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Winchester District Local Plan

Winchester District Local Plan 2040

Gypsy and Traveller Topic Paper

July 2024

Winchester City Council

Contents

1 Purpose and Structure of the Topic Paper

1.1. The draft (Regulation 18) Local Plan was published for consultation in late 2022 and included a section on gypsies, travellers and travelling showpeople which included a series of related policies (H12 – H18). These policies did not generate substantial levels of comment, but some important matters were raised and other issues relating to traveller provision have arisen since, which need careful examination and consideration.

1.2. The primary purposes of this Topic Paper are to respond to the key issues raised by these representations, to consider the traveller pitch / plot needs identified by the Gypsy and Traveller Accommodation Assessment 2022 (GTAA) and assess the scope to meet these. The opportunity is also taken to update the situation regarding known traveller accommodation needs and in relation to revised Government policy on travellers. Schedules summarising all the comments on policies H12 – H18 have been produced, including a recommended officer response to each comment. This Topic Paper enables the key issues to be grouped into related topics, discussed in relation to Government guidance and other relevant factors, and a recommended approach to be set out.

1.3. This Topic Paper relates primarily to the accommodation needs identified by the updated (2022) GTAA, updating these to the current situation, and exploring all realistic options for addressing expected needs. This Topic Paper deals with the accommodation needs identified within the Winchester Local Plan area (i.e. excluding the part of Winchester District within the South Downs National Park). The GTAA included conclusions regarding needs within the National Park that can be used by the National Park Authority as part of the evidence base for its emerging Local Plan. Some of the sites assessed by the GTAA may be subject to enforcement action by the Council, or current planning applications: this Topic Paper does not seek directly to influence the outcome of those processes. The Paper is structured as follows:

- Gypsy and Traveller Accommodation Needs
- Changes and Progress Since the GTAA
- Potential Sources of Gypsy and Traveller Accommodation Provision
- Conclusions / Implications for the Local Plan

2 Gypsy and Traveller Accommodation Needs

2.1. The accommodation needs of gypsies, travellers and travelling showpeople are currently addressed in the Gypsy and Traveller Development Plan Document (DPD) adopted in 2019. This was based on the Gypsy and Traveller and Travelling Showpeople Site Assessment (GTAA) that was undertaken jointly by the majority of Hampshire planning authorities in 2016. Rather than maintaining a separate DPD on travellers, the need for gypsy and traveller accommodation is incorporated into the emerging Local Plan. The Regulation 18 draft Local Plan addressed these needs in policies H12 – H18.

Updated Gypsy and Traveller Accommodation Needs Assessment (GTAA 2022)

2.2. As part of the initial work on the new Local Plan, Opinion Research Services (ORS) were appointed to prepare an updated Gypsy and Traveller Accommodation Assessment (GTAA). Work on the updated GTAA was delayed by the pandemic and the need to undertake a separate Pitch Deliverability Assessment (see below) to assess the scope to meet some of the needs arising. The updated Gypsy and Traveller Accommodation Assessment was published in October 2022 alongside the Pitch Deliverability Assessment.

2.3. The GTAA covers the whole of Winchester District, where the City Council is the housing authority. This differs from the Local Plan area that excludes the part of the District covered by the South Downs National Park. The GTAA includes separate assessments of traveller needs for the SDNP part of the District and for the remaining Local Plan area. Traveller needs within the National Park Authority's area will be addressed in that Authority's emerging Local Plan, with the Winchester Local Plan dealing with needs in the non-SDNP part of the District.

2.4. The GTAA assessed the accommodation needs of the gypsy, traveller and travelling showpeople population 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. A total of 83 interviews or proxy interviews were completed with gypsies and travellers living on sites in the Winchester Local Plan area and a total of 20 interviews were completed with travelling showpeople. In addition, stakeholder interviews were completed with officers from the City Council and neighbouring local authorities. The fieldwork for the assessment was completed over an extended period between September 2019 and July 2022, due to the constraints of the pandemic. The base date for the GTAA is July 2022.

2.5. The GTAA reflects the guidance contained at the time in the Government's Planning Policy for Traveller Sites (PPTS) 2015. This remains relevant, with the exception that Government changed the definition of 'travellers' contained at Annex 1 of the PPTS in December 2023. This section of the Topic Paper considers the findings of the GTAA as published: the implications of the change

to the PPTS definition for the GTAA and Local Plan are considered further in section 3 below. The GTAA therefore sets out accommodation needs for those households that met the 2015 PPTS planning definition of travellers, those that did not meet that definition, and those that were 'undetermined'.

2.6. The GTAA found that there were 106 gypsy or traveller households identified in the Winchester Local Plan area that met the planning definition; 38 undetermined households that may meet the planning definition; and 33 households that did not meet the planning definition. The GTAA also found that there were 27 travelling showperson households identified that met the planning definition; 8 undetermined households that may meet the planning definition; and 2 households that did not meet the planning definition. Future needs for the different groups and categories were assessed as:

Table 1 – 2022 GTAA Identified Needs for Traveller Households

Traveller Group	Years 0-5 2022-26	Years 6-10 2027-31	Years 11-15 2032-36	Years 16-17 2037-38	Total
GT – definition	79	14	15	7	**115**
GT – non-definition	32	5	5	3	**45**
GT – undetermined	32	3	4	1	**40**
GT – Totals	**143**	**22**	**24**	**11**	**200**
TSP – definition	21	2	3	1	**27**
TSP – non-definition	1	1	1	0	**3**
TSP – undetermined	1	1	1	0	**3**
TSP – Totals	**23**	**4**	**5**	**1**	**33**

2.7. Section 8 of the GTAA reached conclusions and recommendations as to how the needs identified above could be met. For gypsies and travellers these include:

- for single concealed or doubled-up adults and teenagers who will need a pitch of their own in the next 5 years, it is likely that accommodation needs could be met through additional touring caravans on existing sites, which are generally equivalent to a pitch, as opposed to more formally set out pitches;
- for sites occupied by larger extended family groups, it may be possible to meet accommodation needs through a combination of shared static caravans, tourers and dayrooms on existing sites, which are generally equivalent to a pitch, as opposed to more formally set out sites with separate pitches;
- consider the regularisation of planning permission for sites that currently have temporary permission or are currently unauthorised, where it is difficult to identify alternative sites or could be accommodated without harm;

- use the Pitch Deliverability Assessment (PDA – see below) to determine what proportion of the need identified could be accommodated on existing private sites with permanent planning permission;
- address the need for households that meet the PPTS planning definition through new pitch allocations and the intensification or expansion of existing private sites, considering some of the approaches set out above. If this is not possible, a criteria-based policy would allow future needs to be met;
- explore options for bringing vacant pitches on the former public site at Tynefield back in to use, either as a public site or to lease to Travellers to run as a private site;
- carefully consider how to address any needs from undetermined households, from windfall applications from households seeking to move to Winchester (in migration), or from households currently living in bricks and mortar. In terms of Local Plan policies, the Council should continue to use Criteria-Based Policies (as suggested in PPTS);
- in general terms, the need for those households who do not fall within the PPTS planning definition should be met as part of general housing need, as all Travellers that do not meet the planning definition will have been included as part of the overall Local Housing Need determined through the Standard Methodology, as reflected in the NPPF (2021).

2.8. For travelling showpersons, the recommendations as to how the (more limited) needs identified could be met include:

- address the need for households that meet the PPTS planning definition through Local Plan policies, which may be a combination of yard/plot allocations, intensification or expansion, and through a criteria-based policy;
- for households who do not meet the PPTS planning definition, needs should be met through other Local Plan housing policies.

