

Three Rivers District Council

Local Plan Sub-Committee Report

25 November 2025

PART I

**Gypsy, Traveller and Travelling Showpeople Update
(DoF)**

1 Summary

- 1.1 This report provides an overview of how the council can meet its identified need for gypsies, travellers and travelling showpeople. The report will provide policy context, review approaches of some neighbouring local authorities, discuss the findings of the council's GTAA and explain some of the potential approaches that can be taken to meet the accommodation needs of gypsies, travellers and travelling showpeople.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to note the contents of this report and agree with officers' recommendation that the council focusses on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

2 Policy Context

- 2.1 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; people who rent their homes and people wishing to commission or build their own homes". Footnote 27 within Paragraph 63 of the NPPF sets out that "Planning Policy for Traveller Sites (PPTS) sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document".
- 2.2 Policy B of the PPTS relates to planning for traveller sites in a plan-making context. Paragraph 9 sets out that:
- 2.3 "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".
- 2.4 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 Key Findings from the Gypsy and Traveller Accommodation Assessment (July 2025)

3.1 The Council's Gypsy and Traveller Accommodation Assessment (July 2025) is an evidence study used to aid the implementation of Local Plan Policies and 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. The GTAA can be found in Appendix 1.

3.2 As set out by the GTAA, 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.

3.3 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.

3.4 Figure 1 below sets out the need for gypsy and traveller pitches by year periods, including the identified 5 year need (2025-2029).

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
0 – 20	2025 – 41	37	4

Figure 1. Need for gypsy and traveller pitches by year periods

3.5 Figure 2 below sets out the need for travelling showpeople plots by year periods, including the identified 5 year need (2025-2029).

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
0 – 20	2025 – 41	6	10

Figure 2. Need for travelling showpeople plots by year periods

4 Planning Applications in Three Rivers

4.1 Since the publication of the GTAA, the following applications have been submitted:

Application Number	Address	Gypsy/Traveller or Travelling Showpeople	Description	Net Gain in Pitches
25/1117/FUL	Land South of Old House Lane Kings Langley WD4 8RR	Gypsy/Traveller	Change of use of land for use as a residential caravan site, for one Gypsy/Traveller pitch accommodating two caravans (of which no more than one would be a static caravan/mobile home), alterations to existing hardstanding and erection of amenity building	Permitted for 1 pitch
25/0597/FUL	Land Adjoining Westwood End Bucks Hill Kings Langley Hertfordshire WD4 9AS (new site)	Gypsy/Traveller	Change of use to a residential caravan site, for occupation by Gypsies/Travellers, comprising the siting of 2 static caravans with associated access and hardstanding	Pending
25/1106/FUL	Little Lilly	Gypsy/Traveller	Removal of Condition 1 (Personal Permission), Condition 2 (Land Restored) and Variation of Condition 3 (Plans) and Condition 6 (Numbers of Caravans) pursuant to planning permission 23/1618/FUL to allow for an increase in number of static caravans to 10 and no provision of touring caravans	Withdrawn
25/0590/FUL	Land North of Toms Lane (new site)	Gypsy/Traveller	Change of use of land to create 4no. gypsy and traveller pitches including associated hardstanding and access	Pending

Figure 3. Summary of planning applications since publication of the GTAA

4.2 Since the publication of the GTAA, 1 pitch has been permitted by the council via a planning application. A total of 6 pitches are pending consideration. If the two pending planning applications are permitted, officers consider the district's overall identified need of 41 pitches would be reduced by 7 to 34.

5 Approaches by Neighbouring Local Authorities

St Albans City and District Council:

- 5.1 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) and 15 pitches for households with undetermined need (when using the locally derived proportion percentage), **totalling 95 pitches**. In their submission version of the plan, 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.
- 5.2 Following the Stage 1 Hearing Sessions of the Examination of the St. Albans City and District Local Plan, St Albans City and District Council consulted on additional evidence relating to gypsy and traveller accommodation between 4 July and 22 August 2025. The evidence suggested changes to the Local Plan and a list of sites. Further to the hearing session held on 15 October 2025, St Albans has now proposed that additional changes are made to their Local Plan, including the identification of specific sites to meet the identified need for gypsy and traveller accommodation in full and changes to Policy HOU6.
- 5.3 The policy has been amended to:
- Include specific reference to the accommodation needs of gypsies and travellers (which in St Albans case is 95 pitches) and the accommodation needs of travelling showpeople (which in St Albans case is 7 plots) and fully explain how this need will be met in full
 - Refer to the proforma assessment of the existing traveller sites in the district and the sites which were put forward in the Gypsy and Traveller Call for Sites. The identification of sites as 'Allocations' or 'Identified Opportunity Sites' reflects the degree to which there is evidence that they are likely to deliver additional pitches in the plan period.
 - Be specific in relation to how many pitches are expected within specific strategic sites (i.e 20, not up to 20)

