definition is for 3 pitches between 2024 and 2040.
- <sup>8.17</sup> The table below breaks total need down by the following for the year bands that are including in the GTAA. Given that the local proportion of households in Three Rivers that met the 2023 PPTS planning definition (89%) is considerably higher than the ORS national proportion (30%) it is recommended that the Council consider this figure when seeking to address local need:
- » The need from households that met the planning definition;

- » The likely proportion of need from undetermined households that will meet the planning definition. It does this by taking 89% (the locally derived proportion that meet the planning definition);
- » The need from households that did not meet the planning definition; and
- » The likely proportion of need from undetermined households that will not meet the planning definition. It does this by taking 11% (the locally derived proportion that did not meet the planning definition);

<sup>8.18</sup> 5-year need and future need from households that meet the planning definition (both known and undetermined) will need to be addressed through a Gypsy and Traveller Local Plan Policy through a combination of site allocations and through a Criteria-Based Policy as required by the PPTS.

<sup>8.19</sup> 5-year need and future need for households that did not meet the planning definition will need to be met through other Local Plan Housing Policies as required by Paragraph 63 of the NPPF.

**Figure 12 – Need for Gypsy and Traveller pitches broken down by Local Plan Policy Type – Local 89%**

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	24-28	29-33	34-38	39-40	24-28	29-33	34-38	39-40	24-40
Meet Planning Definition	27	5	6	3	0	0	0	0	41
89% Undetermined	2	1	1	0	0	0	0	0	4
Do Not Meet Planning Definition	0	0	0	0	1	0	1	1	3
11% Undetermined	0	0	0	0	1	0	0	0	1
	29	6	7	3	2	0	1	1	49

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## Appendix B: Glossary of Terms / Acronyms Used

### Glossary

**Amenity block** meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

**Bricks and mortar** is used to describe mainstream housing.

**Caravan** is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

**Concealed household** is used to describe households living within other households, who are unable to set up separate family units.

**Doubling-Up** refers to there being more than the permitted number of caravans on a pitch or plot.

**Emergency Stopping Place** is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

**Green Belt** refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; and to preserve the setting and special character of historic towns.

**Household Formation** is the process in which individuals form separate households. This is normally though adult children setting up their own household.

**In-migration** refers to movement of households into a region or community.

**Local Plans** are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

**Out-migration** refers to the Movement from one region or community in order to settle in another.

**Pitch/plot** is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

**Private site** is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

**Site** refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

**Social/Public/Council Site** is an authorised site owned by either the local authority or a Registered Housing Provider.

**Temporary planning permission** refers to a private site with planning permission for a fixed period of time.

**Tolerated site/yard** refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

**Transit provision** refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

**Unauthorised Development** refers to caravans on land owned by Gypsies and Travellers and without planning permission.

**Unauthorised Encampment** refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

**Waiting list** is a record held by the local authority or site managers of applications to live on a site.

**Yard** is a name often used by Travelling Showpeople to refer to a site.



## Acronyms and Initials

<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>LPA</b>	Local Planning Authority
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>ORS</b>	Opinion Research Services
<b>PPG</b>	Planning Practice Guidance
<b>PPTS</b>	Planning Policy for Traveller Sites
<b>TSP</b>	Travelling Showpeople

## Appendix C: Undetermined households

Figure 13 – Need for undetermined Gypsy and Traveller households in Three Rivers

Gypsy & Traveller – Undetermined	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding (modelled)	1
5 year need from teenage children (modelled)	1
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>2</b>
<b>Future Need</b>	
Households on pitches with temporary planning permission	0
New household formation	3
<i>(Household base 5 and formation rate 1.50%)</i>	
<b>Total Future Need</b>	<b>3</b>
<b>Net Pitch Need = (Current and Future Need – Total Supply)</b>	<b>5</b>

Figure 14 – Need for undetermined Gypsy and Traveller households in Three Rivers by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	2
6 – 10	2029 – 33	1
11 – 15	2034 – 38	1
16 – 17	2039 – 40	1
<b>0 – 17</b>	<b>2024 – 40</b>	<b>6</b>

Figure 15 – Need for undetermined Travelling Showpeople households in Three Rivers

Travelling Showpeople – Undetermined	Plots
<b>Supply of Pitches</b>	
Available supply from vacant public and private plots	0
Available supply from plots on new sites	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding (modelled)	3
Movement from bricks and mortar (modelled)	2
5 year need from teenage children	0
In-Migration/Roadside	0
<b>Total Current Need</b>	<b>5</b>
<b>Future Need</b>	
Households on plots with temporary planning permission	0
New household formation	5
<i>(Household base 21 and formation rate 1.50%)</i>	
<b>Total Future Need</b>	<b>5</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>10</b>

Figure 16 – Need for undetermined Travelling Showpeople households in Three Rivers by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	5
6 – 10	2029 – 33	2
11 – 15	2034 – 38	2
16 – 17	2039 – 40	1
<b>0 – 17</b>	<b>2024 – 40</b>	<b>10</b>

## Appendix D: Households that did not meet the Planning Definition

Figure 17 – Need for Gypsy and Traveller households in Three Rivers that did not meet the Planning Definition

Gypsy & Traveller – Not Meeting Planning Definition	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	1
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>1</b>
<b>Future Need</b>	
Households on pitches with temporary planning permission	0
New household formation	2
<i>(Formation from demographics)</i>	
<b>Total Future Need</b>	<b>2</b>
<b>Net Pitch Need = (Current and Future Need – Total Supply)</b>	<b>3</b>

Figure 18 – Need for Gypsy and Traveller households in Three Rivers that did not meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2024 – 28	1
6 – 10	2029 – 33	0
11 – 15	2034 – 38	1
16 – 17	2039 – 40	1
<b>0 – 17</b>	<b>2024 – 40</b>	<b>3</b>

**Figure 19 – Need for Travelling Showpeople households in Three Rivers that did not meet the Planning Definition**

<b>Travelling Showpeople – Not Meeting Planning Definition</b>	<b>Plots</b>
<b>Supply of Pitches</b>	
Available supply from vacant public and private plots	0
Available supply from plots on new sites	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-Up/Over-Crowding	0
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
<b>Total Current Need</b>	<b>0</b>
<b>Future Need</b>	
Households on pitches with temporary planning permission	0
New household formation	0
<i>(No household formation)</i>	
<b>Total Future Need</b>	<b>0</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>0</b>


**Figure 20 – Need for Travelling Showpeople households in Three Rivers that did not meet the Planning Definition by year periods**

<b>Year Period</b>	<b>Dates</b>	<b>Need</b>
0 – 5	2024 – 28	0
6 – 10	2029 – 33	0
11 – 15	2034 – 38	0
16 – 17	2039 – 40	0
<b>0 – 17</b>	<b>2024 – 40</b>	<b>0</b>

## Appendix E: Site and Yard List

Site/Yard	Tenure	Authorised	Unauthorised
Land adjacent to 321B Uxbridge Road	Private	1	-
The Oaklands	Private	24	-
Fir Trees	Private	2	-
Little Lily	Private	9	-
Little Liz	Private	10	-
Keepers Cottage	Unauthorised	-	3
<b>Total Pitches</b>		<b>46</b>	<b>3</b>
Rear of 317-319 Uxbridge Road	Private	16	-
Rear of 321 Uxbridge Road	Private	2	-
Brickfield Farm	Tolerated	-	15
Meander	Tolerated	-	2
Wood Yard	Tolerated	-	2
<b>Total Plots</b>		<b>18</b>	<b>19</b>
<b>TOTAL</b>		<b>64</b>	<b>22</b>

# Appendix F: Questionnaire

<div style="border: 1px solid black; height: 60px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; padding: 2px;">Interview or Proxy?</div>		<div style="border: 1px solid black; height: 60px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; padding: 2px;">Project Code</div>
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## GTAA Questionnaire

**Introduction**

Good morning / afternoon My name is [INTERVIEWER] from Opinion Research Services, working on behalf of [CLIENT]

The Council are undertaking a study of Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showmen household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households.

All questions are optional and all information you provide will be processed by ORS in accordance with the Data Protection Act and GDPR. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showmen households

**A: General Information**

**Q1. Name of planning authority**

Please write in

**Q1b Sub area (if needed)**

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☐  
  
☐  
  
☐

**Q2. Address & pitch number**

Please write in

**Q3. Date of visit**

Please write in – DD/MM/YY

**Q4. Time of visit**

Please write in – HH:MM

**Q5. Status of Private Site?**

Private rented

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Private owned

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N/A

☐  
  
☐  
  
☐

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<p><b>Q6. Name of respondent</b></p> <p>Please write in</p> <div style="border: 1px solid black; height: 60px; margin-top: 5px;"></div> <p><b>Q7. Which of these best describes you?</b></p> <p>READ OUT: Please tick ONE box only</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td style="border-bottom: 1px dashed black;">Romany Gypsy</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Irish Traveller</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Scots Gypsy or Traveller</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Travelling Showmen</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">New Traveller</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">English Traveller</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Welsh Gypsy</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Non Traveller</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> <tr><td style="border-bottom: 1px dashed black;">Other</td><td style="border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td></tr> </table> <p>Please write in</p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div> <p><b>Q8. How many units are on the pitch?</b></p> <p>Please write a number in each box</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 80%;">Mobile homes / Static caravans</td><td style="border: 1px solid black; width: 20%;"></td></tr> <tr><td style="padding-top: 20px;">Touring caravans</td><td style="border: 1px solid black; padding-top: 20px;"></td></tr> <tr><td style="padding-top: 20px;">Day Rooms / Utility Shed</td><td style="border: 1px solid black; padding-top: 20px;"></td></tr> <tr><td style="padding-top: 20px;">Bungalows / Bricks and Mortar</td><td style="border: 1px solid black; padding-top: 20px;"></td></tr> <tr><td style="padding-top: 20px;">Other (e.g. Park Home or American Caravan)</td><td style="border: 1px solid black; padding-top: 20px;"></td></tr> </table> <p><b>Q9. Is this site your main place of residence?</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px dashed black;">Yes</td> <td style="width: 10%; border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td> <td style="width: 60%; border-bottom: 1px dashed black;"><b>SKIP TO Q11</b></td> </tr> <tr> <td>No</td> <td style="text-align: right;"><input type="checkbox"/></td> <td><b>ANSWER Q10</b></td> </tr> </table>	Romany Gypsy	<input type="checkbox"/>	Irish Traveller	<input type="checkbox"/>	Scots Gypsy or Traveller	<input type="checkbox"/>	Travelling Showmen	<input type="checkbox"/>	New Traveller	<input type="checkbox"/>	English Traveller	<input type="checkbox"/>	Welsh Gypsy	<input type="checkbox"/>	Non Traveller	<input type="checkbox"/>	Other	<input type="checkbox"/>	Mobile homes / Static caravans		Touring caravans		Day Rooms / Utility Shed		Bungalows / Bricks and Mortar		Other (e.g. Park Home or American Caravan)		Yes	<input type="checkbox"/>	<b>SKIP TO Q11</b>	No	<input type="checkbox"/>	<b>ANSWER Q10</b>	<p><b>Q10. Where is your main residence?</b></p> <p>Please write in</p> <div style="border: 1px solid black; height: 110px; margin-top: 5px;"></div> <p><b>Q11. How long have you lived here?</b></p> <p>Years and months</p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div> <p>IF MOVED IN PAST FIVE YEARS ASK</p> <p><b>Q12. Where did you move from?</b></p> <p>Please write in</p> <div style="border: 1px solid black; height: 50px; margin-top: 5px;"></div> <p><b>Q13. Do you live here out of choice or because there is no other option?</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%; border-bottom: 1px dashed black;">Choice</td> <td style="width: 10%; border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td> <td style="width: 30%; border-bottom: 1px dashed black;"><b>SKIP TO Q15</b></td> </tr> <tr> <td>No other option</td> <td style="text-align: right;"><input type="checkbox"/></td> <td><b>ANSWER Q14</b></td> </tr> </table> <p><b>Q14. Why do you feel there is no other choice?</b></p> <p>Please write in</p> <div style="border: 1px solid black; height: 200px; margin-top: 5px;"></div> <p><b>Q15. Is this site suitable for your household?</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px dashed black;">Yes</td> <td style="width: 10%; border-bottom: 1px dashed black; text-align: right;"><input type="checkbox"/></td> <td style="width: 60%; border-bottom: 1px dashed black;"><b>SKIP TO Q17</b></td> </tr> <tr> <td>No</td> <td style="text-align: right;"><input type="checkbox"/></td> <td><b>ANSWER Q16</b></td> </tr> </table>	Choice	<input type="checkbox"/>	<b>SKIP TO Q15</b>	No other option	<input type="checkbox"/>	<b>ANSWER Q14</b>	Yes	<input type="checkbox"/>	<b>SKIP TO Q17</b>	No	<input type="checkbox"/>	<b>ANSWER Q16</b>
Romany Gypsy	<input type="checkbox"/>																																														
Irish Traveller	<input type="checkbox"/>																																														
Scots Gypsy or Traveller	<input type="checkbox"/>																																														
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Yes	<input type="checkbox"/>	<b>SKIP TO Q17</b>																																													
No	<input type="checkbox"/>	<b>ANSWER Q16</b>																																													

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**Q16. Why do you feel this site isn't suitable?**

PROBE: SCHOOLS, WORK, HEALTHCARE, FAMILY AND FRIENDS

Please write in

**Q17. How many separate families or single adults live on this pitch?**

Please write a number in the box

**B: HOUSEHOLD DEMOGRAPHICS****Q18. Please tell me about the members of your household**

Please complete below for the main household on this pitch. Any further families pertinent to this pitch should be included in section G using the format below.

For example, a seven year old daughter should be entered as

<b>F</b>	<b>07</b>
<b>Daughter</b>	

Person 1

GENDER	AGE
<b>Interviewee</b>	

Person 2

GENDER	AGE

Person 3

GENDER	AGE

Person 4

GENDER	AGE

Person 5

GENDER	AGE

Person 6

GENDER	AGE

Person 7

GENDER	AGE

Person 8

GENDER	AGE

Person 9

GENDER	AGE

Person 10

GENDER	AGE

**How many additional families or single adults are included in Section G?**

Please write a number

**C: ACCOMMODATION NEEDS****Q19. How many families or single adults living on this pitch will need a pitch of their own in the next five years?**

An adult is defined as 18+

Please write a number

**Q20. How many of your children will need a home of their own in the next 5 years?**

Please write a number

IF ZERO SKIP TO Q24

**Q21. Do the individuals counted above currently live on this site?**

Yes ☐ **GO TO Q22**

No ☐ **SKIP TO Q23**

**Q22. Would they wish to stay here and, if not, where would they wish to move to?**

Please write in

**Q23. Where do they currently live? And would they wish to move to this site or another local site if possible?**

Please write in

#### D: FUTURE ACCOMMODATION NEEDS

**Q24. Do you plan to move from this site in the next five years?**

Yes ☐ **GO TO Q32**

No ☐ **SKIP TO Q36**

**Q25. Why do you plan to move?**

Please write in

**Q26. Where do you plan to move to?**

Another site in this area ☐

A site in another council area ☐

Bricks & mortar in this area ☐

Bricks & mortar in another council area ☐

Other (e.g. land they own elsewhere) ☐

Please provide more detail on the answer above

**Q27. Would you prefer to buy a site or rent on a public or private site?**

Private buy ☐

Private rent ☐

Public rent ☐

**Q28. Can you afford to buy a private pitch or site?**

Yes ☐

No ☐

Don't know ☐

**Q29. Are you aware of, or do you own any land that has potential for new pitches**

Yes ☐ **GO TO Q37**

No ☐ **SKIP TO Q38**

**Q30. Where is the site and who owns it?**

Please write in

#### E: Travelling

**Q31. How many trips, living in a caravan or a trailer, have you or members of your family made away from your permanent base in the last 12 months?**

0 ☐ **SKIP TO Q44**

1 ☐

2 ☐

3 ☐ **GO TO Q39**

4 ☐

5+ ☐

**Q32. Which family members travelled?**

All the family ☐

Adult males ☐

Other ☐

Please write in

**Q33. What were the reasons for travelling?**

- Work ☐
- Holidays ☐
- Visiting family ☐
- Fairs ☐
- Other ☐

If work, please write I profession or trade;  
and if fairs, holidays or visiting family,  
probe whether this involves any elements  
of work.

**Q34. At what time of year do you or family members usually travel?**

- All year ☐
- Summer ☐
- Winter ☐

**Q35. How long do you usually travel for?**

Please write in

**Q36. Where do you or family members usually stay when they are travelling?**

- LA transit sites ☐
- Private transit sites ☐
- Roadside ☐
- Friends / Family ☐
- Other ☐

Please write in

**IF BEEN TRAVELLING - GO TO Q49**

**NON-TRAVELLING ANSWER Q44 - Q48**

**Q37. Are there any reasons you don't travel at the moment?**

Please write in

**Q38. Have you or family members ever travelled**

- Yes ☐ **GO TO Q46**
- No ☐ **SKIP TO Q49**

**Q39. When did you or family members last travel?**

Please write in

**Q40. What were the reasons for travelling?**

- Work ☐
- Holidays ☐
- Visiting family ☐
- Fairs ☐
- Other ☐

Please write in or list profession if for work. If for work, please write profession or trade; and if fairs, holidays or visiting family, probe whether this involves any elements of work.

<p><b>Q41. Why do you not travel anymore?</b></p> <p>Children in school <input type="checkbox"/></p> <p>Ill health <input type="checkbox"/></p> <p>Old age <input type="checkbox"/></p> <p>Settled now <input type="checkbox"/></p> <p>Nowhere to stop <input type="checkbox"/></p> <p>No work opportunities <input type="checkbox"/></p> <p>Other <input type="checkbox"/></p> <p>Please write in</p> <p><b>Q42. Do you or other family members plan to travel in the future</b></p> <p>Yes <input type="checkbox"/> <b>ANSWER Q50</b></p> <p>No <input type="checkbox"/> <b>SKIP TO Q51</b></p> <p>Don't know <input type="checkbox"/> <b>SKIP TO Q51</b></p> <p><b>Q43. When and why do you / they plan to travel?</b></p> <p>Please write in</p> <p><b>Q44. Is there anything else you'd like to tell us about your travelling patterns?</b></p> <p>Please write in</p> <p><b>F: Contact information</b></p> <p><b>Q45. Is there anything else you'd like to tell us about this site and your accommodation needs?</b></p> <p>Please write in</p>	<p><b>Q46. Would you like ORS to contact you again regarding future needs assessments?</b></p> <p>Yes <input type="checkbox"/> <b>GO TO Q54</b></p> <p>No <input type="checkbox"/> <b>SKIP TO Q56</b></p> <p><b>47. Would you like the Council to contact you about your accommodation needs?</b></p> <p>Yes <input type="checkbox"/> <b>GO TO Q55</b></p> <p>No <input type="checkbox"/> <b>SKIP TO Q56</b></p> <p><b>Q48. Can I confirm the details they should use to contact you?</b></p> <p>We cannot guarantee if and when they will make contact with you.</p> <p>Name</p> <p>Phone number</p> <p>Email address</p> <p><b>Q48a. Do you know of anyone living in Bricks and Mortar who we should contact for this study?</b></p> <p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p><b>Q48b. Can you provide their contact details?</b></p> <p>Name</p> <p>Phone number</p> <p>Email address</p> <p><b>If can't provide details will you ask them to contact us on 0800 0789786</b></p>
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**G: Any notes / Extra information**

Interviewer: please use this space for any additional information including details about additional households

**Interviewer Declaration: I confirm that this interview was conducted in accordance with all interviewing guidelines and that the data collected is accurately recorded**

Interviewer Name:	
Interviewer Signature:	
Date:	

## **Appendix G: Technical Note on Household Formation and Growth Rates**



## Technical Note

# Gypsy and Traveller Household Formation and Growth Rates

June 2020

**Opinion Research Services**





As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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# Household Growth Rates

## Abstract and Conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but until 2013 little detailed work had been done to assess their likely scale. ORS undertook work in 2013 to assess the likely rate of demographic growth for the Gypsy and Traveller population and concluded that the figure could be as low 1.25% per annum, but that best available evidence supports a national net household growth rate of 1.50% per annum.
2. This analysis was produced as a separate document in 2013 and then updated in 2015 ([www.opinionresearch.co.uk/formation2015](http://www.opinionresearch.co.uk/formation2015)) in light of comments from academics, planning agents and local authorities. The 2015 document was complex because there was still serious dispute as to the level of demographic growth for Gypsies and Travellers in 2015. However, ORS now consider these disputes have largely been resolved at Planning Appeals and Local Plan Examinations, so we consider that much of the supporting evidence is now no longer required to be in the document.
3. This current document represents a shortened re-statement to our findings in 2015 to allow for easier comprehension of the issues involved. It contains no new research and if the reader wishes to see further details of the supporting information, they should review the more detailed 2015 report.