2.9. Overall, the updated GTAA establishes substantially higher accommodation needs for gypsies and travellers meeting the PPTS definition than the 2016 GTAA, with similar levels of need for travelling showpeople. There are also significant increases in the needs for 'undetermined' gypsies and travellers and those not meeting the PPTS, although less pronounced than for those meeting the definition, again with similar levels of need to the previous GTAA for 'undetermined' or non-definitional travelling showpeople.

2.10. While the GTAA does not comment on the reasons for the changes, comparison of the data from the 2016 and 2022 GTAAs indicates some key information behind the changes in gypsy and traveller needs:

- households on **authorised private gypsy and traveller sites** increased from a total of 29 in the 2016 GTAA to 85 in 2022 (all definitions and 'undetermined'). The increase appears to result from the substantial

numbers of pitches permitted since the 2016 GTAA (35 pitches between Sept 2016 and Aug 2023);

- households on **temporary gypsy and traveller sites** fell, with 9 in the 2016 GTAA and 6 in 2022 (all definitions and 'undetermined'). The reduction is due to previously temporary sites being granted permanent consent and one new area receiving temporary consents;
- households on **unauthorised gypsy and traveller sites** increased from a total of 11 (on 8 pitches) in the 2016 GTAA to 89 (on 69 pitches) in 2022 (all definitions and 'undetermined'). This very large increase appears to be driven particularly by two large areas of unauthorised use: Carousel Park, Micheldever and land at Firgrove Lane, North Boarhunt. Carousel Park was dealt with separately in the 2016 GTAA, with unauthorised pitches not included in the figure above, but now includes 19 unauthorised pitches (some occupied by non-travellers or 'undetermined'). It is believed that all or most of the difference between the number of unauthorised pitches (69) and the number of households on them (89) is explained by the multiple occupancy of pitches at Carousel Park. Most of the remaining unauthorised pitches were in the Firgrove Lane area, with 36 unauthorised pitches identified by the GTAA in various parts of this area, compared to 4 in the 2016 GTAA. This is due to unauthorised pitches being created between the dates of the GTAAs and does not include the Firgrove Lane Caravan Park which is now an authorised general residential caravan site.
- households on the **roadside or in-migration and bricks and mortar** were not separately identified in the 2016 GTAA, but account for 5 households in need in 2022 (all definitions and undetermined).

2.11. It can be seen a large part of the need identified by the GTAA is for gypsy traveller households on unauthorised sites, mostly at Carousel Park and Firgrove Lane. Even though the Council has not encouraged these developments, has taken enforcement action to remove them, the GTAA records their occupants as forming a key element of the 'current need' (years 0-5). Households on unauthorised developments are split fairly evenly between those meeting the PPTS definition, those not meeting it and 'undetermined' households. Most of the remaining 'current need' is from concealed households, doubling-up and overcrowding, amongst households both meeting and not meeting the PPTS definition. This high level of 'current need' (2022-26) amounts to 79 pitches for households meeting the definition, with 143 households in current need across all categories (see Table 1 above).

2.12. The 'future needs' for gypsies and travellers are more modest, although still significant, and derive mainly from the future needs of teenage children and new household formation. These are typically for about 15 pitches over each 5-year period for those meeting the PPTS definition, 5 pitches per period for non-definitional gypsies and travellers, and 4 per period for 'undetermined'.

2.13. Current needs for travelling showpeople arise due to concealed households, doubling-up and overcrowding, particularly for households meeting the PPTS definition, which total 21 plots for years 0-5. Most future needs for showpeople arise due to household formation, with some needs for teenage children in households meeting the PPTS definition. The future need for plots is relatively modest, typically being for 1-2 plots for each 5-year period for each category of showperson.

2.14. Section 4 below considers the current situation in terms of sites, recent provision of traveller pitches / plots, and options for accommodating the needs identified. Section 5 examines the implications for the Local Plan.

Gypsy and Traveller Pitch Deliverability Assessment

2.15. During the preparation of the updated GTAA it became clear that the high level of need being identified would require all options for delivery to be explored. A key opportunity for meeting future needs is through the intensification or expansion of existing authorised sites. Current policies in the Traveller DPD allow for such development, subject to criteria, and these are proposed to be carried forward into the emerging Local Plan.

2.16. The Council, therefore, commissioned the traveller Pitch Deliverability Assessment (PDA) to provide evidence on the suitability, availability and achievability of existing gypsy and traveller sites with permanent planning permission to meet traveller accommodation needs. This examined the capacity of sites through a combination of desk-based research and engagement with travellers living on sites. The PDA looked at needs on a variety of sites, including where occupiers met the PPTS planning definition and sites where they did not.

2.17. The initial stage of the PDA looked at 29 private gypsy and traveller sites, including 2 in the South Downs National Park. Following a preliminary assessment of planning constraints and needs on each site, the following 10 sites were taken forward to the next, more detailed, stage of assessment:

- 1 & 2 Willow Park
- Beacon Haven
- Bowen Farm
- Eastwood Yard (SDNP)
- Fir Tree Farm
- Joymont Farm
- Little Ranch
- Riverside
- Southwick Ranch
- Tynefield

2.18. The PDA concluded that, in principle, all the ‘current need’ identified in the GTAA on the assessed sites (15 pitches in the period 2022-26) could be met through the intensification or expansion of existing sites. It also concluded that, in principle, most of the ‘future need’ identified in the GTAA on the assessed sites could be met (11 of the 12 pitches needed for the period 2027-2038/39) through the intensification or expansion of existing sites and yards. These needs all

relate to travellers meeting the PPTS definition: following the initial stage there was no current or future need identified from households in the Local Plan area that did not meet the planning definition (9 sites). Current need was identified from a site in the SDNP, where households did not meet the planning definition, but it was not possible to determine whether this could be met on the site.

2.19. The PDA recommended that the Council considers how its results could contribute towards the potential allocation of pitches to contribute to meeting 5-year need and the identification of broad locations to meet future need requirements. It also recommended that the Council consider a criteria-based Local Plan policy to address need from undetermined households, proposals from new windfall sites, from in-migration and from bricks and mortar. It also suggested the Council may consider specific allocations on the sites that have been assessed in order to make a clear link between the need that has been identified and the sites that are in a position to potentially meet this need.

2.20. Full details of the methodology, assessment and results are contained in the Pitch Deliverability Assessment document and include detailed site assessments of each shortlisted site. A summary of the PDA results is also contained in the GTAA.

3. Changes and Progress Since the GTAA

3.1. The GTAA is relatively recent, with a base date of July 2022, but there have been some key changes to traveller policy, needs and provision since. These are described below, along with the implications for traveller needs and provision.

Smith Court of Appeal Judgement / Update to PPTS Definition of Travellers

3.2. In October 2022 the Court of Appeal allowed an appeal brought by Lisa Smith, a traveller who was challenging a planning appeal decision, on the basis that the decision was indirectly discriminatory. While this appeal related only to that specific planning inspector's decision, the Court clearly considered the definition of travellers in the Planning Policy for Traveller Sites (PPTS) to be discriminatory, by excluding people who had ceased to travel permanently for age or health reasons. The Court concluded that the Government had failed to justify the discrimination involved in the 2015 PPTS definition.

3.3. Following the Court of Appeal case the Government has amended the definition of gypsies and travellers used in the Planning Policy for Travellers Sites (Annex 1) to use that adopted in 2012, with this change applying from 19 December 2023 for plan and decision making. The Government indicated that it intends to review the approach to this area of policy and case law in 2024, but no further changes have been published at this time.