Dacorum Borough Council:

- 5.4 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) and 14 pitches for households with undetermined need (when using the locally derived proportion percentage), **totalling 34 sites**. Their allocated sites include 20 pitches across strategic sized housing developments, 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. In their Local Plan, Dacorum stated that *"as the need for the showpeople yard is too small to justify a specific allocation, this can best be secured through an appropriate windfall planning application that we will test against suitable criteria within Strategic Policy H5"*.

- 5.5 Interestingly, whilst Dacorum have planned to meet their planning definition need in full (unlike St Albans' original submission), they have not allocated sites to meet any of their undetermined need. It must be noted that Dacorum submitted their plan for examination a number of months after St Albans, so are "behind" in terms of examination progress, so it is not yet known whether they will have to follow a similar course of action as St Albans and also meet part of their undetermined need (when applying the locally derived proportion of households meeting the planning definition).
- 5.6 In terms of gypsies and travellers, Three Rivers' need from undetermined households is 4 pitches, which is significantly lower than St Albans (19) and Dacorum (30). St Albans' and Dacorum's respective GTAA's set out that their high locally derived proportion of households that met the planning definition meant that they could have additional "determined" need derived from their high undetermined need. To put it simply, both Dacorum and St Albans had high levels of undetermined need, potentially due to a lack of interviews or information allowing the consultants to confirm whether a household met the planning definition of a traveller. A locally derived proportion of households that meet the planning definition is essentially the likelihood of a household meeting the planning definition based on local factors. In St Albans' case their GTAA set out *"there is a need for 19 pitches for undetermined households. If the locally derived proportion of households that met the planning definition (79%) were applied, this could result in a need for 15 pitches"*. Dacorum's GTAA set out *"there is a need for 30 pitches for undetermined households. If the locally derived proportion of households that met the planning definition (46%) were applied, this could result in a need for 14 pitches"*.
- 5.7 Prior to the Local Plan Sub-Committee meeting on 25th November, officers are meeting with ORS (consultants who produced our GTAA) to discuss whether we need to also consider the undetermined need when allocating sites in the emerging Local Plan. Members will be verbally updated on this at the meeting.

6 Three Rivers' Approach

- 6.1 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, regularisation, extension or intensification 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 will be required.

Travelling Showpeople Need

- 6.2 Three Rivers currently has 5 travelling showpeople yards. Two of which have planning permissions and 3 of which are "tolerated", and do not have planning permission.
- 6.3 In line with other councils, officers consider that the regularisation of these sites could contribute to the council meeting identified need for travelling showpeople.

There is currently a total of 19 “tolerated” plots across the district, which if were to be regularised, would result in 19 plots contributing to the identified need. This approach will be discussed further with ORS before the Local Plan Sub-Committee Meeting on 25th November 2025 and verbally reported back to Members.

Call for Sites

- 6.4 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.
- 6.5 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.
- 6.6 The gypsy, traveller and travelling showpeople call for sites period started on Friday 4 July and ended at 5pm on Monday 4 August 2025. The council did not receive any formal submissions that were suitable, available and achievable.
- 6.7 As such, the council can not rely on allocating new gypsy and traveller sites or travelling showpeople yards.

Intensification/Expansion of Existing Sites/Yards

- 6.8 The table below sets out an Initial assessment of the capacity to expand or intensify existing sites/yards.