## Introduction

4. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors.

## Modelling Population and Household Growth Rates

5. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths, in-/out-migration and household dissolution. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context in 2013, ORS modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for population and household forecasting). To do so, we supplemented the available national statistical sources with data derived from our own surveys.

## Migration Effects

6. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents.

## Population Profile

7. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. The ethnicity question in the 2011 Census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the Census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.

**Table 1 - Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)**

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9
Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

## Birth and Fertility Rates

8. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year.
9. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of fertility rates of the UK Gypsy and Traveller community, in *'Ethnic identity and inequalities in*

*Britain: The dynamics of diversity* by Dr Stephen Jivraj and Professor Ludi Simpson (published May 2015). The authors use the 2011 Census data to estimate the TFR for the Gypsy and Traveller community as 2.75.

10. ORS used our own multiple survey data to investigate the fertility rates of Gypsy and Traveller women. The ORS data shows that on average Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to infer an average of 3 children per woman during her lifetime, which is broadly consistent with the estimate of 2.75 children per woman derived from the 2011 Census.

## Death Rates

11. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) *'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative'*, University of Sheffield).
12. Therefore, in our population growth modelling we used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 Census (and also in ORS's own survey data).

## Modelling Outputs

13. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling, undertaken in PopGroup, projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum. If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.50% per annum. To generate an 'upper range' rate of population growth, we assumed an implausible TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.90% per annum.

## Household Growth

14. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller childless or single person households.
15. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.25%-1.50% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
16. Based on the 2011 Census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.60% of household representatives are aged 16-24, compared with 8.70% in the Gypsy and Traveller population. ORS's survey data shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 2 - Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	Number of households - England	Percentage households - England	Number of households – Gypsy and Traveller	Percentage households – Gypsy and Traveller
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

17. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers

Table 3 - Household Type (Source: UK Census of Population 2011)

Household Type	Number of households - England	Percentage households - England	Number of households – Gypsy and Traveller	Percentage households – Gypsy and Traveller
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

18. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents with dependent children, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.25%-1.50% per annum Gypsy and Traveller population growth rate is likely to lead to a household growth rate of 1.25%-1.50% per annum

## Summary Conclusions

19. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.50% per annum. Some local authorities might allow for a household growth rate of up to 2.50% per annum, to

provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, lower estimates should be used.

20. The outcomes of this Technical Note can be used to provide an estimate of local new household formation rates by adjusting the upper national growth rate of 1.50% based on local demographic characteristics.
21. In addition, in certain circumstances where the numbers of households and children are higher or lower than national data has identified, or the population age structure is skewed by certain age groups, it may not be appropriate to apply a percentage rate for new household formation. In these cases, a judgement should be made on likely new household formation based on the age and gender of the children identified in local household interviews. This should be based on the assumption that 50% of households likely to form will stay in any given area and that 50% will pair up and move to another area, while still considering the impact of dissolution. This is based on evidence from over 140 GTAAAs that ORS have completed across England and Wales involving over 4,300 household interviews.

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# Three Rivers District Council Gypsy and Traveller Accommodation Assessment (GTAA)

## Final Report

July 2025



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# 1.EXECUTIVE SUMMARY

## Introduction and Methodology

- 1.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the Three Rivers District Council (the Council) area.
- 1.2 This GTAA provides a credible evidence base which can be used to support the preparation of Local Plan Policies and, where appropriate, the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2025 - 2041. This covers the Council's Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS). The outcomes of this study supersede the outcomes of the previous GTAA for the Council.
- 1.3 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the Council area through a combination of desk-based research, stakeholder interviews, and engagement with members of the Travelling Community. This includes those living on all known sites, yards, and encampments, as well as seeking to engage with households living in bricks and mortar accommodation.
- 1.4 A total of 44 interviews or proxy interviews were completed with Gypsies and Travellers living on sites in Three Rivers. A total of 20 interviews were completed with Travelling Showpeople yards in Three Rivers.
- 1.5 A total of 9 stakeholder interviews were also completed.
- 1.6 The baseline date for the study is June 2025.

## Background

- 1.7 Gypsy and Travellers Local Plan Policies should give consideration to addressing need from households that meet the 2024 PPTS planning definition through the intensification or expansion of the existing sites and yards where need has been identified. Consideration should then be given to granting planning permission for any temporary and unauthorised sites or yards. If any residual need remains then consideration will need to be given to the allocation of new pitches or plots.
- 1.8 The Council should also put in place a Criteria-Based Local Plan Policy (as suggested in Paragraph 11 in the PPTS) to manage the need from Undetermined households, as well as to deal with any potential windfall applications, potential need from in-migration, or from bricks and mortar.
- 1.9 Paragraph 62 of the National Planning Policy Framework (NPPF) 2024 sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*
- 1.10 Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- 1.11 Footnote 27 to this section states that ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.*’

## Key Findings

- 1.12 The findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need in relation to Gypsies, Travellers and Travelling Showpeople. Whilst the findings in this report are aggregated totals for the whole of Three Rivers, the Council have been provided with more detailed breakdowns to support the preparation of any future Local Plan Policies.

### Pitch Needs – Gypsies and Travellers

- 1.13 In June 2025 the Council identified 54 Gypsy and Traveller pitches in Three Rivers:
- » 6 private sites with permanent planning permission (54 pitches);
- 1.14 Our research concluded that 56 Gypsy or Traveller households met the 2024 PPTS planning definition and there were 3 households where it was not possible to confirm their status. These 3 households are likely to meet the 2024 PPTS planning definition and are referred to as Undetermined Households for the purposes of this GTAA.
- 1.15 Our research identified a need for **37 pitches** emerging from the 56 households that met the 2024 PPTS planning definition. This is made up of 14 pitches for concealed/doubled-up/over-crowded households; 4 pitches from a 5-year need from teenage children; 3 pitches from in-migration/roadside; and 16 pitches from new household formation, using a formation rate of 1.7%.

- <sup>1.16</sup> There is also a need for **4 pitches** emerging from the 3 undetermined households. This is made up of a modelled need for 1 pitch from concealed/doubled-up/over-crowded households or single adults and 3 pitches from new household formation, using the ORS national formation rate of 1.50%.
- <sup>1.17</sup> The overall pitch needs for Gypsies and Travellers for the period 2025 - 2041 are summarised in Figure 1.

**Figure 1 – Need for Gypsy and Traveller households in Three Rivers (2025 – 2041)**

Status	2025 – 2041
Need from households who meet the Planning Definition	37
Undetermined	4
<b>TOTAL</b>	<b>41</b>

- <sup>1.18</sup> The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in **Error! Reference source not found..**

**Figure 2 – Need for Gypsy and Traveller households by year periods**

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	21	1
6 – 10	2030 – 34	5	1
11 – 15	2035 – 39	7	1
16	2040 – 41	4	1
<b>0 – 16</b>	<b>2025 – 41</b>	<b>37</b>	<b>4</b>

## Plot Needs – Travelling Showpeople

- <sup>1.19</sup> In June 2025 the Council identified 37 Travelling Showpeople plots in Three Rivers:
- » 2 private Travelling Showmen's yards (18 plots)
  - » 3 tolerated Travelling Showmen's yards (19 plots)
- <sup>1.20</sup> Our research concluded that 24 Travelling Showpeople households met the 2024 PPTS planning definition and there were 16 households where it was not possible to confirm their status. These 16 households are likely to meet the 2024 PPTS planning definition and are referred to as Undetermined Households for the purposes of this GTAA.
- <sup>1.21</sup> Our research identified a need for 6 plots emerging from the 24 households that met the 2024 PPTS planning definition. This is made up of 4 plots from concealed/doubled-up/over-crowded households; and 2 plots from a 5-year need from teenage children.
- <sup>1.22</sup> There is also a need for 10 plots emerging from the 16 undetermined households. This is made up of a modelled need for 3 plots from concealed/doubled-up/over-crowded households or single adults; a modelled need for 2 plots for a 5-year need from teenage children; and 5 plots from new household formation, using the ORS national formation rate of 1.50%.
- <sup>1.23</sup> The overall plot needs for Travelling Showpeople for the period 2025 – 2041 are summarised in Figure 3.



**Figure 3 – Need for Travelling Showpeople households in Three Rivers (2025 – 2041)**

Status	2025 – 2041
Need from households who meet the Planning Definition	6
Undetermined	10
<b>TOTAL</b>	<b>16</b>

- 1.24 The need from households that meet the planning definition and for undetermined households can be distributed across year periods as shown in **Error! Reference source not found.4**.

**Figure 4 – Need for Travelling Showpeople households by year periods**

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	6	5
6 – 10	2030 – 34	0	2
11 – 15	2035 – 39	0	2
16	2040 – 41	0	1
<b>0 – 16</b>	<b>2025 – 41</b>	<b>6</b>	<b>10</b>

## Recommendations

### Gypsy and Traveller Recommendations

- 1.25 A summary of recommendations for addressing need from Gypsies and Travellers are set out below:
- » It is recommended that need for households living on private sites is addressed through new pitch allocations and the intensification, expansion or reconfiguration of existing sites – considering some of the alternative approaches set out below. In addition, the Council should consider completing a Pitch Deliverability Assessment (PDA) to explore the capacity of existing sites to accommodate additional pitches and/or caravans in more detail.
  - » The Council will have to consider how to address need from undetermined households. In terms of the Local Plan Policies. The Council should consider a Criteria-Based Local Plan Policy.
  - » The Council will need to carefully consider how to address any needs from households who may seek to move to Three Rivers (in-migration/windfall), or from households currently living in bricks and mortar who may wish to move to a site. The Council should consider a Criteria-Based Local Plan Policy.
  - » Regarding need from households that did not meet the planning definition, in general terms, it is the Government's intention that any need for households that do not fall within the PPTS planning definition should be met as a part of general housing need, through separate Local Plan Policies as set out in Paragraph 63 of the NPPF.
  - » For private sites it is also recommended that alternative approaches should be considered when seeking to address the levels of need identified in this GTAA, especially when seeking to meet the need through the intensification or expansion of existing sites. In addition, consideration should be given to granting permanent planning permission for any sites with temporary permission and for any unauthorised sites.
  - » The first approach to consider is in relation to single concealed or doubled-up adults and teenagers who will be in need of a pitch of their own in the next 5 years. In the short to medium term, it is likely that the accommodation need of these individuals could be met

- through additional touring caravans on existing sites which are, generally, each equivalent to the provision of a pitch, as opposed to more formally set out pitches.
- » The second approach to consider is for sites occupied by larger extended family groups. Again, sites like this may be able to meet the overall accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites which are, generally, each equivalent to the provision of a pitch – as opposed to more formally set out sites with separate pitches. It is common for conditions in Decision Notices for Travellers sites to simply place limits on the numbers and types of caravans as opposed to placing limits on the number of pitches.
  - » Future need from new household formation could also be met through natural turnover of pitches over time, and through the consideration of enforcing against pitches not found to be occupied by Gypsies or Travellers.

## **Travelling Showpeople Recommendations**

- <sup>1.26</sup> A summary of recommendations for addressing need from Travelling Showpeople are set out below:
- » It is recommended that the current need could be addressed through the intensification or expansion of existing yards in Three Rivers.

## **Transit Recommendations**

- <sup>1.27</sup> A summary of recommendations for addressing transit need are set out below:
- <sup>1.28</sup> Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- <sup>1.29</sup> It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- <sup>1.30</sup> In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

## 2.INTRODUCTION

- 2.1 The primary purpose of this Gypsy and Traveller Accommodation Assessment (GTAA), is to provide a robust assessment of current and future need for Gypsies, Travellers, and Travelling Showpeople accommodation in Three Rivers District Council.
- 2.2 The outcomes of the study will supersede the outcomes of the previous Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment (GTAA) completed for the Council
- 2.3 The study provides an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Policy for Traveller Sites (PPTS) 2024, the Housing and Planning Act (2016), the National Planning Policy Framework (NPPF) 2024, and the Planning Practice Guidance (PPG) 2021.
- 2.4 The GTAA provides a robust assessment of need for Gypsy, Traveller and Travelling Showpeople accommodation in the study area. It can be used to aid the implementation of the Council's Local Plan Policies and the provision of Traveller pitches and plots covering the period 2025 - 2041 to meet the 15-year requirements of the PPTS and the Council's Local Plan period.
- 2.5 In addition to identifying current and future permanent accommodation needs, it seeks to identify any need for transit provision.
- 2.6 The study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).
- 2.7 The baseline date for the study is June 2025.

## Definitions

### Planning Policy for Traveller Sites (PPTS) 2024

- 2.8 For the purposes of the planning system, the current planning definition of a Traveller is set out in [PPTS \(2024\)](#). The planning definition set out in Annex 1 states that:

*1. For the purposes of this planning policy "gypsies and travellers" means:*

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*2. For the purposes of this planning policy, "travelling showpeople" means:*

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.*

*3. For the purposes of this planning policy, "travellers" means "gypsies and travellers" and "travelling showpeople" as defined above.*

*4. For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use plots for "travelling showpeople", which may / will need to incorporate space or to be split to allow for the storage of equipment.*

**Planning Policy for Traveller Sites, Ministry of Housing, Communities and Local Government (MHCLG)  
December 2024**

## Definition of Travelling

- <sup>2.9</sup> One of the most important questions that GTAA's need to address in terms of applying the planning definition is *what constitutes a nomadic way or life or nomadism*. This has been determined through case law.
- <sup>2.10</sup> **R v South Hams District Council (1994)** – defined Gypsies as *"persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)"* This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.
- <sup>2.11</sup> In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- <sup>2.12</sup> In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if they led a nomadic way of life *only seasonally*.
- <sup>2.13</sup> The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought Judicial Review of the Local Authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- <sup>2.14</sup> **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base which they set out from and return to.

- <sup>2.15</sup> Following the changes to the PPTS in 2024 the planning definition now includes *all other persons with a cultural tradition of nomadism or of living in a caravan*.
- <sup>2.16</sup> As a result of this it can be concluded that all Gypsies and Travellers now meet the PPTS 2024 planning definition of a Traveller.
- <sup>2.17</sup> There were no changes to the planning definition of a Travelling Showperson made in 2024, but it's assumed that all Travelling Showpeople will meet the Annex 1 planning definition.

## Legislation and Guidance for Gypsies and Travellers

- <sup>2.18</sup> Policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:
- » [The Housing Act, 1985](#)
  - » [The Equality Act, 2010](#)
  - » [The Housing and Planning Act, 2016](#)
  - » [Planning Practice Guidance<sup>1</sup> \(PPG\), 2021](#)
  - » [Planning Policy for Traveller Sites \(PPTS\), 2024](#)
  - » [National Planning Policy Framework \(NPPF\), 2024](#)
- <sup>2.19</sup> In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews also need to be taken into consideration. Relevant examples have been included in this report where appropriate.
- <sup>2.20</sup> The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2024). It should be read in conjunction with the National Planning Policy Framework (NPPF) 2024.

## Planning Policy for Traveller Sites (PPTS) 2024

- <sup>2.21</sup> The PPTS (2024, Paragraph 4), sets out the overall aims of the policy in respect of Traveller sites:
- » That local planning authorities should make their own assessment of need for the purposes of planning.
  - » To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
  - » To encourage local planning authorities to plan for sites over a reasonable timescale.
  - » That plan-making and decision-taking should protect Green Belt from inappropriate development.
  - » To promote more private traveller site provision while recognising that there will always be travellers who cannot provide their own sites.
  - » That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

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<sup>1</sup> With particular reference to the sections on Housing needs of different groups (May 2021).

- » For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- » To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- » To reduce tensions between settled and traveller communities in plan-making and planning decisions.
- » To enable provision of suitable accommodation from which travellers can access education, health, welfare, and employment infrastructure.
- » For local planning authorities to have due regard to the protection of local amenity and local environment.

<sup>2.22</sup> PPTS states in Paragraph 9 that:

*Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.*

<sup>2.23</sup> PPTS goes on to state in Paragraph 10 that Local Planning Authorities should in producing their Local Plan:

- » Identify and annually update a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.
- » Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- » Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).
- » Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- » Protect local amenity and environment.

<sup>2.24</sup> Local Authorities have a duty to ensure a 5-year land supply to meet any need that is identified Traveller sites. However, PPTS also sets out in Paragraph 11 that:

*Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.*

## National Planning Policy Framework (2024)

<sup>2.25</sup> The most recent version of the NPPF was issued in December 2024.

<sup>2.26</sup> Paragraph 62 of the NPPF sets out that in determining the minimum number of homes needed, *strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance.*

- <sup>2.27</sup> Paragraph 63 then states that [emphasis added] *Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**; people who rent their homes and people wishing to commission or build their own homes.*
- <sup>2.28</sup> Footnote 27 to this section states that ‘*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.*’

## **Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities and others [2022]**

- <sup>2.29</sup> In October 2022 the Court of Appeal handed down judgment in *Lisa Smith v The Secretary of State for Levelling Up, Housing & Communities [2022] EWCA Civ 1391*. The case was a challenge to a specific appeal decision and concerned whether the planning definition of Gypsies and Travellers contained in Annex 1 of the PPTS (2015) is discriminatory against Travellers who are settled and who no longer travel for work due to old age or disability. The Court of Appeal allowed the appeal and quashed the Inspectors decision from 2018 and referred the case back to The Secretary of State for redetermination.
- <sup>2.30</sup> Whilst certain parts of the PPTS planning definition of a Traveller were found to be discriminatory, as the PPTS 2015 itself was not the subject of the case it was not quashed or declared unlawful at this time.
- <sup>2.31</sup> As a result of the Lisa Smith Judgement, changes to the PPTS in 2023, and following consultation on the NPPF in 2024, the Government made changes to the PPTS in December 2024 to effectively bring all Gypsies and Travellers under the current planning definition.

## 3.METHODOLOGY

### Background

- 3.1 Opinion Research Services (ORS) have been undertaking Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments (GTAA's) for over ten years. Our approach has been regularly refined in light of changes to PPTS in 2015, 2023 and 2024, the Housing and Planning Act (2016), the NPPF (2024), and the PPG (2021), as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS contains a number of requirements for local authorities which must be addressed in a GTAA. Paragraph 7 in the PPTS sets out that local authorities should (a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups; (b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up- to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and (c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.
- 3.3 ORS would note that the ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in multiple areas across England<sup>2</sup>.