3.4. The Smith judgement was published just before the updated GTAA (both published October 2022). Therefore, while the GTAA referred to the judgement, it concluded that it was too early to identify the impact it would have on the assessment of traveller needs and noted that the GTAA covers all travellers, whether meeting the PPTS definition or not (GTAA paragraph 2.35). At the time of the GTAA the PPTS definition of travellers had not changed, so the definition used in the GTAA is the 'old' (2015) definition.

3.5. It can be seen from Table 1 above that a substantial part of the need for traveller accommodation arises from households that were found not to meet the planning definition, or were 'undetermined'. This is particularly so for gypsies and travellers, rather than for travelling showpeople. The GTAA had already noted that the housing needs of gypsy and traveller households that did not meet the planning definition still had to be considered, with the information in the GTAA helping to do this (GTAA paragraph 3.38), this also being a requirement of the Housing and Planning Act 2016. The 2015 PPTS indicates that local plans should set pitch targets for travellers meeting the Annex 1 definition and identify a supply of sites (PPTS paragraphs 9-10). Following the change to the PPTS, the definition of travellers is now widened and could include households identified by the GTAA as 'non-definitional' and 'undefined' travellers. In any event, the Council is required to consider the need for culturally appropriate accommodation for all travellers, whether or not they meet the PPTS definition.

3.6. Accordingly, the PPTS definition is no longer particularly helpful in plan-making and, as a starting point, the totality of the needs identified by the GTAA have been taken into account when considering the needs which the Local Plan should be aiming to meet. The GTAA concludes that these amount to a potential need for 200 gypsy and traveller pitches and 33 travelling showpersons plots over the period assessed. As part of the preparation of this Topic Paper a review of traveller accommodation needs and provision has been undertaken by Council officers (see below). This has indicated that the vast majority of traveller sites provide family accommodation and that the families occupying them consist, wholly or partly, of households with traveller or travelling showperson heritage. The only exceptions would seem to be a few large sites where there is unauthorised occupancy, including by non-travellers using the sites for general residential accommodation.

3.7. In assessing compliance with the definition of travellers, the GTAA considered whether people were 'nomadic': i.e. whether they travelled for the purpose of seeking their livelihood, which can include seasonal travel. Where some family members stay at home to look after children or dependants the household can still be considered to be travelling. Therefore, it may be that some family sites in Winchester include members that are not actively travelling at a particular point in time, or are not of traveller heritage, but most sites as a whole are clearly in gypsy traveller or travelling showpersons use. This, along with the need to consider the need for culturally appropriate accommodation, means that the question of which households meet the updated planning definition is somewhat academic in assessing the needs to be accommodated by the Local Plan. It will, however, continue to be an important factor in considering planning applications and appeals, where the occupancy of the accommodation may need to be limited by planning condition.

Review of Traveller Accommodation Needs and Provision

3.8. Officers from the Council's Strategic Planning, Development Management and Enforcement Teams have reviewed all the traveller sites identified in the GTAA and sought to identify whether any new sites have been created or existing sites lost. The first area to investigate is whether there have been any known changes in the accommodation needs identified. The GTAA does not identify the needs of individual sites / households, for privacy protection reasons, although some information was provided confidentially to the Council. This information was reviewed alongside officers' knowledge of individual sites and occupiers, including the needs of children, information gathered from planning applications / appeals and for the DLUHC Traveller Caravan Count 2024, in an attempt to update the needs identified in the GTAA. This also used information from the PDA, but was not to the same level of detail and did not involve interviewing or having discussions with occupiers.

3.9. Each of the traveller sites identified in the GTAA (GTAA Figure 12) has been reviewed, with the aim of identifying any known changes to the occupiers or their needs since the GTAA, the current planning situation in terms of authorised / unauthorised uses, whether any enforcement action or appeals are planned / ongoing, and whether there appears to be potential to meet accommodation needs on or adjoining the sites.

3.10. This exercise does not claim to be as comprehensive as the GTAA, so can only be used to give an estimate of the position. Also, because of the sensitivity of the personal information involved, only aggregated conclusions rather than site-specific information or recommendations are set out. Nevertheless, it is possible to draw some clear conclusions about changes to traveller needs on certain types of sites and in terms of the Plan periods in which needs arise. The main findings are set out in relation to key headings below.

Unauthorised sites

3.11. The needs of gypsy travellers on unauthorised sites form a large part of the overall need for accommodation. The GTAA's 'current need' assessment for all categories of gypsy travellers on unauthorised sites (definitional, non-definitional, undetermined) totals some 63 pitches (total 'households on unauthorised developments' from GTAA Figures 16, 32 and 40). In addition, the GTAA makes an assessment of other 'current need', which arises from concealed / doubled up / overcrowded households, and 'future need', particularly from teenage children and new household formation. The GTAA does not specify how much of the these needs arise from unauthorised sites, but confidential background information provided with the GTAA and officer knowledge indicates current needs amount to about half as much again and for future needs the figure is higher still, meaning that the total need arising from unauthorised gypsy traveller households is in the order of 140 pitches, over 2/3rds of the total gypsy household need of 200 pitches.

3.12. In contrast, the GTAA does not identify any unauthorised travelling showpersons' sites (GTAA Figures 18, 34 and 42). There are a few 'tolerated' plots, which are allocated for travelling showpersons' use by the Traveller DPD, but do not yet have planning consent (at The Nurseries, Shedfield). Other 'current need' for travelling showpersons' accommodation arises from a small number of plots for concealed / doubled up / overcrowded households and a similar amount for future need arising from teenage children and household formation.

3.13. There are two large areas of traveller uses which generate the majority of the unauthorised gypsy traveller need: sites in the Firgrove Lane area of North Boarhunt, and land at Carousel Park, Micheldever. Between them these areas generate over half of the total need for 200 gypsy traveller pitches. Other unauthorised gypsy traveller sites are mostly small family sites, although one of these had a significant number of unauthorised pitches at the time of the GTAA.

The officer review of traveller needs has identified the following key changes to gypsy traveller needs on unauthorised sites:

- Firgrove Lane area: There are 6 authorised gypsy traveller pitches in this area but there were many other unauthorised caravans present at the time of the GTAA. There is now an extant enforcement notice requiring the removal of these and most have been removed. This includes all unauthorised gypsy traveller caravans (some caravans were in general residential occupation). There is, therefore, no longer any unauthorised gypsy traveller accommodation in this area and as a result there are now no needs arising from unauthorised households.

  The GTAA identifies 36 unauthorised pitches in the various parts of Firgrove Lane (GTAA Figure 12), so their removal means that the 'current need' for authorised pitches is reduced by 36. In addition, the GTAA includes 'current needs' arising from these pitches to address concealed households, doubling-up and overcrowding, and 'future needs' to provide for teenage children and new household formation. From background information provided for the GTAA and knowledge of the site, it is estimated that 'current needs' of about 13 pitches were included in the GTAA due to overcrowding, etc. Future needs are not thought to have included children, so are based on applying a household formation rate of 30% of the 'household base' (based on 2% per annum over the last 15 years of the GTAA). Applying this to the household base of 36 pitches results in a need for 11 pitches from household formation, which will not now arise. Accordingly, the removal of unauthorised pitches from the site is expected to reduce the GTAA pitch need by 60 pitches (36 + 13 + 11 = 60).

