

## **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.