### Our approach to Fieldwork

- 3.4 The stages below provide a summary of the methodology that was used to complete this study.



<sup>2</sup>ORS have attended Gypsy and Traveller Local Plan Examination Sessions in areas including Bedford, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Cheltenham, Colchester, Cotswold, Daventry, East Hertfordshire, Gloucester, Leicester, Maldon, Milton Keynes, Newark and Sherwood, Newham, Runnymede, South Cambridgeshire, South Northamptonshire, Spelthorne, Tewkesbury, and Waverley.



## Desk-Based Review

- 3.5 The secondary data that was reviewed and collated included:
- » Census data.
  - » Traveller Caravan Count data.
  - » Planning history for existing sites and yards.
  - » Records of unauthorised sites/encampments.
  - » Information on active planning applications and appeals.
  - » Information on active enforcement actions.
  - » Existing Needs Assessments and other relevant local studies.
  - » National and local policy, guidance, and best practice.

## Stakeholder Engagement

- 3.6 Stakeholder engagement involves three core groups; local Council Officers, neighbouring Planning Officers and representative bodies.
- 3.7 Council Officers help provide a fuller understanding of local issues. This includes information about the progress made in addressing any needs identified in previous GTAA's and about any unauthorised developments. ORS had a total of 3 interviews with Council Officers from Three Rivers District Council.
- 3.8 Planning Officers from neighbouring authorities allow us to explore cross-border issues including transit provision. For this project we engaged with Officers from
- » Buckinghamshire Council
  - » Dacorum Borough Council
  - » Hertsmere Borough Council
  - » London Borough of Harrow Council
  - » London Borough of Hillingdon Council
  - » St Albans City and District Council
  - » Watford Borough Council

## Community Engagement

- 3.9 Once we have identified all authorised and unauthorised sites/yards and encampments in the study area we seek to complete an interview with each household. ORS use a census rather than sampling approach as we consider this to be more robust. Sample based approaches can lead to an underestimate of need and GTAA's using sampling are regularly challenged by the Planning Inspectorate.
- 3.10 ORS make at least three separate attempts to contact a household including leaving calling cards and offering appointments.
- 3.11 Interviews are undertaken by experienced fieldworkers who work on our GTAA studies across England and Wales. To ensure consistency in data collection ORS use a standard questionnaire which can be seen in **Appendix C**. The interview captures current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and

travelling characteristics. It also asks about the type of pitches households may require in the future – for example private or socially rented, together with any features they may wish to be provided.

- 3.12 The survey includes questions about the travelling characteristics of household members. Whilst responses to these questions are less relevant now following the changes to the PPTS in 2024, ORS feel that this is useful data which supports analysis. This information is useful when seeking to address any identified need as those who do and don't travel may have different pitch/plot requirements.
- 3.13 Where we are unable to complete an interview, we will attempt to gather basic information about each pitch/plot through a proxy interview from sources including neighbouring residents and site management.
- 3.14 In addition to the household interviews fieldworkers make an overall physical assessment of each site to determine any opportunities for intensification or expansion to meet future needs.

## Bricks and Mortar Households

- 3.15 The 2021 Census recorded 33 households who identified as either Gypsies or Irish Travellers or Roma, who lived in a house or bungalow in Three Rivers, and 23 living in a flat or maisonette.
- 3.16 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards; information from stakeholder interviews; and information from housing registers. Interviews are sought with all identified households.
- 3.17 Through this approach the GTAA endeavoured to enable households living in bricks and mortar the opportunity to make their views known.
- 3.18 ORS do not make assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed, as in our experience this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. We do not model need from households living in bricks and mortar.

## Timing of the Fieldwork

- 3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. ORS aim to complete fieldwork during the non-travelling season, and to avoid days of known local or national events.
- 3.20 The fieldwork for this GTAA was completed between July 2024 and September 2024 and researchers were able to collect information on majority of residents living on sites or yards.

## Our Analysis

### Applying the PPTS Planning Definition

- <sup>3.21</sup> The primary change to the PPTS in December 2024 in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Wherever possible we use the data collected in household interviews to identify if they meet the planning definition. In some cases, information from planning applications and planning appeal Decision Notices is also used.
- <sup>3.22</sup> Through the inclusion of *all other persons with a cultural tradition of nomadism or of living in a caravan* in the Annex 1 definition this now includes all Travellers. There were no changes to the definition of Travelling Showpeople in Annex 1.

### Dealing with Undetermined Households

- <sup>3.23</sup> A GTAA has to consider the needs of any households where it is not possible to determine if they meet the planning definition – usually because we have been unable to complete an interview. These are defined as undetermined households
- <sup>3.24</sup> Whilst there is no guidance that sets out how the needs of these households should be addressed ORS consider it necessary to estimate potential need from these households. This is an additional need figure over and above the need identified for households that meet the planning definition.
- <sup>3.25</sup> The estimate sought to identify potential current and future need from any pitches/plots known to be temporary or unauthorised; through modelling need from concealed-doubled-up households and from teenagers based on the outcomes from completed interviews; and through new household formation. As the demographics of the undetermined households are unknown, ORS use our national household formation rate of 1.50% in our analysis to estimate future need.
- <sup>3.26</sup> Following the changes to the planning definition in PPTS 2024 it has been assumed that all undetermined households will meet the definition. However, it is recommended that need from undetermined households is addressed through Criteria-Based Local Plan Policies and not through specific allocations.
- <sup>3.27</sup> The ORS approach to addressing the need arising from undetermined households was supported by the Planning Inspector for a Local Plan Examination for Maldon District Council, Essex (29<sup>th</sup> June 2017). He concluded:

*The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.*

## Calculating the Current and Future Need

- <sup>3.28</sup> To identify need, PPTS requires an assessment for current and future pitch requirements but does not provide a standard methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

### Supply of Pitches

- <sup>3.29</sup> Our desk-based research and fieldwork determines the vacant, and potentially available supply in the study area:
- » Current vacant pitches/plots.
  - » Pitches/plots currently with planning consent due to be developed within 5 years.
  - » Pitches/plots vacated by people moving to housing.
  - » Pitches/plots vacated by people moving from the study area (out-migration).
- <sup>3.30</sup> It is important when seeking to identify supply from vacant pitches/plots that they are in fact available for general occupation – i.e. on a public or social rented site/yard, or on a private site/yard that is run on a commercial basis with anyone being able to rent a pitch/plot if they are available. Typically, vacant pitches/plots on small private family sites/yards are not included as components of available supply but can be used to meet any current and future need from the family living on the site/yard.

### Current Need

- <sup>3.31</sup> The second stage is to identify components of current need:
- » Households on unauthorised developments for which planning permission is not expected.
  - » Households living on sites/yards with temporary planning permission.
  - » Concealed, doubled-up or over-crowded households (including single adults).
  - » Teenage children in need of a pitch/plot of their own in the next 5 years.
  - » In-migration/roadside.
  - » Households in bricks and mortar needing to move to sites/yards.
  - » Households in need on waiting lists for public sites.
- <sup>3.32</sup> ORS are increasingly identifying households and adult household members who have been forced to leave sites due to over-crowding or exceeding planning conditions on the number of caravans permitted on sites. These households are typically living on the roadside or doubling-up on pitches in neighbouring local authorities. ORS include these households as components of hidden need and term them displaced in-migration.

### Future Need

- <sup>3.33</sup> The final stage is to identify components of future need. This includes the following components:
- » New household formation.

- <sup>3.34</sup> Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 7 of this report.

## Pitch Turnover

- <sup>3.35</sup> Some assessments of need make use of pitch/plot turnover as an ongoing component of supply. ORS do not agree with this approach or with making any assumptions about annual turnover rates. ORS consider that this approach frequently ends up significantly under-estimating need as, in the majority of cases, vacant pitches/plots are not in fact available to meet any local need. The use of turnover has been the subject of a number of Inspectors Decisions, for example **APP/J3720/A/13/2208767** found a GTAA to be unsound when using turnover and concluded:

*West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However, the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration, yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.*

- <sup>3.36</sup> In addition, Best Practice for Assessing the Accommodation Needs of Gypsies and Travellers<sup>3</sup> produced jointly in June 2016 by organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

*Assessments involving any form of pitch turnover in their supply relies upon making assumptions, a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.*

- <sup>3.37</sup> As such, other than current vacant pitches/plots that are known to be available, annual pitch/plot turnover has not been considered as a formal component of supply in this GTAA. However, natural turnover of pitches/plots on public and private sites/yards should continue to be monitored by the Council. In particular, the natural turnover of pitches/plots can help to meet future need over time from new household formation.

## Transit Provision

- <sup>3.38</sup> GTAA studies require the identification of demand for transit provision. While the majority of Gypsies and Travellers have permanent bases either on sites/yards or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population a range of sites/yards can be developed to accommodate Gypsies and Travellers as they move through different areas.

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<sup>3</sup> See [www.londongypsiesandtravellers.org.uk/resources/](http://www.londongypsiesandtravellers.org.uk/resources/) for details.

- » **Transit sites** - full facilities where Gypsies and Travellers might live temporarily (for up to three months) – for example, to work locally, for holidays or to visit family and friends.
- » **Emergency stopping places** - more limited facilities.
- » **Temporary sites and stopping places** - only temporary facilities to cater for an event.
- » **Negotiated stopping places** - agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time.

- 3.39 Transit sites serve a specific function of meeting the needs of Gypsy and Traveller households who are visiting an area or who are passing through on the way to somewhere else. A transit site typically has a restriction on the length of stay of usually around 12 weeks and has a range of facilities such as water supply, electricity, and amenity blocks.
- 3.40 An alternative to or in addition to a transit site is an emergency stopping place. This type of site also has restrictions on the length of time for which someone can stay on it but usually has more limited facilities with typically only a source of water and chemical toilet disposal provided.
- 3.41 Another alternative is negotiated stopping. The term negotiated stopping is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not include permanent built transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the local authority and the (temporary) residents regarding expectations on both sides.
- 3.42 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.
- 3.43 The Criminal Justice and Public Order Act 1994 (Section 62a) is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62a of the Act allows the police to direct trespassers to remove themselves and their vehicles and property from any land where a suitable pitch is available for the caravan or each of the caravans on a relevant caravan site which is situated in the local authority's area (or within the county in two-tier local authority areas). Relevant sites need to be managed by a Local Authority or a Registered Social Landlord (RSL). The police have no powers to direct people to private transit sites or yards.
- 3.44 Consideration also has to be given to the Police, Crime, Sentencing and Courts Act which came in to force in June 2022. Part 4 of the Act gives the Police additional powers to deal with unauthorised encampments through new offences relating to residing on land without consent in or with a vehicle and new powers in relation to the seizure of property.
- 3.45 In order to investigate the potential need for transit provision when undertaking work to support the GTAA, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the Ministry for Housing, Communities and Local Government (MHCLG) Traveller Caravan Count. The outcomes of the Stakeholder Interviews with Council Officers and with Officers from neighbouring planning authorities were also taken into consideration when determining this element of need in the study area.

## 4. GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES/YARDS AND POPULATION

### Introduction

- 4.1 One of the main considerations of this GTAA is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople.
- 4.2 A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size<sup>4</sup>. A site is a collection of pitches which form a development for Gypsies and Travellers.
- 4.3 Whilst there is no standard size for a Gypsy and Traveller pitch, guidance<sup>5</sup> recommends an average pitch size of 320m<sup>2</sup>. However, it also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses for example) and can contribute to affordability.
- 4.4 For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically occupied by Travelling Showpeople.
- 4.5 Whilst there is also no standard size for a Travelling Showpeople plot, guidance<sup>6</sup> recommends an average plot size of 2,000m<sup>2</sup>. However, this should be viewed with some caution given the age of the guidance. In more recent years many Showpeople have sought to diversify their working practices and do not now need as much space for the storage or maintenance of larger rides. Recent planning applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes.
- 4.6 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is a public residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.7 The alternative to a public residential site is a private residential site/yard for Gypsies, Travellers and Travelling Showpeople, respectively. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches/plots on existing private sites/yards.

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<sup>4</sup> Whilst it has now been withdrawn, Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer [a static caravan or park home for example] and touring caravan, parking space for two vehicles and a small garden area.

<sup>5</sup> Leeds City Council: Gypsy and Traveller Site Design Guide (2020).

<sup>6</sup> The Showmen's Guild: Travelling Showpeople's Sites – A Planning Focus (2007).

- 4.8 These two forms of accommodation are the equivalent to private ownership and private rent for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.9 The Gypsy, Traveller and Travelling Showpeople population also has other types of sites/yards due to its transient nature, as described more fully in Chapter 3. These are known as transit sites and they provide many of the same facilities as a residential site, except that there is a maximum occupancy period of residence which can vary from a few days or weeks to a period of months.
- 4.10 An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities.
- 4.11 Both of these two types of transit provision are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel.
- 4.12 A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.13 Further occurrences for the Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Travellers or with the approval of the landowner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Travellers and are usually referred to as roadside encampments.

## Sites and Yards

- 4.14 In the area on the base date for the GTAA, there were
- » 6 private sites with permanent planning permission (54 pitches);
  - » 5 Travelling Showmen's yard (37 plots).
- 4.15 See **Appendix B: Site and Yard List** for further details.

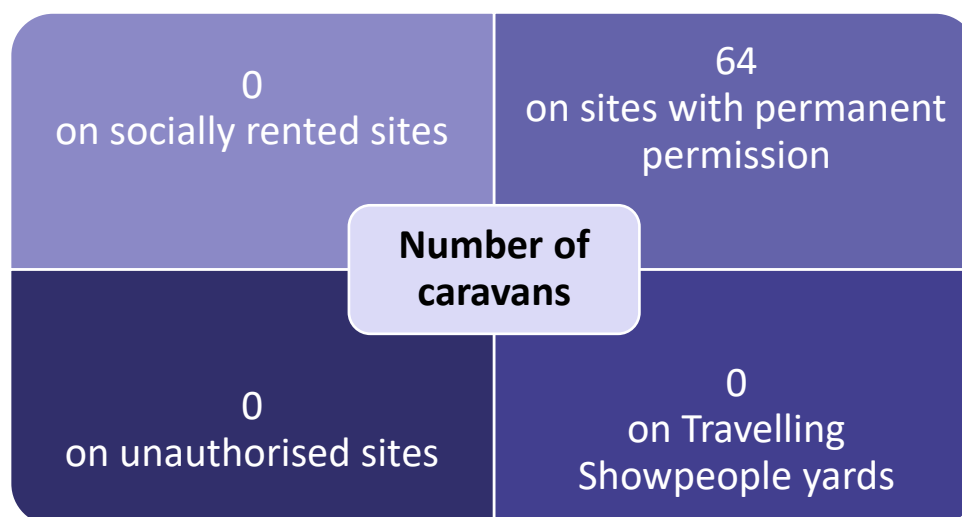
**Figure 5 - Total amount of provision in Three Rivers (2025)**

Category	Sites/Yards	Pitches/Plots
<b>Gypsies and Travellers</b>		
Public sites	0	0
Private sites with permanent planning permission	6	54
Private sites with temporary planning permission	0	0
Tolerated sites	0	0
Unauthorised sites	0	0
Public transit sites	0	0
<b>Sub-Total</b>	<b>6</b>	<b>54</b>
<b>Travelling Showpeople</b>		
Private yards	2	18
Tolerated yards	3	19
Unauthorised yards	0	0
<b>Sub-Total</b>	<b>5</b>	<b>37</b>
<b>TOTAL</b>	<b>11</b>	<b>91</b>



## MHCLG Traveller Caravan Count

- <sup>4.16</sup> Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count<sup>7</sup> which is conducted by each Local Authority in England on a specific date in January and July of each year<sup>8</sup> and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England.
- <sup>4.17</sup> As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches/plots or resident households. The count is merely a ‘snapshot in time’ conducted by the Local Authority on a specific day, and any unauthorised sites/yards or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites/yards on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site/yard visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to support the identification of the need to provide for transit provision and this is set out later in this report.
- <sup>4.18</sup> The most recent Traveller Caravan Count (January 2025) reported the following:



<sup>7</sup> The Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans in 2013

<sup>8</sup> Only in January for Travelling Showpeople

## 5. STAKEHOLDER ENGAGEMENT

### Introduction

- 5.1 ORS completed engagement with a range of stakeholders to complement the information gathered through interviews with members of the Travelling Community. This engagement took the form of telephone or Teams interviews.
- 5.2 The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 5.3 A total of 3 interviews were undertaken with Council Officers and other local stakeholders from the study area.
- 5.4 In order to explore issues relating to cross boundary working, ORS interviewed a Planning Officer from 7 neighbouring local authorities:
- » Buckinghamshire Council
  - » Dacorum Borough Council
  - » Hertsmere Borough Council
  - » London Borough of Harrow Council
  - » London Borough of Hillingdon Council
  - » St Albans City and District Council
  - » Watford Borough Council
- 5.5 Due to issues surrounding data protection, and to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The views expressed in this section of the report represent a balanced summary of the views expressed by stakeholders, and on the views of the individuals concerned, rather than the official policy of their Council or organisation.

### Views of Key Stakeholders and Council Officers

#### Accommodation Needs

- 5.6 Since the last GTAA, the Council have sought to address the low interview response rate achieved during the previous assessment.
- 5.7 The Council are aware of anecdotal evidence which suggests there is a need for extra pitches.

#### Short-term Encampments and Transit Provision

- 5.8 Only a small number of encampments occur in the area on an annual basis. Occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area.
- 5.9 If necessary, the Council will issue enforcement notices to encampments.

## Cross Border Issues

- <sup>5.10</sup> No cross-border issues with neighbouring authorities were identified.
- <sup>5.11</sup> The Council are in communication with Hertfordshire County Council on a regular basis regarding any issues relating to Travellers. Additionally, the Council also line of communication with neighbouring authorities should any issues that need addressing occur.

## Future Priorities and Any Further Issues

- <sup>5.12</sup> A future priority for the Council is to find suitable locations to address any unmet need.

## Neighbouring Authorities

- <sup>5.13</sup> Potential cross-border issues were raised by the following authorities:
- » Buckinghamshire Council
  - » London Borough of Hillingdon Council
  - » Watford Borough Council
- <sup>5.14</sup> Three Rivers District Council were made aware of all issues raised by each Council
- <sup>5.15</sup> The following authorities responded to indicate no potential cross-border issues:
- » Dacorum Borough Council
  - » Hertsmere Borough Council
  - » London Borough of Harrow Council
  - » St Albans City and District Council

## 6.SURVEY OF TRAVELLING COMMUNITIES

### Interviews with Travellers

- 6.1 One of the major components of this study was a detailed survey of the Gypsy and Traveller population living in the study area including efforts to engage with the bricks and mortar community.
- 6.2 At the base date for the GTAA there were 6 privately owned sites with permanent planning permission; 2 authorised Travelling Showmen's yards; and 3 tolerated Travelling Showmen's yards. See **Appendix B: Site and Yard ListB** for further details.
- 6.3 The table below set out the number of pitches/plots, the number of interviews that were completed, and any reasons why interviews were not able to be completed.