- Carousel Park: This site has consent for 9 travelling showpersons' plots but the majority have been subdivided and were occupied by gypsy travellers and general residential caravans at the time of the GTAA. The Council has issued an enforcement notice and an appeal was heard in late 2023. The appeal was allowed (April 2024) and consent granted for use of the site for 24 traveller pitches, in addition to 2 travelling showpersons plots occupied at the time. The site is, therefore, now authorised for gypsy traveller and travelling showperson use and all unauthorised accommodation (now occupied by non-travellers) is to be removed. As a result, there are no unauthorised traveller needs now on this site. The appeal decision took into account of the personal circumstances of the travellers occupying the site, including the needs of children. Limits were placed on the number of static caravans that could be accommodated on each pitch (47 in total), taking account of the current needs of the occupiers, including teenage children.

  The site is recorded by the GTAA as accommodating 19 unauthorised pitches, although the appeal decision authorised 24 pitches. This authorisation means that the 'current need' for authorised pitches is reduced by 19. In addition, some of the pitches were subdivided meaning

there was significant doubling-up and overcrowding. These personal circumstances were taken into account in the limits on the number of caravans each site could accommodate, as set in the appeal decision. It is estimated that 'current needs' of about 15 pitches were included in the GTAA to account for this, which are not now needed. It is also known that there were large numbers of children on the site and it is estimated that a need for 10 pitches was included in the GTAA for pitches for teenage children. These needs were also taken into account by the appeal decision, so should not be added to the future need for pitches. Accordingly, the granting of consent for 24 pitches for traveller use at Carousel Park, accommodating a maximum of 47 static caravans, is expected to reduce the pitch needs identified in the GTAA by 44 pitches (19 + 15 + 10 = 44).

- Small unauthorised sites: The GTAA lists 5 smaller unauthorised sites accommodating 14 pitches. On two of these sites 9 additional pitches have now been granted planning consent, with one further site found to already have consent for 1 pitch[1]. A further 2 sites have been occupied unlawfully since the GTAA, with 3 pitches. Two of these pitches are subject to current applications / appeals, along with one other site, totalling applications for 3 pitches. Therefore, of the 14 unauthorised gypsy traveller pitches on small sites at the time of the GTAA, 10 are now authorised with 1 more subject to a planning application. Three additional unauthorised pitches have been created, with 2 subject to planning applications / appeals. Other 'current needs' relating to doubling-up, overcrowding, etc will have been taken into account in permitting these applications, although the figures are likely to be very small. Equally, 'future needs' for teenage children will be taken into account and new household formation will be modest. While these may reduce needs slightly, no allowance is made for this.

  Therefore, current needs on small unauthorised gypsy traveller sites have been reduced by 10 pitches, with 3 new unauthorised pitches added, two of which are subject to current planning applications / appeals. Accordingly, changes on small sites that were unauthorised at the time of the GTAA have reduced the GTAA pitch need by 7 pitches (10 - 3 = 7).

3.14. It can be seen that a large part of the 'current need' for gypsy traveller pitches arising from unauthorised sites has either been met or removed through new planning consents and enforcement action. This is thought to include all non-traveller (general residential) accommodation, meaning that all remaining needs relate to households with traveller and showperson heritage, although these may or may not meet the latest PPTS definition. The Council has considered whether any traveller households were displaced and have moved elsewhere in the District, resulting in the identified needs moving rather than being removed. In

[1] Greenacres, Shedfield: appeal for 5 additional pitches allowed Oct 2023 (APP/L1765/W/20/3259672), The Paddock, Durley: planning consent for 4 additional pitches granted Jan 2024 (23/01326/FUL), Woodley Farm, Lower Upham: appeal for 1 pitch allowed Sept 2016 (APP/L1765/W/15/3131614).

carrying out the annual Caravan Count, and the Council's normal enforcement and development management functions, officers have sought to identify whether any new sites have appeared, but none have been identified as a result of the above enforcement actions. Generally, displaced occupiers are thought to be non-travellers who appear to have moved into other residential accommodation, or out of the area, and have not generated a new need for traveller accommodation on other sites in the District.

3.15. Therefore, the officer review of unauthorised gypsy and traveller pitches has resulted in the 'current need' figure in the GTAA being reduced by 90 pitches (49 at Firgrove, 34 at Carousel Park, and 7 on smaller sites = 90). Where unauthorised pitches have been removed they will not generate any 'future' needs', so 'future needs' are also reduced by about 21 pitches as a result (11 pitches at Firgrove and 10 at Carousel Park = 21). A further small number are subject to current planning applications / appeals, although their needs are not currently met. The overall reduction in the need for gypsy traveller pitches arising from unauthorised sites is therefore about 111 pitches.

New consents / changed needs

3.16. In addition to the changes noted above in relation to unauthorised sites, there are 3 authorised gypsy traveller sites and 1 travelling showpersons' site where the officer review has identified that needs have now been met, either by the changes to household needs noted in the PDA (2 sites) or recent planning consents (2 sites)[2]. These sites are estimated to have a 'current need' in the GTAA of 2 gypsy traveller pitches and 1 travelling showpersons' plot. Future needs are estimated to have been minimal. These needs have now been addressed, either by changes in needs or new consents (totalling 8 pitches / plots), so this results in a reduction in 'current need' of about 2 pitches for gypsy traveller needs and 1 plot for travelling showpersons' needs.

Revised Local Plan Period

3.17. The GTAA covers the period from its base date of July 2022 to 2038, reflecting the Plan period at the time the GTAA was commissioned. Household needs in the time periods after the first 5 years of the GTAA relate to estimated new household formation, as the other main 'future need' need (from teenage children) is addressed within years 1-5. The GTAA divides accommodation needs into 3 x 5-year periods for years 0-15, with a 2-year final period of 2037-38. It is proposed that the Local Plan period will now run to 2040, so a further 2 years' worth of new household projections should be added to those identified by the GTAA.

[2] PDA sites at Willow Park, Swanmore and Riverside, Highbridge no longer have needs for 3 pitches. New consents at The Bungalow, North Boarhunt: planning consent for 4 additional travelling showpersons' plots granted Sept 2023(23/01251/FUL) and Ourlands, Knowle: appeal for 1 additional pitch allowed Oct 2022 (APP/L1765/W/21/3271015).

3.18. New household formation in the GTAA is based on a growth rate for gypsy travellers and travelling showpeople, applied to the base number of households. However, this base number has been revised as a result of action on unauthorised sites, with paragraph 3.15 above estimating that 'future needs' have been reduced by about 21 pitches for gypsy travellers as a result of enforcement action and new consents on unauthorised sites.

3.19. This reduction of about 21 gypsy traveller pitches for future needs has been spread across the three latter periods of the GTAA, with a reduction of 7 pitches in each of the periods (2027-31, 2032-36 and 2037-40). As the final period is now 4 years, rather than 2 years in the GTAA, the estimated household growth is increased to 4/5ths of the (revised) previous 5-years' growth. Applying this approach to all categories of gypsy travellers and travelling showpeople (definitional, non-definitional and undetermined) results in a total need for the revised final period (2037-2040) of 14 gypsy traveller pitches (an increase of 4 pitches for this period) and 4 travelling showpersons' plots (an increase of 3 plots), as illustrated in Table 2 below.

