

Three Rivers District Council

# Sub Committee Report

11 March 2025

## LOCAL PLAN SUB COMMITTEE – 11 March 2025

### PART I

#### Gypsy and Traveller Accommodation Assessment (DoF)

#### 1 Summary

- 1.1 This report provides an overview of the Gypsy and Traveller Accommodation Assessment (GTAA) which has been prepared to assist with the formulation of the emerging Local Plan.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to note the contents of this report and agree to publish Appendix 1 to the emerging Local Plan Evidence Base, which can then also be used by Development Management during decision-making.

#### 2 Background

- 2.1 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.
- 2.2 The 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). It must be noted that the outcomes of this study supersede the outcomes of the previous GTAA (2017).
- 2.3 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 will be prepared in due course that reflects the changes in the PPTS. However, it is important to note that ORS have stated that the overall need figure included within the GTAA will not change. To summarise, the need arising from households meeting the planning definition (as a result of the December 2024 changes) will increase from 41 pitches to 44 (as households currently designated as not meeting the planning definition will now likely be considered to meet the planning definition) and the need from households who are listed as not meeting the planning definition will reduce from 3 pitches to 0, retaining the overall need figure of 49 pitches from 2024-2040.

#### 3 Policy Context

##### NPPF

- 3.1 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”.*

- 3.2 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)

- 3.3 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.

- 3.4 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.*

- 3.5 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”.*

- 3.6 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

- 3.7 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”.

#### 4 Key Findings from the Gypsy and Traveller Accommodation Assessment

##### 4.1 Pitch Needs – Gypsies and Travellers

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

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

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

- 4.1.2 Figure 2 below sets out the need for gypsy and traveller (those who meet the planning definition) pitches 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>

Figure 2. Need for gypsy and traveller (who meet the planning definition) pitches by year periods

- 4.1.3 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).
- 4.1.4 The need of 5 pitches arising from households with undetermined need will be met through criteria-based policies.
- 4.1.5 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. Although as noted above, in the updated GTAA (to be completed in due course), the need from households who are listed as not meeting the planning definition will likely reduce from 3 to 0.

##### 4.2 Plot Needs – Travelling Showpeople

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

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

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

- 4.2.2 Figure 4 below sets out the need for travelling showpeople (those who meet the planning definition) plots 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>

Figure 4. Need for travelling showpeople (who meet the planning definition) plots by year periods

- 4.2.3 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).
- 4.2.4 The need of 10 plots arising from households with undetermined need will be met through criteria-based policies.

#### Transit Provision

- 4.2.5 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.

#### 4.3 Five Year Need

- 4.3.1 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.
- 4.3.2 Five 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 the NPPF.
- 4.3.3 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.

#### 4.4 Meeting Need

- 4.4.1 The GTAA concludes that “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

*itches. The Council should also consider the regularisation of sites that are unauthorised". We are currently exploring different options, including engaging with GATE Herts to identify ways to meet the need set out in the GTAA.*

- 4.4.2 The GTAA also sets out that *"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"*.
- 4.4.3 With regards to travelling showpeople, the GTAA recommends *"that the current need could be addressed through the intensification or expansion of existing yards in Three Rivers"*.

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

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

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

- 6.1 None specific.

## **7 Recommendation**

- 7.1 That the Local Plan Sub-Committee note the contents of this report and agrees to publish the Gypsy and Traveller Accommodation Assessment (December 2024) to the emerging Local Plan Evidence Base (online website).

## **8 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)

## **9 Appendices**

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

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