**Figure 6 – Interviews completed in Three Rivers**

Site/Yard Type	Pitches/Plots	Interviews	Reasons for not completing interviews/additional interviews
<b>Gypsies and Travellers</b>			
<b>Private Sites</b>			
Land adjacent 321B Uxbridge Road, Mill End	1	0	1x Site undeveloped
The Oaklands, Bedmond	24	24	-
Fir Trees, Sarratt	2	1	1x Storage
Little Lily, Kings Langley	9	1	3x No contact, 5x Undeveloped
Little Liz, Kings Langley	17	15	2x Non-Travellers
Keepers Cottage, Chorleywood	1	3	-
<b>Sub-Total</b>	<b>54</b>	<b>44</b>	
<b>Travelling Showpeople</b>			
<b>Authorised</b>			
Rear of 317-319 Uxbridge Road, Mill End	16	15	1 x Vacant
Rear of 321 Uxbridge Road, Mill End	2	2	
<b>Tolerated</b>	<b>18</b>	<b>17</b>	
Brickfield Farm, Carpenders Park	15	0	15 x Refusals
Meander, Sarratt	2	2	
Wood Yard, Sarratt	2	1	1 x No contact
<b>Sub-Total</b>	<b>19</b>	<b>3</b>	
<b>TOTAL</b>	<b>91</b>	<b>64</b>	

## 7.CURRENT AND FUTURE PITCH PROVISION

### Introduction

- <sup>7.1</sup> This section focuses on the pitch/plot provision that is needed in the study area currently and to 2041. This includes both current unmet need and need which is likely to arise in the future<sup>9</sup>. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources.
- <sup>7.2</sup> We would note that this section is based upon a combination of the household interviews, planning records and stakeholder interviews. In many cases, the survey data is not used in isolation but instead is used to validate information from planning records or other sources.
- <sup>7.3</sup> This section also identifies whether there is a need for any transit provision.

### New Household Formation Rates

- <sup>7.4</sup> ORS prepared a Technical Note on Gypsy and Traveller Household Formation and Growth Rates in 2015 and updated it in 2020, and again in 2025. The main conclusions are set out here and the full paper is in Error! Reference source not found.D.
- <sup>7.5</sup> The Technical Note concludes that the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence for net Gypsy and Traveller population and household growth rates above 2.00% per annum.
- <sup>7.6</sup> In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers.
- <sup>7.7</sup> This view has been supported by Planning Inspectors in a number of Decision Notices. The Inspector for an appeal in Doncaster that was issued in November 2016 (**Ref: APP/F4410/W/15/3133490**) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used concluded:

*In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.50% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.*

<sup>9</sup> See Paragraphs 3.41 and 3.42 for details of components on current and future need.

- 7.8 Another case was in relation to an appeal in Guildford that was issued in March 2018 (**Ref: APP/W/16/3165526**) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

*There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.*

## Local Approach to New Household Formation Rates

- 7.9 This GTAA takes full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site surveys. The baseline includes all current authorised households, all households identified as being in current need (including concealed/doubled-up households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, household dissolution, and in-/out-migration.
- 7.10 Overall, the household growth rate used for the assessment of future needs is informed by local evidence. This local demographic evidence has been used to adjust the ORS national growth rate of 1.50% up or down based on the proportion of those aged under 18.
- 7.11 However, in certain circumstances where the numbers of households and children are low, or the population age structure cohorts are skewed by certain age groups, it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement is made on likely new household formation based on the age and gender of the children. This is based on the assumption that 50% of households likely to form will stay in the area. This is based on evidence from other GTAA's that ORS have completed across England and Wales.
- 7.12 The approach that has been applied in Three Rivers for this GTAA is set out below:
- » For Gypsies and Travellers who met the planning definition 41% of residents were aged under 18 so the ORS national formation rate of 1.50% has been uplifted to 1.70%.
  - » For Gypsies and Travellers who did not meet the planning definition there were very low numbers of children aged under 18 so household demographics have been used to determine formation.
  - » For Travelling Showpeople who met the planning definition there were no children aged under 18 other than 2 teenagers who have been identified as components of need so there is no further household formation.
  - » For Travelling Showpeople who did not meet the planning definition there were no children so there is no further household formation.
- 7.13 In addition, the ORS national rate of 1.50% has been used to estimate growth for undetermined Travellers.

- <sup>7.14</sup> It should also be noted that new household formation has been calculated from year 6 of the GTAA period onwards. New household formation for years 0-5 of the GTAA period is from teenagers in need of a pitch/plot in the next 5 years who have been identified as components of need in the household interviews. This eliminates any double counting in the assessment of need.

## Breakdown by 5 Year Bands

- <sup>7.15</sup> In addition to tables which set out the overall need for Gypsies and Travellers, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches/plots, pitches/plots with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, net movement from bricks and mortar, and in-migration/roadside need) in the first 5 years. The total net new household formation is then split across the remaining GTAA period.

## Household Planning Status

- <sup>7.16</sup> The table below sets out the planning status of households for the Three Rivers District Council GTAA. It is important to note that this table records numbers of households and not the number of pitches or plots.

**Figure 7 – Planning status of households in Three Rivers**

Status	Meet Planning Definition	Undetermined
<b>Gypsies and Travellers</b>		
Public Sites	0	0
Private Sites	53	3
Temporary Sites	0	0
Tolerated Sites	0	0
Unauthorised Sites	0	0
Roadside/In-Migration	3	0
B&M	0	0
<b>Sub-Total</b>	<b>56</b>	<b>3</b>
<b>Travelling Showpeople</b>		
Private Yards	20	0
Tolerated Yards	4	16
Unauthorised Yards	0	0
Roadside/In-Migration	0	0
B&M	0	0
<b>Sub-Total</b>	<b>24</b>	<b>16</b>
<b>TOTAL</b>	<b>80</b>	<b>19</b>

- <sup>7.17</sup> Figure 7 shows that for Gypsies and Travellers in Three Rivers, 56 households meet the planning definition of a Traveller, and 24 Travelling Showmen's households meet the planning definition.

- <sup>7.18</sup> It was not possible to make contact with 3 Gypsy and Traveller households and 16 Travelling Showmen's households during the fieldwork period as households either refused to take part in an interview or were not present during the fieldwork period. These households are recorded as Undetermined for the purposes of the GTAA.

## Interviews with Gypsies and Travellers in Bricks and Mortar

- <sup>7.19</sup> Despite all of the efforts that were made it was not possible to identify and interview any households living in bricks and mortar.

## Migration/Roadside

- <sup>7.20</sup> The study also sought to identify any need from households who have been forced to move from sites/yards due to overcrowding and who are currently living on the roadside or on sites/yards in other local authorities – and who have strong family links with households in Three Rivers. These are referred to as roadside households or displaced in-migration.
- <sup>7.21</sup> Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. The household interviews identified 3 households living on roadside predominantly in Three Rivers with a need to move to a permanent pitch/plot in the area.
- <sup>7.22</sup> ORS have found no firm evidence from other local studies that have been completed recently of any households wishing to move to Three Rivers. Therefore, apart from the 3 households set out above, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch/plot requirements are driven by locally identifiable need rather than speculative modelling assumptions.
- <sup>7.23</sup> It is important to note that any applications for new sites or additional pitches/plots as a result of in-migration should be seen as windfall need and should be dealt with by Criteria-Based Local Plan Policies.

## Public Sites

- <sup>7.24</sup> There are no public sites in Three Rivers.



## Gypsy and Traveller Needs

### Pitch Needs – Gypsies and Travellers that met the PPTS 2024 Planning Definition

<sup>7.25</sup> Analysis of the household interviews indicated that there is a need from 14 pitches from concealed/doubled-up/over-crowded households; 4 pitches from a 5-year need from teenage children; 3 pitches from roadside/in-migration; and for 16 from new household formation. Therefore, the overall level of need for those households who met the planning definition of a Gypsy or Traveller in Three Rivers is for 37 pitches over the GTAA period.

**Figure 8 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition**

Gypsy & Traveller – Meeting Planning Definition	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	14
5 year need from teenage children	4
Movement from bricks and mortar	0
In-Migration/Roadside	3
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>21</b>
<b>Future Need</b>	
New household formation	16
<i>(Household base 57 and formation rate 1.7%)</i>	
<i>(Household base 6 and formation from demographics)</i>	
<b>Total Future Need</b>	<b>16</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>37</b>

**Figure 9 – Need for Gypsy and Traveller households in Three Rivers that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2025 – 29	21
6 – 10	2030 – 34	5
11 – 15	2035 – 39	7
16	2040 – 41	4
<b>0 – 16</b>	<b>2025 – 2041</b>	<b>37</b>

## Pitch Needs – Undetermined Gypsies and Travellers

<sup>7.26</sup> The assessment identified a need for up to 4 pitches for undetermined households. This is made up of a modelled need for 1 pitch for concealed or doubled-up households or single adults and a need for 3 pitches from new household formation from a maximum of 6 households using the ORS national formation rate of 1.50%.

**Figure 10 – Need for undetermined Gypsy and Traveller households in Three Rivers**

Gypsy & Traveller – Undetermined	Pitches
<b>Supply of Pitches</b>	
Available supply from vacant public and private pitches	0
Available supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on pitches with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	1
5 year need from teenage children	0
Movement from bricks and mortar	0
In-Migration/Roadside	0
Households on waiting lists for public sites	0
<b>Total Current Need</b>	<b>1</b>
<b>Future Need</b>	
New household formation	3
<i>(Household base 6 and formation rate 1.50%)</i>	
<b>Total Future Need</b>	<b>3</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>4</b>

**Figure 11 – Need for undetermined Gypsy and Traveller households in Three Rivers by year periods**

Year Period	Dates	Need
0 – 5	2025 – 29	1
6 – 10	2030 – 34	1
11 – 15	2035 – 39	1
16	2040 – 41	1
<b>0 – 16</b>	<b>2025 – 2041</b>	<b>4</b>

## Travelling Showpeople Needs

### Plot Needs – Travelling Showpeople that met the PPTS 2024 Planning Definition

- <sup>7.27</sup> Analysis of the household interviews indicated that there is a need from 4 plots from concealed/doubled-up/over-crowded households; 2 plots from a 5-year need from teenage children; and for 0 from new household formation. Therefore, the overall level of need for those households who met the planning definition of a Travelling Showperson in Three Rivers is for 6 plots over the GTAA period.

**Figure 12 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition**

Travelling Showpeople – Meeting Planning Definition	Plots
<b>Supply of Plots</b>	
Available supply from vacant public and private plots	0
Available supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on plots with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	4
5 year need from teenage children	2
Movement from bricks and mortar	0
In-Migration/Roadside	0
<b>Total Current Need</b>	<b>6</b>
<b>Future Need</b>	
New household formation	0
<i>(no Households Formation)</i>	
<b>Total Future Need</b>	<b>0</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>6</b>

**Figure 13 – Need for Travelling Showpeople households in Three Rivers that met the Planning Definition by year periods**

Year Period	Dates	Need
0 – 5	2025 – 29	6
6 – 10	2030 – 34	0
11 – 15	2035 – 39	0
16 – 20	2040 – 41	0
0 – 16	2025 – 2041	6

## Plot Needs – Undetermined Travelling Showpeople

<sup>7.28</sup> The assessment identified a need for up to 10 plots for undetermined households. This is made up of a modelled need for 3 plots for concealed or doubled-up households or single adults; a modelled need of 2 plots for teenagers; and a need for 5 plots from new household formation from a maximum of 21 households using the ORS national formation rate of 1.50%.

**Figure 14 – Need for undetermined Travelling Showpeople households in Three Rivers**

Travelling Showpeople – Undetermined	Plots
<b>Supply of Plots</b>	
Available supply from vacant public and private plots	0
Available supply from plots on new sites	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
<b>Total Supply</b>	<b>0</b>
<b>Current Need</b>	
Households on unauthorised developments	0
Households on plots with temporary planning permission	0
Concealed households/Doubling-Up/Over-Crowding	3
Movement from bricks and mortar	2
5 year need from teenage children	0
In-Migration/Roadside	0
<b>Total Current Need</b>	<b>5</b>
<b>Future Need</b>	
New household formation	5
<i>(Household base 21 and formation rate 1.50%)</i>	
<b>Total Future Need</b>	<b>5</b>
<b>Net Plot Need = (Current and Future Need – Total Supply)</b>	<b>10</b>

**Figure 15 – Need for undetermined Travelling Showpeople households in Three Rivers by year periods**

Year Period	Dates	Need
0 – 5	2025 – 29	5
6 – 10	2030 – 34	2
11 – 15	2035 – 39	2
16	2040 – 41	1
<b>0 – 16</b>	<b>2025 – 2041</b>	<b>10</b>

## Transit Requirements

- <sup>7.29</sup> When determining the potential need for transit provision the assessment has looked at data from the MHCLG Traveller Caravan Count; the outcomes of the stakeholder interviews; and local records on numbers of recorded encampments.

### MHCLG Traveller Caravan Count

- <sup>7.30</sup> Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans. This makes it very difficult to interpret in relation to assessing future need because it does not count pitches/plots or resident households.
- <sup>7.31</sup> The count is also only a twice yearly (January and July) snapshot in time conducted by local authorities on a specific day, and any caravans on unauthorised sites/yards or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites/yards on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- <sup>7.32</sup> Data from the Traveller Caravan Count shows that there have been no unauthorised caravans on land not owned by Travellers recorded in the study area in recent years.

### Stakeholder Interviews and Local Data

- <sup>7.33</sup> The outcomes of the Stakeholder Interviews were that only a small number of encampments occur in the area on an annual basis, and that these occurrences are sporadic throughout the year and attendance of family events is a very common reason for stopping in the area. If necessary, the Council will issue enforcement notices to encampments.

## Transit Recommendations

- <sup>7.34</sup> Due to historic low numbers of encampments, it is not recommended that there is a need for additional formal public transit provision in Three Rivers at this time.
- <sup>7.35</sup> The situation relating to levels of unauthorised encampments should continue to be monitored. As well as information on the size and duration of the encampments, this monitoring should also seek to gather information from residents on the reasons for their stay in the local area; whether they have a permanent base or where they have travelled from; and whether they have any need or preference to settle permanently in the local area. This information should be collected as part of a Welfare Assessment (or similar).
- <sup>7.36</sup> It is recommended that a review of the evidence base relating to encampments, including the monitoring referred to above, should be undertaken on an annual basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether the current approach is preferable.

- <sup>7.37</sup> In the short-term the Council should continue to use its current approach when dealing with encampments and management-based approaches such as negotiated stopping agreements could also be considered.
- <sup>7.38</sup> The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides. See [www.negotiatedstopping.co.uk](http://www.negotiatedstopping.co.uk) for further information.
- <sup>7.39</sup> Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewerage disposal point and refuse disposal facilities.

## 8.CONCLUSIONS

- 8.1 This GTAA provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the Housing and Planning Act 2016, Planning Practice Guidance 2021, Planning Policy for Traveller Sites 2024, and the National Planning Policy Framework 2024. It also provides an evidence base which can be used to support Local Plan Policies.

### Gypsies and Travellers

- 8.2 In Three Rivers, for the GTAA period 2025 - 2041, there is a need for:
- » 37 pitches for Gypsy and Traveller households that meet the 2024 PPTS planning definition.
  - » 4 pitches for Undetermined Gypsy and Traveller households.
- 8.3 In general terms need identified in a GTAA is seen as need for pitches. As set out in Chapter 4 of this report, the now withdrawn *Government Guidance on Designing Gypsy and Traveller Sites* recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area. This guidance relates primarily to the provision of pitches on public sites but can also be more broadly applied to the provision of pitches on private sites.
- 8.4 Whilst there is no standard size for a Gypsy and Traveller pitch, Guidance<sup>10</sup> recommends an average pitch size of 320m<sup>2</sup> but also suggests that a variety of pitch sizes – including small, medium and large pitches can enable different sized families to be accommodated on sites (equivalent to two, three and four-bedroom houses) and can contribute to affordability.
- 8.5 For need arising from public sites the Council will need to consider the expansion or intensification of these sites, or for new sites(s), as it is unlikely that this need could be addressed through the provision of pitches on new private sites.
- 8.6 For need arising from private sites the Council will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been identified the Council should also consider the regularisation of sites with temporary planning permission and of unauthorised sites.
- 8.7 The Council will also need to carefully consider how to address any potential needs from Undetermined households; from households seeking to move to Three Rivers (in-migration); or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the Council should continue to use or put in place Criteria-Based Local Plan Policies as suggested in the PPTS.
- 8.8 Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against any pitches not found to be occupied by Gypsies or Travellers.
- 8.9 Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to enable an accurate review of Local Plan allocations to be made.

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<sup>10</sup> Leeds City Council: Gypsy and Traveller Site Design Guide (2020).



## Travelling Showpeople

- 8.10 In summary, in Three Rivers, for the GTAA period 2025 - 2041, there is a need for:
- » 6 plots for Travelling Showpeople households that meet the 2024 PPTS planning definition.
  - » 10 plots for Undetermined Travelling Showpeople households.
- 8.11 In general terms need identified in a GTAA is seen as need for plots. Whilst there is no standard size for a Travelling Showpeople plot, guidance<sup>11</sup> recommends an average plot size of 2,000m<sup>2</sup>. However, this should be viewed with some caution given the age of the guidance. In recent years many Showpeople have sought to diversify their working practices and many do not now need as much space for the storage and maintenance of larger rides. Recent planning applications in other local authorities have seen plans for new yards put forward including a variety of plot sizes.
- 8.12 For need arising from private yards the Council will need to consider the expansion or intensification of these yards, or to address need through new yard/plot allocations. Where they have been identified the Council should also consider the regularisation of yards with temporary planning permission and of unauthorised yards.
- 8.13 The Council will also need to carefully consider how to address any potential need from Undetermined households; from households seeking to move to Three Rivers (in-migration); or from households currently living in bricks and mortar who may wish to move to a yard. In terms of the Local Plan Policies, the Council should continue to use or put in place Criteria-Based Local Plan Policies as suggested in PPTS.
- 8.14 Future need from new household formation could also be met through natural turnover of plots over time, or through enforcing against plots not found to be occupied by Travelling Showpeople.
- 8.15 Whilst the findings in this report are aggregated totals for the whole of Three Rivers due to data protection issues, the Council have more detailed data to enable an accurate review of Local Plan allocations to be made.

## Transit Provision

- 8.16 Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), it is not recommended that there is a need for a formal public transit site in Three Rivers at this time.
- 8.17 It is recommended that a review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken on a Hertfordshire-wide basis. This will establish whether there is a need for investment in any new transit provision or emergency stopping places, or whether a managed approach is preferable.
- 8.18 In the short-term the Council should continue to use its current approach when dealing with unauthorised encampments and management-based approaches such as negotiated stopping agreements could also be considered.

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<sup>11</sup> The Showmen's Guild: Travelling Showpeople's Sites – A Planning Focus (2007).

## Summary of Need to be Addressed – Gypsies and Travellers

- 8.19 Taking into consideration all of the elements of need that have been assessed in this GTAA, together with the assumptions on need from Undetermined households, the table below sets out the number of pitches that will need to be addressed.
- 8.20 Total need from Gypsy and Traveller households that meet the 2024 PPTS planning definition is for 37 pitches between 2025 and 2041, and total need from Undetermined households is for 4 pitches between 2025 and 2041.
- 8.21 The table below breaks total need down by:
- » Household that meet the planning definition.
  - » Undetermined households.
- 8.22 Need from households that meet the planning definition will need to be addressed through a Gypsy and Traveller Local Plan Policy through a combination of site/pitch allocations and through a Criteria-Based Local Plan Policy, and need from Undetermined households will have to be addressed through a Criteria-Based Local Plan Policy.