Table 2 – Changes to GTAA Needs for Traveller Pitches / Plots

Reason for Change	Change in Years 0-5 2022-26	Change in Years 6-10 2027-31	Change in Years 11-15 2032-36	Change in Years 16-19 2037-40	Total
Changes to unauthorised sites (GT)	-90	-7	-7	-7	-111
New consents / changed needs (GT)	-2				-2
Revised Local Plan period (GT)				+4	+4
Total GT change	**-92**	**-7**	**-7**	**-3**	**-109**
New consents / changed needs (TSP)	-1				-1
Revised Local Plan period (TSP)				+3	+3
Total TSP change	**-1**	**0**	**0**	**+3**	**+2**

Conclusion on Changes and Updates to the GTAA

3.20. Table 2 above summaries the updated information on gypsy traveller and travelling showpersons' needs, to show changes since the GTAA for each 5-year period of the Local Plan. The various categories (definitional, non-definitional and undetermined) have been amalgamated so as to avoid any risk of individual household needs being identified and to reflect changes to the PPTS definition of travellers.

3.21. Table 3 below provides the updated pitch / plot needs compared to the GTAA, using the information in Table 2 above. Changes from the totals in the GTAA (summarised at Table 1) are shown in red text with the scale of the change in brackets.

Table 3 – Updated Needs for Traveller Households

Traveller Group	Years 0-5 2022-26	Years 6-10 2027-31	Years 11-15 2032-36	Years 16-19 2037-40	Total
Gypsy travellers	51 (-92)	15 (-7)	17 (-7)	8 (-3)	91 (-109)
Travelling showpeople	22 (-1)	4	5	4 (+3)	35 (+2)

3.22. Overall, there has been a large reduction in need for the first 5-year period (2022-26) for gypsy and traveller pitches, primarily as a result of enforcement action on two large sites. This has reduced the size of the base population which has knock-on effects for new gypsy traveller household projections (periods 2, 3 and 4). There remains a substantial current need for gypsy traveller pitches in particular, now driven mainly by concealed households, doubling-up and overcrowding, with some need still arising from small unauthorised sites. There has been minimal change to the needs of travelling showpeople set out in the GTAA. Section 4 below considers how these updated needs may be addressed.

4. Potential Sources of Gypsy and Traveller Accommodation Provision

4.1. The previous section identifies high levels of accommodation needs, particularly for gypsies and travellers, albeit these are lower than at the time of the GTAA. This presents a challenge in terms of identifying possible sources of supply to provide the required pitches and plots. Nevertheless, the Council is expected *'to meet the area's objectively assessed needs'* (NPPF paragraph 35a) and to explore all reasonable options to do this, commonly referred to as *'leave no stone unturned'*. This section seeks to do this by considering all the possible options for providing pitches and plots to meet the needs identified by the GTAA, as updated above.

Review of Traveller Site Capacity

4.2. As noted in Section 3 above, Council officers have reviewed all the traveller sites identified in the GTAA, with the results in terms of changes in accommodation needs discussed above. The review also considered each of the traveller sites identified in the GTAA (GTAA Figure 12), looking particularly at the scope to meet the (revised) accommodation needs by either intensifying accommodation on the site, or expanding onto adjoining land. A selection of sites had already been assessed by the Pitch Deliverability Assessment (2022). The officer review sought to extend examination to all known sites, albeit that it was not to the same level of detail as the PDA and did not involve interviewing occupiers. This section considers the results.

Authorised Sites

4.3. The Pitch Deliverability Assessment reviewed 10 authorised traveller sites, of which 1 was in the South Downs National Park. It concluded that all of the 'current need' identified in the GTAA for sites outside the SDNP could be met (15 pitches) and that 11 of the 12 pitches needed for 'future needs' (92%) could be met.

4.4. The officer review identified that estimated current and future pitch needs could be met through site intensification on 8 gypsy traveller sites, and partially met on 1 further site, within the site areas safeguarded for traveller use (under Traveller DPD policy TR1). In other cases, the safeguarded areas were drawn quite tightly and it would be necessary to expand the site onto adjoining land. It was found that there was scope to do this on a further 8 gypsy traveller sites. It is believed that the land needed to do this is within the ownership of traveller families in all but one case, where officers were unsure of ownership. There was only 1 gypsy traveller site where it was concluded that needs could not be fully met by intensification or expansion, resulting in an unmet need for another 4 pitches.

4.5. For travelling showpeople, 4 sites were identified where safeguarded sites could be intensified to meet needs in full, with a further 2 sites having scope to partially

meet needs on-site. None of the showpersons' sites appear to have scope to expand onto adjoining land. One site was not felt to be capable of meeting needs by intensification or expansion, with 2 sites able to meet some but not all needs, resulting in an unmet need for another 12 plots. In most cases these were longer term needs arising from expected household formation (and therefore somewhat less proven needs).

4.6. Accordingly, the officer review of authorised gypsy traveller sites concluded that 8 (47%) of the 17 gypsy traveller sites which are believed to have remaining current or future needs could fully meet these through intensification within the existing safeguarded site. A further 8 sites (47%) could meet their needs in full by expanding onto adjoining land, most of which is known to be in the ownership of the relevant traveller family. Only 1 site (6%) could only partly meet its needs on-site. These results are consistent with those of the PDA, which found that 1 out of 10 sites could not fully meet all its needs (10% of sites, 8% of pitch needs).

4.7. For travelling showpersons' sites, 3 (50%) of the 6 sites which are believed to have remaining current or future needs could meet these fully through intensification within the safeguarded site, but no sites (0%) appeared to have scope to expand onto adjoining land. A further 2 sites (33%) could only partly meet their needs on-site, with an estimated need for 12 plots which could not be met. The PDA did not include any showpersons' sites, but it is clear that there is significantly less scope to meet estimated showpersons' needs within or adjoining authorised sites than is the case for gypsy travellers.

Unauthorised Sites

4.8. The situation regarding the 2 large sites at Firgrove Lane and Carousel Park is dealt with above (paragraph 3.13) where it is concluded that no traveller accommodation needs remain following enforcement action / appeals. Two other sites that were unauthorised at the time of the GTAA have received planning consent since[3], meeting their requirements. It is estimated that all of the 5 remaining unauthorised sites are able to fully meet their current and future needs on-site, including the 2 additional unauthorised sites that have been identified since the GTAA (see paragraph 3.13 above). Three of the 5 remaining sites are subject to current planning applications or appeals, which may resolve their needs either fully or in part.

4.9. Most of the resulting changes have been taken into account in updating traveller needs at section 3 above. There are only 3 unauthorised sites that were included in the GTAA and do not yet have needs resolved. It is estimated that all of these needs (100%) could be met on-site.

[3] (The Paddock, Durley and Greenacres, Shedfield)

Sites with Temporary Consent

4.10. The GTAA only identified a need for 6 gypsy traveller pitches arising from temporary consents, with no travelling showpeople on temporary sites. All of these are on land at the rear of the Chairmaker's Arms, Denmead and have consents which are due to expire in August 2024. One of the new unauthorised sites mentioned above is also in this location (1 pitch) and is subject to a current enforcement appeal. Previous planning Inspectors have concluded that this area is not suitable for permanent consents and it is a contentious site locally.

Conclusion

4.11. The results of the PDA and the officer review of traveller site capacity confirm that there is substantial scope for traveller needs to be met within or adjoining existing sites, particularly in the case of gypsy travellers. Both exercises suggest there is scope to meet over 90% of gypsy traveller pitch needs through site intensification or expansion. It is recognised that this is subject to the necessary planning application processes, so a much more modest assumption is adopted, that 75% of needs could be met in this way.

4.12. For travelling showpeople, there appears to be less scope for the intensification or expansion of existing sites. About half of sites could meet their needs in full, although others would be able to meet their estimated needs in part. Again, recognising the need for this to be considered through the formal planning process, a modest estimate that 50% of travelling showpersons' needs can be met by intensification or expansion of existing sites is used.