Site/Yard	G/T or TSP	Approximate Developable Area (DA)	Current no. of pitches/plots	Max capacity	Potential Increase
Land adjacent 321B Uxbridge Road, Mill End, WD3 8DS	G/T	200sqm	1	The current 1	0
The Oaklands, Bedmond Road, Bedmond, WD5 0QE	G/T	5000sqm	24	The current 24	0
Fir Trees, Dawes Lane, Sarratt, WD3 6BG	G/T	n/a	2	n/a	n/a
Little Lily, Land rear of 59 Toms Lane, Kings Langley, WD4 8NT	G/T	3,400sqm	9	The current 9	0

Little Liz, Old House Lane, Kings Langley, WD4 8RS	G/T	10,000sqm	17	27	10
Keepers Cottage, Solesbridge Lane, Chorleywood, WD3 6AA	G/T	800sqm	1	3	2
Rear of 317-319 Uxbridge Road, Mill End, WD3 2DS	TSP	18,500sqm	16	19	3
Rear of 321 Uxbridge Road, Mill End, WD3 8DS	TSP	11,000sqm	2	11	9
Brickfield Farm, Oxhey Lane, Carpenders Park, WD19 5RF	TSP	10,600sqm	The current 15 (tolerated)	15	15 from regularisation
Meander, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP	1500sqm	The current 2 (tolerated)	2 plots	2 from regularisation
Wood Yard, Deadmans Ash Lane, Sarratt, WD3 6AL	TSP	1500sqm	The current 2 (tolerated)	2 plots	2 from regularisation

Figure 4. Initial assessment of the capacity to expand or intensify existing sites/yards

- 6.9 In terms of gypsy and traveller pitches, the GTAA sets out that “whilst there is no standard size for a Gypsy and Traveller pitch, guidance recommends an average pitch size of 320sqm”. As such, we have used an average pitch size of 320sqm to assess capacity of existing sites. It must be noted that the assessment also took into account site constraints and requirement for infrastructure (such as amenity buildings) and tracks/roads.
- 6.10 The initial assessment concludes that there may be potential to expand/intensify 2 existing gypsy/traveller sites, resulting in an additional 12 pitches. This will be investigated in greater detail by officers.
- 6.11 In terms of travelling show people, the GTAA sets out that “*whilst there is also no standard size for a Travelling Showpeople plot, guidance recommends an average plot size of 2,000sqm. 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". St Albans used an average of 720sqm for their travelling showpeople plots (although this was based partly on their only yard in their district).

- 6.12 Figure 4 above shows an initial capacity assessment of the travelling showpeople yards in the district. We have used a relatively conservative plot average of 1000sqm to assess capacity at existing yards. The table shows that there may be potential to intensify the use of 2 of the sites to result in an increase of 12 plots. This will be investigated in greater detail by officers.
- 6.13 Additionally, there is a piece of land to the south of "Rear of 317-319 Uxbridge Road, Mill End" and "Rear of 321 Uxbridge Road, Mill End" which could potentially be considered as an opportunity site for development. Further investigations would have to take place into ownership and potential site constraints before this is potentially allocated.

Allocations within Strategic Sites

- 6.14 Given the above, allocating parts of strategic general needs housing sites may be the largest contributor to meeting the accommodation needs of gypsies and travellers. This is an approach used by adjoining authorities such as St Albans and Dacorum.
- 6.15 It must be noted that allocating parts of strategic sites for gypsy and traveller accommodation will slightly reduce the overall capacity of such sites to provide general needs housing, which may impact upon the financial viability of the strategic scheme, however, it is not expected that a requirement to provide gypsy and traveller pitches would make a large-scale scheme unviable. It is envisioned that multiple strategic sites would be necessary to fulfil meeting the district's gypsy and traveller need, as it is unlikely to be feasible for one or even two strategic sites to fulfil the remaining need once expansion or intensification of existing sites has been considered.
- 6.16 Therefore, in Three Rivers' case, strategic sites can play a vital role in meeting the accommodation needs of gypsies, traveller and travelling showpeople.

Future Approach

- 6.17 As set out above there are a range of different methods in order to meet identified need, and often a combination of methods is most effective. In Three Rivers' case, allocating new standalone gypsy and traveller sites or travelling showpeople yards is not feasible given the lack of land being put forward during the call for sites. Additionally, there is limited capacity on most of the existing sites/yards to expand or intensify.
- 6.18 As such, officers recommend that the council focus on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

7 Policy/Budget Reference and Implications

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

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

8.1 Given the requirements of the NPPF and PPTS, if the council does not meet its identified gypsy, traveller and travelling showpeople need there is a strong possibility that the Plan may be found unsound at examination.

9 Recommendation

9.1 That the Local Plan Sub-Committee:

- Note the contents of this report
- Agree with officers' recommendation that the council focusses on intensifying and expanding sites/yards where possible and allocate parts of strategic general needs housing sites to meet the remaining need.

10 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)

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11 Appendices

Appendix 1 –Three Rivers District Council Gypsy and Traveller Accommodation Assessment (July 2025)