**Figure 16 – Total Need for Gypsy and Traveller households**

Year	2025 – 29	2030 – 34	2035 – 39	2040 – 41	2025 – 41
Meet Planning Definition (Allocations)	21	5	7	4	<b>37</b>
Undetermined (Criteria-Based Policy)	1	1	1	1	<b>4</b>
<b>TOTAL</b>	<b>22</b>	<b>6</b>	<b>8</b>	<b>5</b>	<b>41</b>

## Summary of Need to be Addressed – Travelling Showpeople

- 8.23 Taking into consideration all of the elements of need that have been assessed, together with the assumptions on need from Undetermined households, the table below sets out the number of plots that will need to be addressed as a result of the outcomes of the GTAA.
- 8.24 Total need from Travelling Showpeople households that meet the 2024 PPTS planning definition is for 6 plots between 2025 and 2041, and total need from Undetermined households is for 10 plots between 2025 and 2041.
- 8.25 The table below breaks total need down by:
- » Household that meet the planning definition.
  - » Undetermined households.
- 8.26 Need from households that meet the planning definition will need to be addressed through a Travelling Showpeople Local Plan Policy through a combination of yard/plot allocations and through a Criteria-Based Local Plan Policy, and need from undetermined households will have to be addressed through a Criteria-Based Local Plan Policy.

Figure 17 – Total Need for Travelling Showpeople households

Year	2025 – 29	2030 – 34	2035 – 39	2040 – 41	2025 – 41
Meet Planning Definition (Allocations)	6	0	0	0	6
Undetermined (Criteria-Based Policy)	5	2	2	1	10
TOTAL	11	2	2	1	16

# APPENDICES

## Appendix A: Glossary of Terms / Acronyms Used

### Glossary

**Amenity block** meaning a building where basic plumbing amenities are provided. This could include a bath, a shower, a WC and a sink.

**Bricks and mortar** is used to describe mainstream housing.

**Caravan** is used to describe mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.

**Concealed household** is used to describe households living within other households, who are unable to set up separate family units.

**Doubling-Up** refers to there being more than the permitted number of caravans on a pitch or plot.

**Emergency Stopping Place** is a temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

**Green Belt** refers to a land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; and to preserve the setting and special character of historic towns.

**Household Formation** is the process in which individuals form separate households. This is normally though adult children setting up their own household.

**In-migration** refers to movement of households into a region or community.

**Local Plans** are Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.

**Out-migration** refers to the Movement from one region or community in order to settle in another.

**Pitch/plot** is an area of land on a site or development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.

**Private site** is an authorised site owned privately. This can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

**Site** refers to an area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans, chalets, or vehicles. Can contain one or multiple pitches or plots.

**Social/Public/Council Site** is an authorised site owned by either the local authority or a Registered Housing Provider.

**Temporary planning permission** refers to a private site with planning permission for a fixed period of time.

**Tolerated site/yard** refers to long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought.

**Transit provision** refers to a site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.

**Unauthorised Development** refers to caravans on land owned by Gypsies and Travellers and without planning permission.

**Unauthorised Encampment** refers to caravans on land not owned by Gypsies and Travellers and without planning permission.

**Waiting list** is a record held by the local authority or site managers of applications to live on a site.

**Yard** is a name often used by Travelling Showpeople to refer to a site.

## Acronyms and Initials

<b>GTAA</b>	Gypsy and Traveller Accommodation Assessment
<b>LPA</b>	Local Planning Authority
<b>MHCLG</b>	Ministry for Housing, Communities and Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>ORS</b>	Opinion Research Services
<b>PPG</b>	Planning Practice Guidance
<b>PPTS</b>	Planning Policy for Traveller Sites
<b>TSP</b>	Travelling Showpeople

## Appendix B: Site and Yard List

Site/Yard	Planning Status	Authorised	Unauthorised
<b>Gypsies and Travellers</b>			
Land adjacent 321B Uxbridge Road, Mill End, WD3 8DS	Private	1	-
The Oaklands, Bedmond Road, Bedmond, WD5 0QE	Private	24	-
Fir Trees, Dawes Lane, Sarratt, WD3 6BG	Private	2	-
Little Lily, Land rear of 59 Toms Lane, Kings Langley, WD4 8NT	Private	9	-
Little Liz, Old House Lane, Kings Langley, WD4 8RS	Private	17	-
Keepers Cottage, Solesbridge Lane, Chorleywood, WD3 6AA	Private	1	-
<b>Total Pitches</b>		<b>54</b>	<b>0</b>
<b>Travelling Showpeople</b>			
Rear of 317-319 Uxbridge Road, Mill End, WD3 2DS	TSP - Private	16	-
Rear of 321 Uxbridge Road, Mill End, WD3 8DS	TSP - Private	2	-
Brickfield Farm, Oxhey Lane, Carpenders Park, WD19 5RF	TSP - Tolerated	15	-
Meander, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP - Tolerated	2	-
Wood Yard, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP - Tolerated	2	-
<b>Total Plots</b>		<b>37</b>	<b>0</b>
<b>TOTAL</b>		<b>91</b>	<b>0</b>

## Appendix C: Household Interview Questionnaire



### GYPSY, TRAVELLER & TRAVELLING SHOWMEN ACCOMMODATION NEEDS ASSESSMENT

Site/yard code

Pitch/plot no.

Pitch/plot location

#### INTERVIEWER INSTRUCTIONS:

This questionnaire should be used to record information about households that have been interviewed, either with a structured interview (where questions were asked as they are written on the questionnaire) or a semi-structured interview (where the information was gathered through discursive conversation).

Whilst not all households will be prepared to answer every question, it is important to record as much information as possible; but any information that can be provided will be used to inform the assessment. For all questions, you may prompt respondents with the available options as necessary. Please use the "Further Information and Notes" pages towards the end of the form to record any other details that could be relevant to the assessment.

If respondents provide information about other households either living on this site/yard or elsewhere, a separate Proxy Questionnaire should be used to record the information about each additional household.

#### INTERVIEWER: READ OUT

Good morning/afternoon/evening. My name is < > and I work for Opinion Research Services (ORS).

The Council is undertaking a Gypsy, Traveller and Travelling Showmen accommodation needs assessment in this area. They have asked ORS to try and contact every household from the Travelling Community living in their area to make sure that the needs assessment is accurate.

This important survey collects information about your accommodation on this site/yard, your own needs and needs of other members of your household, and details about your travelling. The information that you provide will help the Council better understand the accommodation needs of the Travelling Community. It will make sure that needs are properly assessed based on accurate and up-to-date information, so that the needs of every household get counted. The interview should take no more than 20 minutes, and any information that you provide will be treated in strict confidence; so I hope that you will take part.

#### INTERVIEWER: READ OUT IF NECESSARY

Only ORS will see your individual answers, the information will be kept secure and confidential and only anonymised data will be sent to the Council. Any information that you provide will be processed by ORS in line with the requirements of the UK Data Protection Act and the EU General Data Protection Regulation (GDPR). For more information, please go to [www.ors.org.uk/privacy](http://www.ors.org.uk/privacy)

If you would like to confirm my identity, you can contact ORS on Freephone 0800 078 9786. If you would like to confirm that ORS is a genuine research practice, you can contact the Market Research Society on Freephone 0800 975 9596.

---

## YOUR CURRENT ACCOMMODATION

---

**Q1. Are you and your household...?**

*INTERVIEWER: READ OUT. CROSS ALL THAT APPLY*

- Romany Gypsy
- Irish Traveller
- English Traveller
- Scottish Gypsy or Traveller
- Welsh Gypsy
- Travelling Showman
- New Traveller
- Non-Traveller
- Prefer not to say

**Q2a. How long have you lived on this site/yard?**

- Less than 12 months
- 12 months but less than 2 years
- 2 years but less than 5 years
- 5 years or longer → GO TO QUESTION 3
- No answer

**Q2b. Where did you previously live?****Q3a. Is this site/yard your permanent base?**

- Yes → GO TO QUESTION 4
- No
- No answer

**Q3b. If not, where is your permanent base?****Q4. Does your household own this site/yard or do you rent your pitch/plot?**

- Own the site/yard
- Privately rent the pitch/plot
- Public rent the pitch/plot
- Housing Association rent the pitch/plot
- No answer

**Q5a. Is this site/yard suitable for the needs of your household?**

- Yes → GO TO QUESTION 6
- No
- No answer

**Q5b Why do you feel that it isn't suitable?**



**Q6a. Do you plan to move from this site/yard within the next five years?**

- Yes
- No → GO TO QUESTION 7
- No answer

**Q6b Why do you plan to move?****Q6c. Where do you plan to live after you have moved?**

- Elsewhere in this council area
- Another council area *WRITE IN*

- No answer

**Q6d. Would you prefer to...?**

- Buy a site/yard or a private pitch/plot
- Rent on a private site/yard
- Rent on a public site
- Live in Bricks and Mortar
- No answer

---

**TRAVELLING**

---

**Q7a. Have you or any other members of your household ever travelled away from your permanent base?**

- Yes
- No → GO TO QUESTION 10
- No answer

**Q7b. How many trips has your household made over the last 12 months?****Q8. What are/were the reasons for travelling from your permanent base?**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

**INTERVIEWER: PROBE FULLY AND PROVIDE FURTHER DETAILS BELOW**

*If travelling for work, write in profession or trade, including frequency and length of trips*

*If travelling for fairs or other reasons, confirm if this involved any elements of work, and record nature of work undertaken*

*Please write in and continue in Notes section as necessary*

**Q9. Where do you usually stay?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Council transit sites
- Private transit sites
- On the roadside
- With family or friends
- Other WRITE IN
- No answer

**Q10. What are the main reasons for your household not travelling anymore?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- Settled now
- Children in school
- Ill health
- Old age
- Nowhere to stop
- No work opportunities
- Other reasons → PROVIDE DETAILS IN NOTES
- No answer

**Q11a. Do you or any other members of your household plan to travel in future?**

- Yes
- No → GO TO QUESTION 12
- No answer

**Q11b. What will be the reasons for travelling?****INTERVIEWER: CROSS ALL BOXES THAT APPLY**

- To work, including working/trading at fairs
- Visiting fairs, but not to work
- Visiting family or friends
- Holiday
- Other reasons
- No answer

---

**HOUSEHOLD DETAILS**

---

**Q12. How many people are in your household, and how many separate families are there?**  
Please count everyone that normally lives on this pitch/plot, including yourself.

number of people

number of families

For each person in your household please answer the following questions

**Q13a What is their relationship to you**

- Husband, wife or partner
- Son or daughter (inc. step-children)
- Brother or sister (inc. step-siblings)
- Mother or father (inc. step-parents)
- Grandchild
- Grandparent
- Relation - other
- Unrelated

**Q13b. What is their gender**

- Male
- Female
- Prefer not to say

**Q13c. What was their age last birthday**

--

**Q13d. Have they travelled away to work in the last 12 months**

- Yes
- No

**Q13e. Do they plan to travel away to work any time in the future**

- Yes
- No

*Repeat for each household member*

---

## ACCOMODATION NEEDS

---

**Q14a. If anyone currently living with you needs their own separate accommodation, how many pitches/plots are needed for them now, and how many will be needed within the next five years?**

pitches/plots for adults needed now

pitches/plots for adults needed within 5 years

pitches/plots for 13-17 year olds needed within 5 years

**Q14b. Would they want to stay on this site/yard?**

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

**Q15. Do you have any children or other family that are not currently living with you who need their own separate accommodation?**

- Yes → PROVIDE DETAILS IN NOTES
- No
- No answer

**Q15b How many pitches/plots would they need?**

**Q15c. Would they want to move to this site/yard?**

- Yes
- No – want to live elsewhere in this council area
- No – want to move to another council area
- No answer

**Q16. If separate accommodation was needed on this site/yard, would there be...?**

**INTERVIEWER: READ OUT. CROSS ONE BOX ONLY**

- Space available on the existing site/yard
- Potential to extend the boundary of the site/yard
- Need for space on another local site/yard
- No answer

**Q17a. Do you own or are you aware of any land that has potential for new pitches/plots?**

- Yes
- No → GO TO QUESTION 18
- No answer

**Q17b. Where is the land and who owns it?****Q18a. Do you have any family or friends, or know anyone from the Travelling Community currently living in Bricks and Mortar who we should contact for this study?**

- Yes
- No → GO TO FURTHER INFORMATION
- No answer

**Q18b Can you provide contact details for them?**

*INTERVIEWER: IF DETAILS REFUSED, READ OUT*

*If you aren't able to provide their details, please ask them to call ORS on Freephone 0800 078 9786 to make sure that their needs are counted*

---

**FURTHER INFORMATION AND NOTES**

---

Is there anything else you'd like to tell us about this site/yard, your travelling patterns and any future plans to travel, or the accommodation needs of you and your household?

## **Appendix D: Household Formation Rates**

# **ORS Technical Note: Gypsy and Traveller Household Formation and Growth Rates**

**January 2025**



Opinion Research Services, The Strand, Swansea SA1 1AF

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# 1. INTRODUCTION

## Abstract and Conclusions

- 1.1 National and local household formation and growth rates are important components of Gypsy and Traveller Accommodation Assessments (GTAAAs), but until 2013 little detailed work had been done to assess their likely scale. ORS undertook work in 2013 to assess the likely rate of demographic growth for the Gypsy and Traveller population and concluded that the figure could be as low as 1.25% per annum, but that best available evidence supports a national net household growth rate of 1.50% per annum.
- 1.2 This analysis was produced as a separate document in 2013 and then updated in 2015 and 2020 in light of comments from academics, planning agents and local authorities.
- 1.3 This current document represents an update to our findings in 2020 to consider the impact of the data from the 2021 UK Census of Population. This shows little change from the 2011 Census, so there is no change in the overall conclusions that support a national net household growth rate of 1.50% per annum.

## Introduction

- 1.4 Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher gross household formation rates.
- 1.5 However, while their gross rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing.
- 1.6 Therefore, the net rate of household growth is the gross rate of formation minus any reductions in households due to such factors.

## 2. MODELLING POPULATION AND HOUSEHOLD GROWTH RATES

- <sup>2.1</sup> The basic equation for calculating the rate of Gypsy and Traveller population growth is relatively simple: start with the base population and then calculate the average increase/decrease by allowing for births; deaths; in-/out-migration; and household dissolution.
- <sup>2.2</sup> Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context in 2013, ORS modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates. To do so, we supplemented the available national statistical sources with data derived from our own surveys.

### Migration Effects

- <sup>2.3</sup> Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration.
- <sup>2.4</sup> It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents.

### Population Profile

- <sup>2.5</sup> The main source for the rate of Gypsy and Traveller population growth is the UK 2011 and 2021 Censuses. This is due to the ethnicity question in the 2011 Census having a new option included, 'Gypsy and Irish Traveller' was added as a specific category and this option was repeated in the 2021 Census.
- <sup>2.6</sup> While non-response bias probably means that the size of the population was underestimated, the age profile the 2011 and 2021 Censuses provide is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
- <sup>2.7</sup> The 2011 Census gave a total population of 54,895 in England, while the 2021 Census shows a population of 67,690, which represents a 23% increase.
- <sup>2.8</sup> However, this is measuring a mixture of real population growth and greater compliance with the Census in 2021. In reality, the true population of Gypsies and Travellers in England is likely to be 200,000-250,000, so both numbers are just a sample of the overall population.
- <sup>2.9</sup> Comparing the 2011 and 2021 Census datasets, the share of the population aged under 16 years has fallen from 31.8% to 30.5%, while the share aged 65 years or more has risen from 3.7% to 4.9%. The older population is still likely to be an under-estimate, but the results are consistent with the pattern seen in almost all population in England of falling birth rates and rising life expectancy.

**Figure 1 – Age Profile for the Gypsy and Traveller Community in England 2011 and 2021**  
(Source: UK Census of Population 2011 and 2021)

Age Group	People 2021	Cumulative % 2011	People 2021	Cumulative % 2021
Age 0 to 4	5,725	10.4	6,535	9.7
Age 5 to 7	3,219	16.3	3,947	15.5
Age 8 to 9	2,006	19.9	2,547	19.2
Age 10 to 14	5,431	29.8	6,404	28.7
Age 15	1,089	31.8	1,212	30.5
Age 16 to 17	2,145	35.7	2,383	34.0
Age 18 to 19	1,750	38.9	2,107	37.1
Age 20 to 24	4,464	47.1	5,074	44.6
Age 25 to 29	4,189	54.7	4,889	51.9
Age 30 to 34	3,833	61.7	5,189	59.5
Age 35 to 39	3,779	68.5	4,611	66.3
Age 40 to 44	3,828	75.5	4,386	72.8
Age 45 to 49	3,547	82.0	3,982	78.7
Age 50 to 54	2,811	87.1	3,875	84.4
Age 55 to 59	2,074	90.9	3,196	89.1
Age 60 to 64	1,758	94.1	2,423	92.7
Age 65 to 69	1,215	96.3	1,638	95.1
Age 70 to 74	905	97.9	1,432	97.3
Age 75 to 79	594	99.0	882	98.6
Age 80 to 84	303	99.6	552	99.4
Age 85 and over	230	100.0	426	100.0
<b>Total</b>	<b>54,895</b>		<b>67,690</b>	

## Birth and Fertility Rates

- <sup>2.10</sup> The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 9.7% of the Gypsy and Traveller population – which means that, on average, 1.9% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 28.7% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year.
- <sup>2.11</sup> The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood.
- <sup>2.12</sup> ORS know of only one estimate of fertility rates of the UK Gypsy and Traveller community, in *'Ethnic identity and inequalities in Britain: The dynamics of diversity'* by Dr Stephen Jivraj and Professor Ludi Simpson (published May 2015). The authors use the 2011 Census data to estimate the TFR for the Gypsy and traveller community as 2.75.

- <sup>2.13</sup> ORS have used our own historic survey data to investigate the fertility rates of Gypsy and Traveller women. The ORS data shows that on average Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFR's were not completed).
- <sup>2.14</sup> On this basis it is reasonable to infer an average of 3 children per woman during their lifetime, which is broadly consistent with the estimate of 2.75 children per woman derived from the 2011 Census. The 2021 Census data is fully consistent with these estimates, so no changes are required to the modelling, but the evidence that the TFR could be falling should be monitored over time.

## Death Rates

- <sup>2.15</sup> Although the above data implies an annual growth rate through births of about 2%, the death rate must also be considered. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) *'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative'*, University of Sheffield).
- <sup>2.16</sup> Therefore, our population growth modelling in 2013 ORS used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 Census (and also in ORS's own survey data).
- <sup>2.17</sup> Again, this data is fully consistent with the 2021 Census, which may be showing slight increases in life expectancy, but not sufficient to be inconsistent with the 2013 modelling.

## Modelling Outputs

- <sup>2.18</sup> If a TFR of 3 and an average life expectancy of 72 years are assumed for Gypsies and Travellers, then the ORS modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum.
- <sup>2.19</sup> If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.50% per annum. To generate an 'upper range' rate of population growth, ORS assumed an implausible TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.90% per annum.
- <sup>2.20</sup> Given the data from the 2021 Census, the figure of 1.25% net population growth appears to be consistent with around 2% of the population being born each year and deaths accounting for around a 0.75% reduction in population.

## Household Growth

- <sup>2.21</sup> In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller childless or single person households.

- <sup>2.22</sup> Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.25%-1.50% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households' form.
- <sup>2.23</sup> However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
- <sup>2.24</sup> Based on the 2011 and 2021 Census, the tables below compare the age of household representatives in all households in England with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general England population in 2021, 2.7% of household representatives are aged 16-24, compared with 7.4% in the Gypsy and Traveller population, which is consistent with ORS's survey data.
- <sup>2.25</sup> Interestingly, in 2011, 8.7% of all Gypsy and Traveller households were aged under 25 years, but this has fallen to 7.4% in 2021. This is in line with a fall in the general population from 3.6% to 2.7%, which implies households are forming at an older age. This in turn would mean that any population growth would convert to a lower household growth as the growing population forms households at an older age.