4.13. The existing Local Plan contains policies allowing for the intensification of existing authorised sites (policy TR5) and their expansion (TR6), subject to various criteria. The Regulation 18 emerging Local Plan proposed to carry these forward as policies H14 and H15. **It is recommended that, as a means of meeting a substantial part of the remaining need for traveller pitches / plots, the Local Plan continues to include policies H14 and H15, providing for existing authorised traveller sites to be intensified or expanded.**

Potential Site Allocations / Call for Sites

4.14. The Council has updated the Strategic Housing and Employment Land Availability Assessment (SHELAA) on an almost annual basis over recent years. As well as calling for sites to be submitted for residential development, the 'calls for sites' associated with each update also included traveller uses, employment, green infrastructure, etc. The Council added sites allocated in the Traveller DPD to the 2023 SHELAA update. But the only site promoted by landowners or travellers themselves was land east of Firgrove Lane, North Boarhunt (site BO06), with a suggested capacity of 28 pitches.

4.15. The consultants that produced the GTAA (Opinion Research Services) were also commissioned by the Council to use their contact list to notify travellers of the consultation on the Regulation 18 Local Plan and invite them to submit sites for consideration. As a result, 3 sites were suggested:

- Land east of Firgrove Lane, North Boarhunt (already submitted through the SHELAA, see above);
- Land at Springles Lane, Titchfield (not owned by the promoter but said to have been formerly occupied by travellers);
- Stablewood Farm, Swanmore (suggested by the owner who would like 2 additional pitches in the future).

4.16. Each of the sites above have been assessed with a view to establishing whether they are suitable for ongoing / expanded / new traveller use and, if so, their likely capacity:

Land East of Firgrove Lane, North Boarhunt

4.17. This is a large area of land which included some authorised traveller accommodation (6 pitches) and a large number of unauthorised units (36 pitches recorded in the GTAA). The Council has served enforcement notices against the unauthorised caravans and an appeal against this was withdrawn in 2023. The area is considered in Section 3 above, where it is noted that most of the unauthorised accommodation has now been cleared in accordance with the enforcement notice, with no travellers remaining in unauthorised accommodation. This area has, therefore, been found not to be suitable for additional traveller development and **it is recommended that this area should not be a Local Plan site allocation and that it is not pursued any further as a potential traveller site.**

Land at Springles Lane, Titchfield

4.18. This site was suggested to ORS by the occupier of a different traveller site, whose accommodation needs are now met by recent consents. The respondent thought that a site at the junction of Springles Lane had previously been occupied by travellers and may have potential for future use. Research into the planning history of land in this area suggests that land at Moorshill Farm, Fontley Road was subject to a historic planning application for a gypsy transit site, which was refused in 1982. Enforcement action was then taken to remove 2 residential caravans in 1987. It is, therefore, apparent that the land has never had any authorised traveller use.

4.19. This land is in the defined countryside outside of any built-up area. It is the 'Meon Settlement Gap' roughly mid-way between Whiteley, Fareham and Titchfield, about 1km from the nearest part of either settlement and further still from local facilities. Development in the area is of a scattered character and, while it is not subject to any other designations, it is in the generally open

landscape of the Meon valley. The site is not well contained or separated from the scattered housing in the area.

4.20. In addition, it is many years since the site was apparently unlawfully occupied by travellers. The planning history suggests the site has been redeveloped and its ownership is likely to have changed. It is not, therefore, expected that it would be available for traveller use. **It is recommended that this area should not be a Local Plan site allocation and that it is not pursued any further as a potential traveller site.**

Stablewood Farm, Swanmore

4.21. Stablewood Farm is one of several adjoining traveller sites at The Lakes, on the edge of Swanmore. ORS were advised of a future need by the current occupiers to increase the number of authorised pitches by two, so as to accommodate family members. City Councill officers also spoke to the occupiers and advised them that, in principle, this could be achieved within the scope of existing planning policies (Traveller DPD policy TR5 which allows for intensification of existing authorised sites). It is proposed above that this policy be carried forward in the new Local Plan (policy H14) and policy H15 allows for expansion of existing sites subject to various criteria.

4.22. One of the adjoining traveller sites (Willow Park) was assessed as part of the Pitch Delivery Assessment. This identified that there could potentially be flooding issues on that site, but concluded that a small increase in pitches could be acceptable. The inclusion of policies allowing for intensification or expansion of existing authorised sites should, therefore, allow this future need for 2 pitches to be met. **It is recommended that the Local Plan continues to include polices H14 and H15 to allow for the intensification or expansion of existing sites in appropriate cases**.

Assessment of City Council Land

4.23. The City Council is a landowner within the District and one possible source of supply is to assess Council-owned land. The Council's Estate team were asked to assess whether there was any land in the ownership of the City Council that could be made available to help meet traveller needs. In terms of land within the City Council ownership the following types of sites were investigated:

Description	No. of land entries
Housing	109
Public open space	23
Sewage treatment works	6
Car parks	6

Commercial property	6
Sports pitches / play areas	5
Riverside Walk	2
South Downs National Park	1
Nature reserve	1
Agricultural land	1
Public gardens	1
Total	161

4.24. The above table indicates that the vast majority of land parcels that are within the City Council's ownership are associated with housing. Many of these entries relate to grass verges or other small areas of land that make up Council housing estates, which are important to the amenity of these areas and not suitable for traveller pitches. The next largest group are parcels of public open space and most other entries relate to land or infrastructure needed for specific purposes, such as sewage treatment works, car parks, sports pitches and nature reserves. Again, these constitute important infrastructure, recreational or amenity assets and none have been identified as either surplus to requirements or suitable for traveller pitches.

4.25. There is one entry for 'agricultural land' which refers to an agricultural field which is currently let to a local farmer. This is identified as part of a Settlement Gap between Winchester and Littleton. This means it is not suitable or available for traveller use. **Having reviewed the land parcels owned by the City Council, the conclusion is that the Council does not own any land which would warrant further investigation for the provision of traveller pitches.**

Contact with Local Estate Agents

4.26. Winchester City Council Estates team were also asked to contact local estate agent firms in order to understand if they were aware of any sites that might be suitable for traveller site provision. The overall conclusion was that the local estate agents were not aware of any land that they have dealt with recently, or are currently dealing with, which would be regarded as suitable for this use. Other comments that were that any land on the edge of a settlement or that bordered the countryside would not instinctively be thought of as land suitable or available for gypsy or traveller pitches. Most landowners with such sites would initially be thinking whether they would be able to gain residential consent in the future, given that this is by far the highest land value use. **Accordingly, the contact with local estate agents did not identify any land that may have potential as a traveller site.**

Contact with Major Landowners

4.27. It would not be practical to contact all landowners within the District, and there have been several calls for sites and contact with local estate agents anyway, but there are a number of landowners of large estates in the District that might have suitable land for travellers. The following large landowners in the District were contacted in order to understand whether they may have any suitable land for traveller use (Hampshire County Council was also contacted as part of the Duty to Cooperate, see below).

- University of Winchester;
- Winchester College;
- Church Commissioners;
- Defence Infrastructure Organisation (MOD);
- O'Flynn Group (Sutton Scotney Estate);
- Rookesbury Estate;
- Hursley Estate; and
- Southwick Estate.