**Figure 2 – Age of Head of Household in 2011 (Source: UK Census of Population 2011)**

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

**Figure 3 – Age of Head of Household in 2021 (Source: UK Census of Population 2021)**

Age of Household Representative	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Age 24 and under	608,361	2.7%	1,537	7.4%
Age 25 to 34	3,067,607	13.7%	4,278	20.6%
Age 35 to 49	5,886,110	26.2%	6,790	32.8%
Age 50 to 64	6,470,425	28.8%	5,318	25.7%
Age 65 and over	6,427,165	28.6%	2,807	13.5%
<b>Total</b>	<b>22,459,668</b>	<b>100%</b>	<b>20,730</b>	<b>100%</b>

- <sup>2.26</sup> The following tables shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents and fewer couples without children, amongst Gypsies and Travellers children. This was the case in both 2011 and 2021.

**Figure 4 – Household Type in 2011 (Source: UK Census of Population 2011)**

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no dependent children	7,024,688	31.8%	3,167	16.3%
Couple with dependent children	4,266,670	19.3%	3,683	18.9%
Lone parent with dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
<b>Total</b>	<b>22,063,368</b>	<b>100%</b>	<b>19,458</b>	<b>100%</b>

**Figure 5 – Household Type in 2021 (Source: UK Census of Population 2021)**

Household Type	Households - England	% Households - England	Households – Gypsies and Travellers	% Households – Gypsies and Travellers
Single person	6,964,704	30.3%	6,264	28.8%
Couple with no dependent children	7,806,819	34.0%	4,411	20.3%
Couple with dependent children	4,662,429	20.3%	4,500	20.7%
Lone parent with dependent children	1,773,926	7.7%	4,634	21.3%
Lone parent: All children non-dependent	1,058,017	4.6%	1,269	5.8%
Other households	725,107	3.2%	689	3.2%
<b>Total</b>	<b>22,991,002</b>	<b>100%</b>	<b>21,767</b>	<b>100%</b>

- <sup>2.27</sup> The key point, though, is that since 21% of Gypsy and Traveller households are lone parents with dependent children, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates.
- <sup>2.28</sup> While there are differences with the general population, a 1.25%-1.50% per annum Gypsy and Traveller population growth rate is likely to lead to a household growth rate of 1.25%-1.50% per annum.

### 3. CONCLUSIONS

- 3.1 The best available evidence suggests that the net annual Gypsy and Traveller household growth rate across England is 1.50% per annum. This figure was originally derived from the 2011 UK Census of Population and ORS's own survey but is also fully consistent with the 2021 UK Census of Population.
- 3.2 However, whilst a national rate of 1.50% can be demonstrated, this should be adjusted accordingly to establish local rates based on the demographic breakdown of the population at a local authority level.
- 3.3 Evidence from previous GTAA studies completed by ORS suggest that locally derived rates can vary from 0.50% to 2.75% depending on the number of children aged under 18 in the local Traveller population.
- 3.4 In addition, in certain circumstances where the numbers of households and children are higher or lower than national data has identified, or the population age structure is skewed by certain age groups, it may not be appropriate to apply a percentage rate for new household formation.
- 3.5 In these cases, a judgement should be made on likely new household formation based on the age and gender of the children identified in local household interviews. This should be based on the assumption that 50% of households likely to form will stay in any given area and that 50% will pair up and move to another area, while still considering the impact of dissolution. This is based on evidence from over 170 GTAA's that ORS have completed across England and Wales involving over 7,000 household interviews.

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## **Gypsy, Traveller and Travelling Show People Topic Paper (August 2025)**

### **1 Introduction**

- 1.0 Three Rivers District Council is preparing a new Local Plan, which will guide development up to 2041. In order to explain and support many of the themes in the emerging Local Plan, the Council will produce a number of topic papers, which present background information and evidence to set the scene for discussion and engagement.
- 1.1 The topic papers are intended to be 'living' documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement. The topic papers do not contain any policies, proposals, or site allocations.
- 1.2 A key element of the emerging Local Plan is to allocate sites for different uses where a need has been demonstrated, including for gypsy and traveller pitches, and travelling showperson plots, as required by national policy.
- 1.3 This topic paper will discuss the policy context from a national and local perspective and will provide a summary of the findings of the December 2024 Gypsy and Traveller Accommodation Assessment (December 2024) and the update to the GTAA following the change in definition of a gypsy and traveller.

### **2 Policy Context**

#### **National Planning Policy Framework**

- 2.0 The National Planning Policy Framework (NPPF) published in December 2024 sets out the Government's planning policies for England and how these should be applied. It provides a framework within which Local plans must be produced.
- 2.1 As set out in paragraph 11 of the NPPF, plans should apply a presumption in favour of sustainable development. For plan-making this means that:
  - a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
    - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 2.2 Paragraph 63 of the National Planning Policy Framework (NPPF) sets out that “*within this context of establishing need, the size, type and tenure of housing needed for*

*different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children ;older people (including those who require retirement housing, housing with-care and care homes); students; people with disabilities; service families; **travellers**<sup>27</sup>; people who rent their homes and people wishing to commission or build their own homes”.*

- 2.3 Footnote 27 within Paragraph 63 of the NPPF sets out that “*Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document*”. The GTAA summarises that in this policy context, the needs of households that meet the planning definition of gypsy and traveller should be assessed under the PPTS and that the needs of households that are not found to meet the planning definition should be assessed as part of the wider housing needs of an area.

### **Planning Policy for Traveller Sites (PPTS)**

- 2.4 Planning Policy for Traveller Sites sets out the Government’s planning policy for traveller sites and should be read in conjunction with the National Planning Policy Framework.

- 2.5 Policy A of the PPTS relates to using evidence to plan positively and manage development. Paragraph 7 sets out that in assembling the evidence base necessary to support their planning approach, local planning authorities should:

*a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups);*

*b) cooperate with travellers, their representative bodies and local support groups; other local authorities and relevant interest groups to prepare and maintain an up- to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities; and*

*c) use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.*

- 2.6 Policy B of the PPTS relates to planning for traveller sites in a plan-making context. Paragraph 9 sets out that:

*“Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities”.*

- 2.7 Paragraph 10 sets out that when producing their Local Plan, local planning authorities should:

*a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets;*

*b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;*

*c) consider production of joint development plans that set targets on a cross authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries);*

*d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and*

*e) protect local amenity and environment*

- 2.8 Paragraph 11 states “*criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community*”.
- 2.9 Policy F, Paragraph 19, states that “*Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. Local planning authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical*”.

### **Local Context**

- 2.10 Three Rivers' Current Development Plan
- 2.11 Three Rivers District Council adopted the “Core Strategy” on 17<sup>th</sup> October 2011 and this document forms part of the Local Development Framework. As the Council's Core Strategy was adopted in 2011 it is considered out-of-date (over 5 years from adoption). Policy CP5 (Gypsy and Traveller Provision) relates specifically to gypsies and travellers. This policy is a criteria-based policy used for considering planning applications for sites for gypsies and travellers and travelling showpeople.
- 2.12 The Development Management Policies Local Development Document (DMPLDD) was adopted on 26<sup>th</sup> July 2013. This document sets out the criteria used to assess planning applications in the District. It supports the implementation of the Core Strategy as part of the wider Development Plan. There are no specific gypsy or traveller policies within this document.
- 2.13 The Site Allocations Local Development Document (SALDD) was adopted on 25<sup>th</sup> November 2014. It supports the delivery of the Core Strategy by allocating specific sites that meet needs for housing, employment, education, shopping and open spaces in Three Rivers District. There are no specific gypsy or traveller policies or site allocations within this document.
- 2.14 Three Rivers' Emerging Local Plan
- 2.15 The Council have undertaken the following consultations with regards to its emerging Local Plan:
- Local Plan ‘Issues & Options and Call for Sites Consultation Document’, July 2017

- Local Plan 'Potential Sites Consultation', October 2018
- Local Plan 'Preferred Policy Options' (Part 1) and 'Sites for Potential Allocation (Part 2)' Regulation 18 Consultation, June 2021
- Local Plan 'Additional Sites for Potential Allocation' (Part 3) Regulation 18 Consultation, January 2023
- Local Plan 'Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land' (Part 4) Regulation 18 Consultation, October 2023
- Following a call for sites undertaken from 22<sup>nd</sup> January – 19<sup>th</sup> February 2025, a further Regulation 18 Consultation (Part 5) on newly submitted sites and new policies commenced on 16<sup>th</sup> July 2025 and will end on 31<sup>st</sup> August 2025.

2.16 The emerging Local Plan draft Policy "Provision for Gypsies, Travellers and Travelling Showpeople" is a criteria based policy, similar to the current Local Plan policy for gypsies and travellers.

#### 2.17 Neighbouring Local Plans

2.18 The other south-west Hertfordshire authorities and other adjoining authorities (outside of south-west Hertfordshire) are at different stages of the Local Plan process. A summary of these different stages can be seen below with reference to their approaches to meeting their gypsy and traveller needs.

#### **Watford Borough Council:**

2.19 The Watford Local Plan was adopted on 17<sup>th</sup> October 2022. In respect of Gypsy and Traveller pitches, the plan sets out that just two pitches are needed for the plan period up to 2036 and a small site has been allocated for this.

#### **St Albans City and District Council:**

2.20 The St. Albans City & District Local Plan was submitted to the Secretary of State for Independent Examination on 29 November 2024. They undertook a specific Call for Sites for Gypsies and Travellers in July 2024. The GTAA for St Albans City and District Council identified a need to plan for 80 pitches for those households who met the planning definition (under the 2023 NPPF definition). 2 sites were identified to supply around 40 pitches (which broadly meets their 5-year need), and half of the total need arising from those who meet the planning definition. St Albans' submitted plan includes a criteria-based policy for the undetermined Gypsy and Traveller sites and pitches that don't meet the planning definition. In terms of travelling showpeople, the GTAA identified a need for 7 plots for households that met the planning definition. It is important to note that St Albans City and District Council submitted their plan for examination under the 2023 NPPF (and superseded definition of a traveller defined in the PTTS), so their need (arising from households who meet the planning definition) has likely increased since submission.

#### **Dacorum Borough Council:**

2.21 Dacorum Borough Council submitted their Local Plan for examination in March 2025. The GTAA identified a need to plan for 20 pitches for those households who met the planning definition (under the 2023 NPPF definition). Dacorum have taken a mixed approach to their allocation of sites. Their allocated sites include 13 pitches across

two strategic sized housing developments and one site solely for gypsies and travellers (8 pitches), totalling 20 pitches overall, which meets their identified need (under the 2023 NPPF definition). A criteria-based policy is also in place, to account for the undetermined Gypsy and Traveller sites and pitches that don't meet the planning definition. In terms of travelling showpeople, the GTAA identified a need for 1 plot for households that met the planning definition. It is important to note that Dacorum Borough Council submitted their plan for examination under the 2023 NPPF (and superseded definition of a traveller defined in the PTTS), so their need (arising from households who meet the planning definition) has likely increased since submission.

**Hertsmere Borough Council:**

- 2.22 The most recent Regulation 18 Consultation took place between May and June 2024. The most recent Gypsy and Traveller Needs Assessment was in 2017, so it will require updating, but their 2021 'set aside' Local Plan (the last Regulation 18 consultation with full policies), allows for 30 pitches in the policy, against the 27 identified in 2017. This is provided mostly via strategic site provision with housing sites (24) and 3 as an extension of an existing site. There is also a criteria-based policy for further small-scale provision.

**London Borough of Harrow:**

- 2.23 The London Borough of Harrow submitted their plan for examination in February 2025. The Local Plan sets out a need of 12 pitches and identifies the extension of an existing site. There is also a criteria-based policy.

**London Borough of Hillingdon:**

- 2.24 Hillingdon adopted their most recent Local Plan in 2020. That document identifies only 2 pitches were required and they could be provided at their council run site. There was also a criteria-based policy alongside it, for any further applications. The authority went out for a consultation as part of their plan review last year, but this was only an early-stage regulation 18, asking for high-level views. It is likely that the provision will need to increase compared to their need set out in their currently adopted Local Plan.

**Buckinghamshire Council:**

- 2.25 According to their website, Buckinghamshire Council are at an early stage of their plan-making process. Buckinghamshire Council have undertaken a Call for Sites exercise in spring 2025, which will inform their Regulation 18 consultation. There is no recent/relevant information on Gypsy and Traveller need.

**Summary:**

- 2.26 In summary, neighbouring local authorities are employing a range of different methods in order to meet identified need, and often a combination of methods. The four approaches outlined above can be categorised as a criteria-based policy approach, extension of existing sites, entirely new gypsy and traveller sites, or allocated parts of strategic general needs housing sites (as highlighted in PPTS guidance above). Given the scale of need identified in Three Rivers recently, it is likely that a combination of approaches may be required.

### **3      Evidence Base**

3.0      A Gypsy and Traveller Accommodation Assessment (GTAA) is an evidence study which can be used to aid the implementation of Local Plan Policies and, where appropriate, the provision of new gypsy and traveller pitches and travelling showpeople plots to cover the Council's Local Plan period and the 15-year requirements set out in Planning Policy for Traveller Sites (PPTS).

#### **3.1      Gypsy and Traveller Accommodation Assessment (December 2024)**

3.1.0      In June 2024, the Council commissioned Opinion Research Services (ORS) to undertake a Gypsy and Traveller Accommodation Assessment to provide a robust assessment of current and future need for gypsy, traveller and travelling showpeople accommodation within the District. This was published onto the Three Rivers website following agreement at a Local Plan Sub-Committee in March 2025. A summary of the findings can be seen below.

##### **3.1.1      Pitch Needs – Gypsies and Travellers**

3.1.2      The need of 41 pitches arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites).

3.1.3      The need of 5 pitches arising from households with undetermined need will be met through criteria-based policies.

3.1.4      The need of 3 pitches arising from households who do not meet the planning definition will be met as a part of general housing need, through separate Local Plan Policies

##### **3.1.5      Plot Needs – Travelling Showpeople**

3.1.6      The need of 6 plots arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites).

3.1.7      The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.

##### **3.1.8      Transit Needs**

3.1.9      Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), the GTAA concludes that there is not a need for a formal public transit site in Three Rivers, however, this position should continue to be reviewed.

##### **3.1.10      Update to December 2024 GTAA**

3.1.11      However, during the final drafting of the GTAA in December 2024, the planning definition of a traveller (Annex 1 of the PPTS) expanded to include "all other persons with a cultural tradition of nomadism or living in a caravan". As set out in a note in the GTAA, because of this amended definition, an updated version of the GTAA report (dated July 2025) has been prepared that reflects the changes in the PPTS and any planning permissions granted in the intermediary period. Further details of this can be seen below.

## 3.2 Gypsy and Traveller Accommodation Assessment (July 2025)

### 3.2.0 Pitch Needs – Gypsies and Travellers

3.2.1 Figure 1 below sets out the overall identified need for gypsy and traveller pitches within the District.

Status	2025 – 2041
Need from households who meet the Planning Definition	37
Undetermined	4
<b>TOTAL</b>	<b>41</b>

Figure 1. Identified need for gypsy and traveller pitches within the District.

3.2.2 Figure 2 below sets out the need for gypsy and traveller pitches by year periods.

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	21	1
6 – 10	2030 – 34	5	1
11 – 15	2035 – 39	7	1
16 – 20	2040 – 41	4	1
<b>0 – 20</b>	<b>2025 – 41</b>	<b>37</b>	<b>4</b>

Figure 2. Need for gypsy and traveller pitches by year periods

3.2.3 There is a need for **37 pitches** emerging from the 56 households that met the 2024 PPTS planning definition. This is made up of 14 pitches for concealed/doubled-up/over-crowded households; 4 pitches from a 5-year need from teenage children; 3 pitches from in-migration/roadside; and 16 pitches from new household formation, using a formation rate of 1.7%. The need of 37 pitches arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites).

3.2.4 There is a need for **4 pitches** emerging from the 3 undetermined households. This is made up of a modelled need for 1 pitch from concealed/doubled-up/over-crowded households or single adults and 3 pitches from new household formation, using the ORS national formation rate of 1.50%. The need of 4 pitches arising from households with undetermined need will be met through criteria-based policies.

### 3.2.5 Plot Needs – Travelling Showpeople

3.2.6 Figure 3 below sets out the overall identified need for travelling showpeople plots within the District.

Status	2025 – 2041
Need from households who meet the Planning Definition	6
Undetermined	10
<b>TOTAL</b>	<b>16</b>

Figure 3. Identified need for travelling showpeople plots within the District

3.2.7 Figure 4 below sets out the need for travelling showpeople (those who meet the planning definition) plots by year periods.

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	6	5
6 – 10	2030 – 34	0	2
11 – 15	2035 – 39	0	2
16 – 20	2040 – 41	0	1
<b>0 – 20</b>	<b>2025 – 41</b>	<b>6</b>	<b>10</b>

Figure 4. Need for travelling showpeople plots by year periods

- 3.2.8 There is a need for **6 plots** emerging from the 24 households that met the 2024 PPTS planning definition. This is made up of 4 plots from concealed/doubled-up/over-crowded households; and 2 plots from a 5-year need from teenage children. The need of 6 plots arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites).
- 3.2.9 There is a need for **10 plots** emerging from the 16 undetermined households. This is made up of a modelled need for 3 plots from concealed/doubled-up/over-crowded households or single adults; a need for 2 plots from movement from bricks and mortar; and 5 plots from new household formation, using the ORS national formation rate of 1.50%. The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.
- 3.2.10 Transit Provision
- 3.2.11 Due to historic low numbers of unauthorised encampments, and the existence of public transit pitches in other districts of Hertfordshire (Hertsmere), the GTAA concludes that there is not a need for a formal public transit site in Three Rivers, however, this position should continue to be reviewed.
- 3.2.12 Five-Year Need
- 3.2.13 Five-year need and future need from households that meet the planning definition (both known and undetermined) will need to be addressed through a Gypsy and Traveller Local Plan Policy through a combination of site allocations and through a Criteria-Based Policy as required by the PPTS.
- 3.2.14 The reason for a high level of need being identified within the first five years for gypsy and travellers is that investigations found that there were significant amounts of doubled-up households and teenagers in need (identified during the household interviews), plus some displaced in-migration.
- 3.2.15 Meeting Need
- 3.2.16 With regards to gypsy and travellers, the GTAA concludes that for need arising from private sites *“the Council will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been identified the Council should also consider the regularisation of sites with temporary planning permission and of unauthorised sites”*.
- 3.2.17 We are currently exploring different options, including engaging with GATE Herts to identify ways to meet the need set out in the GTAA.
- 3.2.18 With regards to travelling showpeople, the GTAA concludes that for need arising from private sites *“the Council will need to consider the expansion or intensification of*



*these yards, or to address need through new yard/plot allocations. Where they have been identified the Council should also consider the regularisation of yards with temporary planning permission and of unauthorised yards”.*

- 3.2.19 The outcomes of this study will supersede the outcomes of the previous GTAA's for Three Rivers Council, which were undertaken in February 2017 and December 2024.

#### **4 Call for Sites**

- 4.0 Despite previous call for sites consultations being open for all types of housing, these have not resulted in any sites being put forward for specifically gypsy and traveller pitches or travelling showpeople plots.
- 4.1 Given the significant identified need for both gypsy and travellers and travelling showpeople, and the relatively limited number of private sites within the District (which may have limited scope for expansion), it was deemed necessary to undertake a call for sites exercise for solely gypsy and travelling showpeople sites, to help identify any potential additional sites, in addition to the existing sites.
- 4.2 The gypsy, traveller and travelling showpeople call for sites period started on Friday 4 July and ends at 5pm on Monday 4 August 2025. At the time of writing this topic paper the call for sites was still underway, however, Members will be verbally updated of any submissions at the Local Plan Sub-Committee on 7<sup>th</sup> August 2025, which is after the call for sites exercise ends.
- 4.3 It is not expected that there will be much response to a call for sites, so any subsequent Regulation 18 consultation would involve minimal officer input or time delay.

#### **5 Conclusions**

- 5.0 As set out in national policy, Local Planning Authorities are required to plan for the housing needs of gypsies and travelling showpeople.
- 5.1 In terms of gypsies and travellers, the need of 37 pitches arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 4 pitches arising from households with undetermined need will be met through criteria-based policies.
- 5.2 In terms of travelling showpeople, the need of 6 plots arising from those households who meet the planning definition is required to be met directly from site allocations (either by allocating new sites or expanding existing sites). The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.
- 5.3 Similar to neighbouring authorities, there are a range of different methods in order to meet identified need, and often a combination of methods is most effective. The approaches can be categorised as a criteria-based policy approach, extension of existing sites, allocating entirely new gypsy and traveller sites, or allocating parts of strategic general needs housing sites. Given the scale of need identified in Three Rivers recently, it is likely that a combination of approaches may be required.

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### Provision for Gypsies, Travellers and Travelling Showpeople

1.1 Gypsies, Travellers and Travelling Showpeople have particular accommodation needs that require additional consideration. To ensure that members of these communities are able to access decent and appropriate housing with access to services including health and education, the Council must make provision for accommodation to meet identified needs.

#### Provision for Gypsies, Travellers and Travelling Showpeople

- 1) When considering planning applications for sites for Gypsies and Travellers or Travelling Showpeople, a criteria based approach will be used. The following criteria will be taken into account:
  - a) Avoid areas at risk from all sources of flooding
  - b) Avoid causing an adverse impact on areas of recognised wildlife, heritage or landscape importance, and on the openness of the Green Belt;
  - c) Be in or near existing settlements with access by foot and/ or public transport to local services, including shops, schools and healthcare;
  - d) Be well located to the highway network, with safe and convenient vehicular and pedestrian access to the site;
  - e) Provide adequate on-site facilities for parking, storage, play and residential amenity;
  - f) Provide adequate levels of privacy and residential amenities for occupiers and not be detrimental to the amenities of nearby occupiers; and
  - g) The circumstances of the applicant and their need for pitches on the application site.
- 2) Existing Gypsy, Traveller and Travelling Showpeople sites/yards will be safeguarded unless there is robust and justified evidence that there is no longer a need for their retention.

#### **Reasoned Justification:**

1.2 The NPPF sets out that within the context of establishing need (housing), the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies and specifically refers to travellers as one of these groups.

1.3 Planning Policy for Traveller Sites (PPTS) sets out the Government's planning policy for traveller sites and should be read in conjunction with the National Planning Policy Framework. The PPTS states that the Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

1.4 The Council will seek to meet identified needs on suitable sites in sustainable locations and to maintain a five-year supply of deliverable pitches/plots taking into account the findings of the Council's Gypsy and Traveller Accommodation Assessment (July 2025) and any subsequent updates. All the identified Gypsy, Traveller and Travelling Showpeople Sites within the District will be 'safeguarded' to ensure that the permitted use as a traveller site is not lost through the grant of any subsequent planning permission whilst there remains a need for sites.

## Provision for Gypsies, Travellers and Travelling Showpeople

1.5 The table below sets out the identified need for gypsy and traveller pitches within the District by year periods. There is a need of 37 pitches arising from those households who meet the planning definition and a need of 4 pitches arising from households with undetermined need.

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	21	1
6 – 10	2030 – 34	5	1
11 – 15	2035 – 39	7	1
16 – 20	2040 – 41	4	1
<b>0 – 20</b>	<b>2025 – 41</b>	<b>37</b>	<b>4</b>

1.6 The table below sets out the identified need for travelling showpeople plots within the District by year periods. There is a need of 6 plots arising from those households who meet the planning definition and a need of 10 plots arising from households with undetermined need.

Year Period	Dates	PPTS Need	Undetermined Need
0 – 5	2025 – 29	6	5
6 – 10	2030 – 34	0	2
11 – 15	2035 – 39	0	2
16 – 20	2040 – 41	0	1
<b>0 – 20</b>	<b>2025 – 41</b>	<b>6</b>	<b>10</b>

1.7 The GTAA has not identified the requirement for transit sites within the District, as such we have not planned for such a facility at the current time, although will keep this approach under review as suggested by the GTAA.

1.8 There are a range of different methods to meet identified need, and often a combination of methods is often most effective. The approaches can be categorised as a criteria-based policy approach, extension of existing sites, allocating entirely new gypsy and traveller sites, or allocating parts of strategic general needs housing sites. A combination of approaches will be utilised in order to meet the need identified within the GTAA.

Three Rivers District Council

# Sub Committee Report

7 August 2025

**PART I**

**Green Belt Topic Paper  
(DoF)**

**1 Summary**

- 1.1 This report provides an overview of the draft Green Belt Topic Paper (Appendix 1) prepared to assist with the formulation of the Local Plan.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to note the contents of this report and the associated Topic Paper.

**2 Background**

- 2.1 The Green Belt Topic Paper (Appendix 1) provides a holistic overview of the important subject of Green Belt, an integral element of the emerging Local Plan, including summarising past local Green Belt evidence studies as well as discussing current national policy and the inter-relationship between Green Belt policy and provision of housing (and other forms of growth) within the District.
- 2.2 Over three quarters (76%) of the District is designated as Green Belt. The remainder of the District is made up by the existing urban area consisting of small and medium sized settlements, with relatively little development potential within the urban area.
- 2.3 The NPPF sets out that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation and updating of Local Plans. The Council's Local Housing Needs Assessment (2024) analyses the needs for different types and tenures of housing, highlighting an acute need for affordable housing across the District. This need, together with the needs for future generations, specialist accommodation and the delivery of much needed infrastructure, is considered to constitute the exceptional circumstances required for alteration of Green Belt boundaries.

**3 Summary of Green Belt Reviews**

Stage 1 Green Belt Study

- 3.1 A Stage 1 Green Belt study (August 2017) was undertaken jointly with Watford which strategically reviewed the Green Belt purposes, looking at 83 strategic parcels. It also considered the character and role of villages within the Green Belt to assess the suitability of continued and potential in-setting of villages within the Green Belt.
- 3.2 The Stage 1 study found the District's Green Belt to be fulfilling its intended strategic purpose, that is maintaining a sense of openness through its permanence and application of development restraint. There were only 4 parcels that had a limited contribution to the overall purpose but many more had more than one significant contribution, which according to the report creates a complex picture on the context of growth and removal of Green Belt land at a strategic level.

### Stage 2 Green Belt Study

- 3.3 The Stage 2 Green Belt study (October 2019) considered the effect of releasing Green Belt land for development purposes. A total of 152 parcels of land were assessed.
- 3.4 The Stage 2 study involved an assessment of the potential harm to the Green Belt associated with the release of specific areas of land. The harm assessment considered the extent to which the release of different areas of land would reduce contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the strength of the adjacent Green Belt. Ratings and supporting analysis were provided in relation to each assessed Green Belt purpose, and considered in combination to arrive at a single overall harm rating. The harm rating was expressed via a sliding scale comprising of the following categories; very high, high, moderate-high, moderate, low moderate, low and very low.
- 3.5 In terms of overall harm, there were no parcels found to have very low levels of harm associated with them, and only 8 parcels or 2% being of low harm. The largest area of Green Belt by category was moderate high, which made up 31.8% of the total area, with high making up 27% of the total Green Belt area. The report concludes that there are other factors that should be considered (not just overall Green Belt harm), such as overall sustainability (as some higher harm Green Belt may be located in sustainable locations) and consideration of potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt.

### Stage 3 Green Belt Study

- 3.6 The Stage 3 Green Belt study analysed variations in harm to Green Belt purposes that could result from the creation of a new inset settlement, distinct from any existing inset areas.
- 3.7 In order to be relatively self-sustaining, a figure of a minimum of 3,000 dwellings was chosen for a new settlement, with a 100ha minimum search size. Across the district, seven areas were identified for a potential new settlement. However, the 100ha releases of land in all the search areas were found to cause high or very high harm in all cases and therefore the creation of a new settlement was not considered to be an appropriate growth strategy.

### Ongoing Green Belt Review

- 3.8 Following the update to the NPPF in December 2024, we are in the process of undertaking a further Green Belt Review. This Green Belt review will identify Grey Belt land within the District and will provide evidence as to whether altering Green Belt boundaries (as a result of proposed development) would “fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”, as set out in paragraph 146 of the NPPF.
- 3.9 At the time of writing, the findings of the ongoing Green Belt review have not been made available to officers, however, officers will fully update Members of the Local Plan Sub Committee at the earliest opportunity. Members will also be briefed during the Part 2 section of the 7<sup>th</sup> August Local Plan Sub-Committee.

## **4 Policy/Budget Reference and Implications**

4.1 The recommendations in this report are within the Council's agreed policy and budgets.

5 **Financial, Legal, Staffing, Equal Opportunities, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications**

5.1 None specific.

6 **Recommendation**

6.1 That the Local Plan Sub-Committee:

- Note the contents of this report and the associated Topic Paper.

7 **Background Papers**

National Planning Policy Framework (2024)

Planning Practice Guidance (2024)

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

8 **Appendices**

Appendix 1 – Draft Green Belt Topic Paper

Report prepared by: Aaron Roberts, Senior Planning Officer





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## Green Belt Topic Paper (August 2025)

### 1 Introduction

- 1.1 Three Rivers District Council is preparing a new Local Plan, which will guide development up to 2041. To explain and support many of the themes in the emerging Local Plan, the Council will produce several topic papers, which present background information and evidence to set the scene for discussion and engagement.
- 1.2 The topic papers are intended to be 'living' documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement. The topic papers do not contain any policies, proposals, or site allocations.
- 1.3 This Green Belt Topic Paper aims to gather and summarise local Green Belt evidence and serve as a starting point for a review of the evolution of previous policies and growth strategies in relation to the Green Belt, tied to the progression of national policy and growth requirements within the context of the district. It also looks at the latest national policy and how we might interpret that going forward, as well as summarising the circumstances and interpretation of growth requirements in neighbouring boroughs and districts, and Neighbourhood Plans covering the district.

### 2 Policy Context

#### National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) published in December 2024 sets out the Government's planning policies for England and how these should be applied. It provides a framework within which Local plans must be produced.
- 2.1 Paragraphs 145-149 of the NPPF relate to altering Green Belt boundaries. Paragraph 145 states that *"once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans..."*.
- 2.2 Following on from this, paragraph 146 states:  
  
*"Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan"*.
- 2.3 These exceptional circumstances are only engaged if the plan can demonstrate it has fully considered all other reasonable options for development, as set out in paragraph 147. For this, the plan needs to show that it:
  - a) makes as much use as possible of suitable brownfield sites and underutilised land;
  - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in

*minimum density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

2.4 Additionally, paragraph 148 states:

*“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework....”.*

2.5 Grey belt is a new concept introduced through the update to the NPPF in December 2024. It refers to Green Belt that is either previously developed land or land that does not strongly contribute to Green Belt purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another, or (d) to preserve the setting and special character of historic towns. This leaves two of the five Green Belt purposes not being considered when grey belt is being identified; purposes (c) to assist in safeguarding the countryside from encroachment and (e) to assist in urban regeneration.

2.6 Paragraph 149 sets out the considerations a local authority must have when defining those Green Belt boundaries in terms of sustainability, necessity, and permanence, both in terms of using recognisable features, but making enough land available so not to require further alteration at the end of the plan period.

2.7 In relation to affordable housing within the Green Belt, paragraph 67 of the NPPF states:

*“As part of the ‘Golden Rules’ for Green Belt development set out in paragraphs 156-157 of this framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:*

*a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and*

*b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability)”.*

2.8 As alluded to in the policy above, the ‘golden rules’ are a new requirement designed to offset the impact of lowering the bar for Green Belt release. Paragraphs 156 and 157 set this out in further detail and scope. In terms of affordable housing, the policy sets an interim measure that allows for a 15% uplift on current local affordable housing policies, with a 50% cap, until local policy is updated in paragraph 157 and other requirements set out in paragraph 156 are the requirements to provide necessary improvements to local or national infrastructure and *‘the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces’.*

## **Planning Practice Guidance (PPG)**

### Grey Belt Land

- 2.9 The latest update to the PPG provides further specific advice on the size of parcels and their subdivision and how assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes.
- 2.10 Paragraph 005 sets out guidance on how to assess purposes A, B and D, which forms the basis of the judgement of whether land constitutes grey belt. These purposes are Purpose A - to check the unrestricted sprawl of large built-up areas, Purpose B - to prevent neighbouring towns merging into one another and Purpose D - to preserve the setting and special character of historic towns. Examples of illustrative features that make a 'strong', 'moderate' or 'weak' contributions to the purposes are provided. The guidance also sets out that villages are not included in the assessment of purposes A and B.
- 2.11 The NPPF requirement to release Green Belt in full to meet an area's development needs unless the release of Green Belt would fundamentally undermine the purposes of the Green Belt when taken as a whole, across the plan area, means it is now more difficult to protect Green Belt from development. Paragraph 008 considers this, setting out that *'in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'*.

### Identifying sustainable locations

- 2.12 Paragraph 011 sets out the consideration of sustainable locations when reviewing Green Belt boundaries and that 'the need to promote sustainable patterns of development should determine whether a site's location would be appropriate for the kind of development proposed.' Similarly, grey belt land should not be treated any differently when it comes to appropriate locations. If grey belt land is in a location that is not, or cannot be made sustainable, then it would be inappropriate for that type of development.

### Potential impact of development on the openness of the Green Belt

- 2.13 Finally, paragraphs 013 and 014 deal with the openness of the Green Belt and how it should be considered. This is a judgement based on circumstances and subsequently there are guiding principles that need to be taken account of. These include:
- 'openness' is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume
  - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness
  - the degree of activity likely to be generated, such as traffic generation'
- 2.14 Paragraph 014 sets out how openness can be considered when it is not inappropriate development in the Green Belt, in the case of previously developed land or grey belt. The tests of impacts to openness or the purposes are considered to have been addressed and therefore 'very special circumstances' are not required to be met.

### **3 Local Context**

#### **South-West Hertfordshire Joint Strategic Plan**

- 3.1 The South-West Hertfordshire Joint Strategic Plan (JSP) will cover the area covered by the South-West Hertfordshire partner authorities. These are Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council, Watford Borough Council and Three Rivers District Council.
- 3.2 As set out on its website, the South-West Hertfordshire Joint Strategic Plan 'will provide a long-term blueprint for the south-west Hertfordshire area to 2050. It will consider and address issues that cross council boundaries and will set out a strategic vision for the area. It will also help guide future Local Plans and strategies by setting out high level policies on topics such as climate change, net zero carbon, infrastructure provision, environmental protection, employment and housing. Once approved, the Joint Strategic Plan will provide a coordinated overarching framework that will guide local decision making on planning matters'.
- 3.3 In the summer of 2022, a formal public consultation (Regulation 18) was carried out. In August 2023, a "shared vision" and set of principles used to inform progress of the JSP was published. The next stages of the JSP involve consultation on options for the scale and pattern of growth.
- 3.4 The JSP will be producing a strategic Green Belt review for the whole of the South-West Hertfordshire area. This will effectively be a Stage 1 style review for the sub-region.

#### **Three Rivers' Current Development Plan**

- 3.5 Three Rivers District Council adopted the "Core Strategy" on 17<sup>th</sup> October 2011 and this document forms part of the Local Development Framework. As the Council's Core Strategy was adopted in 2011 it is considered out-of-date (over 5 years from adoption).
- 3.6 The Core Strategy set a target of 180 dwellings per annum between the plan period of 2001-2026. Between 2001-2018, the average number of new dwellings delivered each year was 207 (resulting in an over delivery of 460 dwellings), which exceeded the 180 target set out in the Core Strategy. At the time, the plan stated that approximately 25% of the housing was to be in the Green Belt.
- 3.7 However, by the time the Regulation 18 Part 1 and 2 Regulation consultations were published in 2021, Three Rivers' target was 630 dwellings per year, or 12,624 for the plan period, a three-and-a-half-fold increase on the 2011 targets. Subsequently, not only had the target increased dramatically, but available land outside of the Green Belt had reduced due to development exceeding the old local plan targets for a number of years.
- 3.8 Therefore, since then, and since numerous exercises to try and find more urban sites, fewer than 1,000 homes can be built on previously developed land outside of the Green Belt. The issue is only getting more acute with the new methodology set out by the government, who's formula increases the numbers of homes in unaffordable areas. The target has risen to 832 dwellings per annum or 13,312 dwellings across the plan period, under the new standard method.

### **Three Rivers' Emerging Local Plan**

- 3.9 The Council have undertaken the following consultations with regards to its emerging Local Plan and where relevant, the Green Belt approach has been summarised:

#### **Local Plan 'Issues & Options and Call for Sites Consultation Document', July 2017**

- 3.10 The growth approach taken in this consultation was based on the Strategic Housing Market Assessment (SHMA) undertaken in 2016. The findings of this report concluded that 514 dwellings per annum would be required, a significant increase on the 180 per annum local plan figure. In this context, officers chose to consult on several options, a low growth option, 20% below the OAN figure (411 dwellings) a moderate growth option in line with the OAN figure and high growth, which was 20% above (617 dwellings). Of the respondents, 18% supported the low growth, 41% the moderate growth and 41% high growth, with a low response rate. In the context of Green Belt release, it was acknowledged that some Green Belt release would be necessary for all options given the increased level of need when compared to the previous plan, but the Green Belt wasn't discussed further in this consultation.

#### **Local Plan 'Potential Sites Consultation', October 2018**

- 3.11 This consultation set out potential site options, including those within the Green Belt.

#### **3.12 Local Plan 'Preferred Policy Options' (Part 1) and 'Sites for Potential Allocation (Part 2)' Regulation 18 Consultation, June 2021**

- 3.13 The approach to this consultation was against the backdrop of the introduction of the standard method in 2018 and a Local Housing Needs Assessment (SHMA update). The standard method increased need to 615 dwellings per annum, which was effectively the same as the high growth option indicated in the previous consultation. The LHNA applied the standard method within their study and the figure further increased to 630 dwellings for the consultation.

#### **Local Plan 'Additional Sites for Potential Allocation' (Part 3) Regulation 18 Consultation, January 2023**

- 3.14 The 2021 consultation did not identify enough sites to meet the housing need, (1318 dwellings short) so further consultation on additional sites was undertaken.

#### **Local Plan 'Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land' (Part 4) Regulation 18 Consultation, October 2023**

- 3.15 The main reason for this consultation and lower growth approach, was in response to the Secretary of State's letter the previous year, that stated Green Belt removal was not a requirement to meet housing need. Although this was not explicitly set out in national policy, there were alterations to the 2023 NPPF that the calculation for setting out housing need under the standard method was now an 'advisory starting point' and paragraph 145 stated that local authorities may choose (but are not required to) review and alter Green Belt boundaries in the event that they cannot meet their housing need.
- 3.16 This was taken as justification to aim for a lower level of growth and would be primarily based on the level of harm of removing areas of Green Belt for development. Given

that less than 10% of the need could be achieved without Green Belt development, it was acknowledged that some Green Belt release would still be necessary.