4.28. A sample copy of the letter that was sent to these large landowners is attached at Appendix 1 and the responses received are attached at Appendix 2. The responses indicate that none of large landowners were able to assist with putting forward land for traveller use, apart from the O'Flynn Group which is promoting a new settlement at Micheldever. Their response suggests that the landowners *'would, in principle, be amenable to considering the accommodation of some Gypsy & Traveller provision as an element of a wider allocation for a new settlement at Micheldever Station, to contribute towards mixed and balanced communities. Without such a comprehensive allocation for strategic scale development at Micheldever Station, we do not consider the 'Land at Micheldever Station' is suitable to accommodate a stand-alone or isolated Gypsy & Traveller site and would not be willing to provide land for such a use.'*

4.29. It is, therefore, clear that the owners of land at Micheldever would only consider traveller provision suitable, in principle, as part of a new settlement allocation at Micheldever Station. This option was considered at the Strategic Issues and Priorities stage of the Local Plan but was rejected following consultation and sustainability appraisal. It would not be appropriate to make a radical change to the Local Plan's development strategy only on the basis of traveller accommodation needs. In any event, the response simply offers to consider 'in principle' traveller provision and does not refer to the scale of land that could be available. Even if land were allocated at Micheldever Station, as part of a new settlement, it is only likely to become available to meet long-term future needs.

4.30. **Accordingly, the contact with major landowners did not identify any suitable land that may have potential as a traveller site.**

Tynefield, Whiteley

4.31. Tynefield is a former public traveller site, owned and operated by Hampshire County Council for about 30 years until 2015. It was sold to Tynefield Park Ltd following a tender process which sought to identify a suitable operator for ongoing traveller provision. However, the travellers that formerly occupied the site have now all moved away and the site is unoccupied and derelict.

4.32. The site has consent for 20 pitches and was previously laid out for 18 traveller pitches and a manager's bungalow. It is a substantial site which was assessed as part of the Pitch Deliverability Assessment (PDA). This concluded that the site could be reconfigured to help meet future need but highlighted *'a number of potential technical and logistical problems - mainly due to the size of the site and previous instances of anti-social behaviour'* (PDA page 31). The PDA recommended that the Council should speak to the owners to discuss how the site could be brought back into use.

4.33. Council officers had previously tried to make contact with the site owners via Hampshire County Council's Gypsy and Traveller Liaison Officer. They had also asked the County Council to consider whether the covenants applied to the sale of the site (requiring that it be maintained for traveller use) could be enforced, so as to restore it to traveller use in accordance with the terms of the land transfer. This contact indicated that the owners were having problems operating the site for traveller use and had aspirations for residential caravan use of the site. The County Council officers were reluctant to initiate legal action to enforce the covenants, which included a requirement to maintain 19 pitches for persons of a gypsy/romany background, because of the perceived difficulty and risks of court action.

4.34. Nevertheless, in view of the substantial need for traveller pitches, to which the site could make a significant contribution, the draft Local Plan safeguarded Tynefield as an existing authorised traveller site (policy H13) and made a specific site allocation for continued traveller use and expansion to 30 pitches (policy H18). The owners of Tynefield did not respond to the Regulation 18 Local Plan so the Council's Estates Team were asked to make contact with them to ascertain their intentions and aspirations, including whether the City Council may be able to acquire the land so as to bring it back into traveller use.

4.35. As a result, the site owners indicated that they had tried to maintain and improve Tynefield as a traveller site but that, due to rivalry with another local family, the site was vandalised every time they sought to improve it. They had therefore been forced to abandon attempts to reoccupy the site and were looking at other uses such as general residential caravans or housing. Attempts were made to clarify whether the site could be available for sale and a broad price range, but these were inconclusive. The Council's Estates team is continuing to try and engage in meaningful dialogue with the site owners.

4.36. This situation indicates that more proactive action may be needed from the Council if Local Plan policy H18 is to be delivered. Nevertheless, there is a clear

need for additional traveller pitches and Tynefield is an established traveller site with consent for up to 20 pitches, the Council would want to do what it can to maintain the site allocation. It is, therefore, continuing discussions with the landowners and starting the process of making capital budget provision to acquire the site at an appropriate price, if necessary by use of compulsory purchase powers. There are potentially grants available from the Department of Levelling Up and Communities that could assist with acquiring and laying out the site. It is likely that the management of the site would need to be undertaken by a specialist registered provider or management company.

4.37. While the site is unlikely realistically to contribute to current / 5-year pitch needs, it could make a valuable longer-term contribution. Therefore, **it is recommended that Tynefield continues to be allocated as a traveller site for about 30 pitches, by maintaining Local Plan policy H18.**

Provision From Large Housing Site Allocations

4.38. Some authorities are known to have a requirement for a number of pitches to be provided as part of new housing allocations. Examples have been identified at Mid Devon, Brentwood, Reigate & Banstead, Guildford, and Basingstoke. These approaches are summarised as:

- The Mid Devon Local Plan (2020) requires some pitches to be provided on strategic housing sites, which are mostly over 1,000 dwellings in size. The smallest site is 200 dwellings. Pitch requirements are between 5 and 10 pitches per site. It has not been possible to gain any information on whether any traveller provision has been achieved through these policies;
- The Brentwood Local Plan (2022) requires 5 pitches to be provided on a strategic housing site accommodating a total of 4,000 dwellings. A masterplan for the development has been approved, including the traveller pitches within the first 5 year phase. The Council resolved to approve an outline planning application in November 2023, including the required 5 traveller pitches, which are to be secured by conditions / S106 obligation;
- The Reigate and Banstead Local Plan (2019) requires four allocated urban extension sites to provide land for traveller pitches, to be secured through a legal agreement. These site allocations range from 75 to 290 dwellings and require the provision of 1 to 3 pitches. However, these strategic allocations will only be released when the 5-year housing land supply position indicates it is necessary. None of the sites have yet been released, so no traveller pitches have currently been provided through this policy;
- The Guildford Local Plan (2019) requires 5 allocated urban extension sites to provide land for traveller pitches, to be secured through legal agreements. Four of these site allocations are for 1,500 – 2,000 dwellings and require the provision of 6 to 8 pitches each. One smaller site

allocation (40 dwellings) requires the provision of 2 traveller pitches, although this appears to be at least partially owned by the Council. It also includes a policy requiring large windfall sites to provide traveller pitches, ranging from 2 pitches on sites of 500-999 dwellings to 8 pitches on sites of 2,000+ dwellings. The traveller provision is largely phased towards the later part of the Local Plan period, although outline consent has been granted for one site (including 6 travelling showpersons' plots), with a full application under consideration;

- The Basingstoke and Deane Local Plan (2016) requires traveller pitches to be provided on 4 strategic housing allocations, ranging from 450 to 3,400 dwellings. It does not specify how many pitches are to be provided on each site, with this to be determined through masterplans. The emerging replacement Local Plan (Regulation 18 draft published 2024) maintains a similar approach, including the sites previously allocated and some additional areas. It also introduces a new general requirement for large windfall sites to provide traveller pitches, ranging from 2 pitches on sites of 500-999 dwellings to 8 pitches on sites of 2,000+ dwellings. None of the allocated sites have yet been developed, and officers from Basingstoke & Deane have confirmed that at this stage no traveller sites have been provided through these policies.

4.39. The Winchester Regulation 18 Local Plan includes the existing 3 strategic allocations, which are permitted and under construction, with the only new large-scale allocation being at Sir John Moore Barracks, Winchester (policy W2). The need for Gypsy and Travellers pitches arises mostly in the south of the district. Hence the draft Local Plan did not include a policy requiring the provision of traveller pitches on housing allocations.