- 3.17 The decision was to use the Stage 2 Green Belt Review as a basis for this and only remove areas of Green Belt with a harm rating of 'moderate' or below. This resulted in an objectively assessed need of 4852 homes, of which 2385 were to be built in the Green Belt. The standard method figure was 11,466 for 18 years period to 2041.

**Local Plan 'Newly Submitted Sites and New Policies' (Part 5) Regulation 18 Consultation, July 2025**

- 3.18 The current Regulation 18 consultation is seeking views on newly submitted sites as a result of a call for sites exercise undertaken earlier this year. The majority of the sites are within the Green Belt. The consultation is not relating to a specific growth strategy, rather seeking further information on the sites. The council has significant concerns about the majority of the sites and these are unlikely to come forward in the Local Plan.

**Current Position**

- 3.19 Following the publication of the updated NPPF in December 2024, it was agreed at Full Council that the low growth approach should be aborted as it would likely be found unsound by an inspector at examination. Members then agreed to pause the Local Plan process while further evidence work was undertaken. A new Local Development Scheme (LDS) was published in December 2024, which details that the Regulation 19 consultation is scheduled for February/March 2026 and submission to the Planning Inspectorate in April/May 2026.
- 3.20 As indicated previously, we are now required to provide for 832 dwellings per annum over a 16-year period, resulting in 13,312 dwellings. This is 1846 more than the previous standard method figure.

**New Green Belt Policy**

- 3.21 In terms of consultation on the Green Belt approach, the June 2021 Part 1 Regulation 18 consultation proposed a new Green Belt policy option. This was updated in the summer of 2024 and was taken to the October 2024 Local Plan Sub Committee. However, in December 2024 the NPPF (and subsequently the PPG) was updated with wide-ranging changes to Green Belt policy from both a plan-making and decision-making perspective.
- 3.22 Subsequently, we are revising our Green Belt policy again to take account of the changes to the NPPF, particularly regarding grey belt, updated exceptions to inappropriate development within the Green Belt and the Golden Rules for Green Belt sites.

**Neighbourhood Plans**

- 3.23 There are currently three adopted Neighbourhood Plans within the District (Croxley Green, Chorleywood and Batchworth). Two other Parish Councils (Sarratt and Abbots Langley) are also currently producing Neighbourhood Plans. In their current iterations, neither the adopted nor any of the emerging Neighbourhood Plans include specific site allocations for housing development. Whilst the three adopted Neighbourhood Plans contain policies aiming to protect the Green Belt and, in some cases, improve it, Neighbourhood Plans cannot amend nationally produced policy directly and make decisions on altering Green Belt boundaries. Neighbourhood



Plans' main tool for protecting green space is the designation of Local Green Spaces, which gives green spaces of community importance similar protection as the Green Belt, when meeting specific criteria.

### **Neighbouring Local Authority Local Plans**

- 3.24 The other south-west Hertfordshire authorities and other adjoining authorities (outside of south-west Hertfordshire) are at different stages of the Local Plan process. A summary of these different stages can be seen below:

#### Watford Borough Council:

- 3.25 The Watford Local Plan was adopted on 17<sup>th</sup> October 2022. The Plan sets out that "at least 13,328 net additional homes, equivalent to at least 784 new homes per year, will be delivered in Watford between 2021 and 2038". This met Watford's standard method requirement in full at the time. Watford is around 19% Green Belt and the vast majority of that is set to be preserved, by concentrating development into high density regeneration of their urban land, with the 'Core Strategic Development Area' taking 80% of their allocation. Only around 2Ha of land appears to be allocated within the Green Belt.

#### St Albans City and District Council:

- 3.26 The St. Albans City & District Local Plan was submitted to the Secretary of State for Independent Examination on 29 November 2024. The submitted Local Plan states that "*following the Government's required 'Standard Method' for calculating local housing need, the Council will identify and allocate land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024-31 March 2041*".

As the local authority submitted their plan within the transition period for meeting the new standard method target, the local authority is able to demonstrate that they are meeting the old standard method figure, but are committing to an early review of the plan. St Albans is 81% Green Belt, and although it does have some brownfield land, it will not be able to get close to delivering its target in these previously developed areas. The 'garden communities' that form urban extensions to Hemel Hempstead within St Albans District, will be taking approximately 30% of development, or 5,000 homes across three sites, with north St Albans taking more than 1,000 and north-east Harpenden and West Redbourn being other significant Green Belt sites of over 500 homes.

#### Dacorum Borough Council:

- 3.27 Dacorum Borough Council submitted their Local Plan to the Secretary of State for public examination in March 2025. The pre-submission version of the Plan sets out that "*Strategic Policy H1 (Delivering the Housing Strategy) sets a strategy that meets the standard method figure of 1,016 dwellings per annum in full through a mixture of site allocations, commitments and a windfall allowance*". However, like St Albans, they submitted their plan under the transitional arrangements period and will need to commit to an early review of the plan.
- 3.28 Although Dacorum has more brownfield land in Hemel Hempstead than most neighbouring authorities, it is still unable to meet its requirement without releasing Green Belt. The largest of the allocations is north of Hemel Hempstead, where 5000 homes will eventually be provided beyond the plan period (1500 within the current

period, not accounting for the early review) and 250ha of Green Belt land to be released. Other significant releases include East of Tring, with 83ha released from the Green Belt for 1400 homes, 36ha at Shendish Manor, Hemel for 500 homes and 30ha released at Polehanger Lane for around 750 dwellings with similar plans at Land South of Berkhamsted.

**Hertsmere Borough Council:**

- 3.29 The most recent Regulation 18 Consultation took place between May and June 2024. This Regulation 18 Consultation set out a target of delivering 9,396 dwellings, meeting just over 75% of the standard method figure which was in force at the time of publication of the consultation.
- 3.30 This strategy does not propose allocation of sites in areas of Green Belt that meet the purposes strongly, leading to a reduction in Green Belt being removed of around 300ha, equating to the 75% of the target figure (standard method) being proposed. It should be noted, however, that although the onus at this point was still strongly on meeting the need, this was before guidance was strengthened in terms of meeting the assessed need in December 2024.
- 3.31 The proposed release of Green Belt is predominantly through the new settlement in the countryside (Bowmans Cross) eventually providing 5000 new homes, with 2400 homes in the plan period. The only other 500 dwelling plus allocation is likely to be at Potters Bar Golf Course.

London Borough of Harrow:

- 3.32 The London Borough of Harrow submitted their Local Plan for examination at the end of February this year. The Plan “proposes to adopt a housing requirement/target of 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan”. As such, the Harrow Local Plan is planning to meet the relevant London Plan target at the time when it is submitted for examination. However, there is a risk that if the plan is not adopted by March 2026, that the housing target could rise to 2137 homes per annum.
- 3.33 Just over 20% of Harrow’s area is Green Belt. Aside from the redevelopment of the Royal Orthopaedic Hospital, providing a new rationalised modern hospital and approximately 500 homes, it is possible for them to meet their targets within the built up/previously developed area. This land would now meet the definition of previously developed land and grey belt under the new guidance, but the plan nonetheless argues that it sits under very special circumstances as enabling development for a new hospital. Clearly, if the target was to increase significantly, the release of Green Belt land would seem inevitable.

London Borough of Hillingdon:

- 3.34 The call for views consultation (Regulation 18) finished on Monday 24 June 2024. The Local Development Scheme (July 2024) sets out that the Regulation 19 Consultation will take place from March 2025 to April 2025, but there appears to be no further updates or consultation at this stage.
- 3.35 Prior to the most recent review, the Local Plan Part 2 in 2020, Hillingdon did not consider that major adjustments to the Green Belt boundary would be necessary for the plan period to accommodate required growth, although minor adjustments to the

Green Belt boundary were required. However, this was based on just 426 homes per year being needed. The London Plan in 2021 allocated 1083 homes per year for Hillingdon and although it is not currently clear what their detailed strategy for meeting this need is, it would be expected that this would require larger incursions into the Green Belt.

Buckinghamshire Council:

- 3.36 According to their website, Buckinghamshire Council are at an early stage of their plan-making process. Buckinghamshire Council have undertaken an early engagement questionnaire, vision and objectives consultation and a call for sites. The previous LDS set out that publication and submission will take place between January 2026 and August 2026. However, this has recently been updated, and they are currently in the plan preparation stage, with a Regulation 18 consultation indicated for September or October of this year.
- 3.37 In the context of the above authorities, it is important to note paragraph 62 of the NPPF which sets out that “in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. Duty to Co-operate meetings to discuss housing matters have been and will continue to be undertaken between Three Rivers and neighbouring areas.

#### **4 Current and Future Evidence Base**

##### **4.1 Stage 1 Green Belt Review**

- 4.1.0 A Stage 1 Green Belt Review (August 2017) was undertaken jointly with Watford which strategically reviewed Green Belt purposes, looking at 83 strategic parcels. It also considered the character and role of villages within the Green Belt to assess the suitability of continued and potential in-setting of villages within the Green Belt, as required by the NPPF.
- 4.1.1 The main areas of Green Belt within Three Rivers District was identified as ‘more remote’ open countryside to the west and north west of Rickmansworth and the M25, and the open countryside between Watford and Rickmansworth.
- 4.1.2 The purpose of the review was to determine the contribution that each parcel of land made to the Green Belt as a whole, initially categorised by ‘Significant contribution’, ‘Contribution’ and ‘Limited contribution’ against the five purposes set out in the NPPF.
- 4.1.3 Parcels were defined utilising Ordnance Survey maps following natural and man-made boundaries in the landscape, from streams and hedgerows to tracks and motorways. Parcels were generally more naturally finer grain towards settlement edges, due to a higher proliferation of boundary edges.
- 4.1.4 Assessments included such elements as land use, degree of enclosure or openness and relationship with the countryside, when considering the purposes of the Green Belt. There was no scoring or weighting associated with the assessment, so the work rested solely on the professional judgement of the consultant. Subsequently, a significant contribution in one category could lead to an overall significant contribution if that was its primary purpose, even if other categories only resulted in a limited score, however, ‘contribution’ scores across the board may only lead to an overall categorisation of that, as it would be its highest score.

- 4.1.5 There was also an assessment into whether existing villages should remain 'washed over' in the Green Belt, by virtue of their continued contribution to the Green Belt purposes, particularly in respect of maintaining openness. This was done by looking at such aspects as current density and layout and general character, including setting, topography and location. This was carried out on the villages of Heronsgate, Bedmond and Sarratt.
- 4.1.6 In terms of the results, the Green Belt was found to be fulfilling its intended strategic purpose, that is maintaining a sense of openness through its permanence and application of development restraint. There were only 4 parcels that had a limited contribution to the overall purpose but many more had more than one significant contribution, which according to the report, creates a complex picture on the context of growth and removal of Green Belt land at a strategic level.
- 4.1.7 Looking at the inset villages of Sarratt, Bedmond and Heronsgate, the report suggested that Sarratt and Heronsgate remained washed over, whereas Bedmond could be inset, to allow for some local development needs. Although Bedmond was described as a relatively small village, it is more densely developed, particularly towards the centre, limiting its relationship with the wider Green Belt. Heronsgate on the other hand, was 'notably' low density' blending into the countryside, particularly on its southern edge, and Sarratt was found to be of generally open character, with a large conservation area, including the village green, contributing to this.
- 4.2 Stage 2 Green Belt Review
- 4.2.0 A Stage 2 Green Belt assessment (October 2019) considered the effect of releasing Green Belt land for development purposes. A total of 152 parcels of land were assessed in this exercise, an indication of the finer grain approach for the stage 2 assessments. The assessment looked at the impact on three purposes as well as the relationship between settlement and countryside. Purpose 1 was the parcels relationship with the large built-up areas; Purpose 2 was the relationship with neighbouring towns, and 3 the relationship with the countryside. The ratings given were significant/relatively significant/moderate/relatively limited and limited or no impact.
- 4.2.1 Further steps were then taken in the Stage 2 assessment as it looked at the relative impact of releasing the parcels of Green Belt land for development on the integrity of the remaining Green Belt. This was done by looking at the current and future strength of the boundaries within the parcels and adjacent areas of Green Belt to see if the overall strength of the Green Belt would be weakened, and to what extent, although there were some cases where a hypothetical change in the boundary could result in a stronger boundary edge. These were categorised into four categories: significant/moderate/minor and no or negligible.
- 4.2.2 The third and final step was undertaken by combining steps one and two (the impact of release in terms of the purposes and impact of release on the wider Green Belt) and this is the 'harm' judgement. This was split into seven categories on a sliding scale; very high, high, moderate-high, moderate, low moderate, low and very low. This was an exercise in professional judgement in each case and the consultant considered how much weight should be attributed to each contributing element.
- 4.3 In terms of overall harm, there were no parcels found to have very low levels of harm associated with them, and only 8 parcels (or 2%) being of low harm. The largest area of Green Belt by category was moderate high, which made up 31.8% of the total area, with high not being far behind, making up 27% of the total Green Belt area. The report

does conclude in stating that while it would be tempting to dismiss all sites that are high or very high harm for example, there are other factors that come into play, such as the overall sustainability of the settlement that it is on the edge of, so decisions based solely on Green Belt strength would not be recommended.

- 4.4 The report also goes on to make a number of other recommendations in terms of how the local authority might mitigate Green Belt harm and minimise the releases required as well as recommending beneficial uses of green belt and how it can be improved, including the mechanisms for funding this, for example via S106 agreements.
- 4.5 **Stage 3 Green Belt Review**
- 4.6 Finally, in 2020, there was a further assessment of the Green Belt in order to analyse variations in harm to the green belt purposes that could result from the creation of new inset settlements, distinct from the current inset areas, such as entirely new settlements.
- 4.7 The report sets out initially to identify areas that could accommodate a new settlement, meeting housing and density requirements and assess variations in the harm to Green Belt purposes if this land was released for development. The findings are then presented, organised by search area.
- 4.8 In order to find sufficient sized sites, a number of parameters needed to be identified. This included minimum dwelling numbers and density, including space for infrastructure and open space. In order to be relatively self-sustaining, a figure of a minimum of 3,000 dwellings was chosen at 40 dph, with a 70% gross to net ratio decided on for open space and infrastructure requirements. Although the precise minimum size site using this calculation was 107ha, 100ha was used as a minimum search size.
- 4.9 Seven potential new areas were identified for a settlement across the district. These broad areas made up the majority of open land that did not have an absolute constraint or was not within 250m of an existing settlement. The largest of these areas was to the northwest of the borough, split into three smaller parcels by the M25.
- 4.10 The assessment considered within each parcel the area of at least 100ha that would make the least contribution to green belt purposes. The assessment then considered as components of the overall harm the highest contribution for each Green Belt purpose within the area and rating for the level of impact on the contribution of adjacent Green Belt land that would result from release of the land in question. The Green Belt harm was rated in the same way as in the Stage 2 assessment.
- 4.11 In summary of the findings, 100ha releases of land in any search area were found to cause high or very high harm in all cases. Areas 1, 2 and 6 found south of Chorleywood, south of Rickmansworth and east of Abbots Langley respectively, release would cause very high harm and areas 3, north of Croxley Green and south of M25, 5, north of Abbots Langley, 7 between Abbots Langley and Leavesden and the M25 and 4 (which had 2 locations assessed within it on the northern edge of the district, including Bucks Hill and an area right across the parcel including Sarratt) would cause high harm.

#### **Overall Conclusion of previous Assessments**

- 4.12 Therefore, these studies showed overwhelmingly, the Green Belt in Three Rivers still performed the role it was intended to. It also showed that almost half of the Green

Belt would be considered to cause moderate-high or high harm if removed for development. There were similar results when searching for a new area for a standalone settlement, with all areas showing high or very high harm impact of a minimum of 100ha removed. The caveat to this is that the reports stated that harm should not be looked at in isolation and that such factors as sustainable locations should be considered when selecting sites in the Green Belt, even in the higher harm areas.

#### **4.13 New Green Belt Assessment**

- 4.13.0 Given that our housing (and other) needs cannot be met in full on land outside of the Green Belt, we are in the process of undertaking a further Green Belt Review to identify grey belt, and to assess whether altering Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.
- 4.13.1 If it is considered that Green Belt land should be released, this would be undertaken using a sequential approach. The NPPF sets out that plans should give first consideration to previously developed land, then consider grey belt land which is not already previously developed and then consider other Green Belt locations. If need can still not be met on previously developed land and grey belt locations, other more sustainable sites in the Green Belt may have to be considered. To aid with this, the new Green Belt study will be mapping out the grey belt locations at the settlement edges across the district.
- 4.13.2 It should be noted that only sites in sustainable locations that are assessed as being suitable for development in the Strategic Housing and Employment Land Availability Assessment would be considered for potential allocation. Not all grey belt sites are appropriate for development. Therefore, much grey belt land will potentially be rejected as being either unsustainable or unsuitable.
- 4.13.3 As the concept of grey belt and the requirement to consider whether development in the plan would fundamentally undermine the function of the grey belt as a whole are new additions to national policy and guidance, the new Green Belt review must grapple with new this new policy and guidance, and consider definitions for terms therein, without any precedent.
- 4.13.4 A particularly challenging consideration has been around the definitions of towns and villages as well as the definition of large built-up areas. Specifically, when identifying grey belt, relating to Green Belt purpose (a) the guidance states that villages should not be considered large built-up areas. It also sets out that Green Belt purpose (b) only relates to the merging of towns not villages. These definitions have been fiercely debated in the planning community, and there are already examples of appeals where the planning inspector has had to judge whether a settlement is a town or a village in order to decide whether a site is grey belt or not. In terms of Green Belt protection, it is preferable to be identified as a town, although residents of settlements that are on the cusp of the large village/small town often prefer to refer to the settlement as a village.
- 4.13.5 Our current settlement hierarchy defines the district's settlements as the Principal Town, key centres, secondary centres, and villages, For the purposes of the Green Belt review we will be treating the Principal Town and key centres as towns.

- 4.13.6 Although villages are not considered in the assessment of Green Belt purposes (a) and (b), this does not mean that they cannot be protected by other policies that do not relate to Green Belt. Especially those relating to character such as paragraph 135 in the NPPF.
- 4.13.7 The report is currently being finalised by the consultants and the findings of the study will be added to the topic paper once it is ready to publish.

## **5 Conclusion**

- 5.1 Through the introduction of grey belt, the government has significantly updated national Green Belt policy. The intention is to make it easier to release the poorest performing parts of the Green Belt for development.
- 5.2 The expectation is that local planning authorities will meet their development needs in full unless this would lead to the function of the Green Belt being undermined as a whole. As such, the government has set out in national policy that meeting housing need constitutes exceptional circumstances for Green Belt release. It is therefore clear that we are expected to release Green Belt land in order to meet the district's development needs.
- 5.3 Ultimately, changes to national policy have clarified the government position but little has changed materially. The overall thrust of the NPPF has always been to enable sustainable development and for local planning authorities to plan for the needs in their area with Green Belt release being required in exceptional circumstances.
- 5.4 The ongoing Green Belt Review will map out grey belt land and provide the strategic insight needed to assess whether the proposed development would undermine the function of the Green Belt as a whole.

The vast majority of development in the Local Plan will need to be in the Green Belt, and as such the Green Belt reviews undertaken by the council form a crucial part of the evidence base. It is difficult to see how meeting the standard method figure in full would not result in unacceptable harm to the Green Belt. It is therefore through this Green Belt evidence work that the council will be able to inform its decisions on where best to focus future growth. Once the review is completed, this topic paper will be updated with its findings.

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