4.40. Most of the authorities mentioned above only seek traveller provision on very large housing sites, typically 1,000+ dwellings. The Guildford Local Plan and Basingstoke's emerging Plan seek provision from 'windfall' sites of 500 or more dwellings. Only Reigate and Banstead seek provision on smaller sites, with a requirement for allocated sites of 70 or more dwellings, although these will only be released if necessary to achieve a 5-year (general) housing land supply. Experience of these policies is that they have so far not provided any traveller pitches, with only two sites having progressed to the outline planning consent stage (due to deliver 5 gypsy traveller pitches at Brentwood and 6 travelling showpersons' plots at Guildford).

4.41. In Winchester's case, the Regulation 18 Local Plan included various site allocations which were carried forward from the adopted Local Plan, most now with planning permission or current applications, and sometimes under construction. Therefore, it is not realistic or reasonable to impose a substantial new requirement on these allocations, especially as they are likely to be permitted / completed before any policy requirement is adopted. Most other new housing allocations are either not in suitable locations (e.g. brownfield sites within Winchester) or are too small to realistically provide an element of traveller pitch provision.

4.42. The only site which is larger than the 500 dwelling 'windfall' threshold used by Guildford and Basingstoke, and exceeded by most other authorities, is Sir John Moore Barracks, Winchester (policy W2). Although this site is not ideally located for traveller provision, given the location of most existing families in the south of the District, the Defence Infrastructure Organisation (the current owners of the SJM Barracks site) was contacted as a major landowner (see above). No sites were offered in response to this contact (see Appendix 2). The Council has followed this up specifically in relation to Sir John Moore Barracks but the Defence Infrastructure Organisation who are disposing of this site have not to date indicated that they wish to pursue a disposal strategy that includes provision for gypsies and travellers as part of the redevelopment of this site for residential development.

4.43. Reigate and Banstead use a lower threshold of 70 dwellings, although these sites would only be released to address a 5-year land supply shortfall. There were 5 new housing site allocations in the Regulation 18 Winchester Local Plan on greenfield sites which could provide 70 or more dwellings, which could potentially achieve traveller pitches using the Reigate approach (W4, SH3, BW4, KW2, WK4). Of these, SH3 is now proposed for mixed housing and educational use, so would fall below the threshold, KW2 is an older person's housing site and WK4 has a resolution to grant planning consent. This leaves only 2 new housing site allocations to which a new requirement for traveller pitch provision could be applied (Courtenay Road, Winchester and Rareridge Lane, Bishops Waltham). Given that the promoters of these sites are likely to oppose the addition of such a requirement at this stage, and that it would only be likely to achieve 1 pitch per site, there would be minimal benefit in seeking to apply this requirement to these sites. Furthermore, these sites are phased to prevent development before 2030, so they could only provide for longer-term traveller needs.

4.44. Having examined local plans that seek traveller pitch provision as a proportion of housing on large sites, it has not been possible to identify anywhere that has yet achieved physical provision of sites. Such policies appear to be used to demonstrate how traveller needs could be met by local plans, but have so far only achieved consents on 2 sites. A similar approach in Winchester could be applied to a small number of sites, most only capable of achieving 1 pitch per site. Any delivery would be likely in the latter part of the Plan period, whereas the greatest difficulty in meeting needs is in the short term. Given the level of need, the timescale for adoption of the Local Plan against site development, and expected developer resistance, **it is recommended that the Local Plan does not include policies which seek to secure traveller pitches as a proportion of housing on larger sites. Similarly, a policy requiring provision on large windfall sites (typically 500+ dwellings) would be most unlikely to 'catch' any sites likely to come forward in this District.**

Apportioning Pitch Requirements to Parishes / Settlements

4.45. A representation on the Regulation 18 Local Plan suggested that the pitch requirements be distributed proportionately to each Parish or settlement in the

District. While this may appear at first sight to be an attractive proposition, it raises immediate questions as to what is an appropriate apportionment – should it be based on the settlement hierarchy (which would exclude smaller Parishes / settlements), be based on population, or simply divide the requirement by the number of Parishes / settlements? Any approach is likely to be criticised as an unfair 'apportionment' and would be difficult to secure support for.

4.46. More particularly, any site allocations could only be shown to be 'deliverable' if the site owner was willing to bring it forward for traveller purposes and if this were viable. It has been noted above that there have been various 'calls for sites', including for traveller sites, which have resulted in only 3 sites being put forward. It is concluded at paragraphs 4.18 – 4.23 that none of these sites are suitable for allocation in the Local Plan. Therefore, such an approach is unlikely to be 'deliverable' and **it is recommended that it would not be justified or feasible to apportion the traveller pitch requirement to Parishes / settlements in the absence of a clear method for doing so or a choice of deliverable sites that could be allocated.**

Windfall

4.47. The Regulation 18 Local Plan included Table 4, which set out the expected sources of traveller pitch provision. One of these was 'windfall', estimated at 65 gypsy traveller pitches and 17 travelling showpersons' plots. The Council's Authorities Monitoring Report 2023 (AMR) shows that 35 gypsy traveller pitches were permitted between 2016 and 2023, with 4 travelling showpersons' plots being permitted in the same period. However, 7 of the gypsy traveller pitches were on allocated sites, as were all the showpersons' sites, so cannot be defined as 'windfall'. Therefore, there were 58 remaining gypsy traveller 'windfall' pitches permitted in the 7 years since 2016, averaging 8 per annum, and no showpersons' windfall plots.

4.48. On this basis, the provision of 65 windfall gypsy traveller plots could be feasible, although 17 showpersons' plots are unlikely. Also, several of the sites involved intensification or expansion of existing sites, rather than being 'new' sites (so are taken into account above in relation to meeting needs on or adjoining existing sites) and permissions have reduced in recent years following a peak after the last GTAA / Traveller DPD. Therefore, while there is likely to be some windfall provision on new sites (not already accounted for by site intensification / expansion), this will be more modest. Evidence from the AMR suggests that new windfall sites (as opposed to existing site intensification / expansion) accounted for an average of about 2 pitches per annum for gypsy traveller sites and none for showpeople.

4.49. It is difficult to determine how many new traveller sites will be put forward over the Local Plan period, although experience and evidence suggests there will be ongoing demand. Also, given the conclusion that it will be difficult to maintain an adequate 5-year supply of sites, there will be a presumption in favour of permitting new sites. Therefore, it is considered appropriate to apply the

previous rate of development over the last 15 years of the Plan period, which could produce about 30 gypsy traveller pitches (2 pitches per annum x 15 years), but no showpersons' plots. Therefore, **it is recommended that the Local Plan includes a windfall allowance of 30 gypsy traveller pitches over the last 15 years of the Plan period, but that a windfall allowance cannot be evidenced for travelling showpeople.**

Duty to Cooperate - Contacting Local Planning Authorities and Hampshire County Council

4.50. Given the scale of traveller needs identified by the GTAA, it was decided to contact all the Local Planning Authorities adjoining Winchester's boundaries, along with Hampshire County Council, to highlight that the City Council may not be able to meet its traveller accommodation needs in full. The authorities were asked if they were able to help Winchester City Council meet the identified gypsy and traveller accommodation needs. The following Local Planning Authorities were contacted and a copy of the letter that was sent to them is included at Appendix 3:

- Basingstoke and Deane Borough Council
- East Hants Borough Council
- Eastleigh Borough Council
- Fareham Borough Council
- Hampshire County Council
- Havant Borough Council
- Portsmouth City Council
- South Downs National Park Authority
- Test Valley Borough Council

4.51. Responses were received from every authority that was contacted and these are reproduced at Appendix 4. None of the authorities were able to offer any assistance in helping to meet Winchester's traveller accommodation needs. Some were at an early stage of local plan preparation but thought it unlikely they would be able to assist, and East Hampshire were themselves facing a shortfall and had asked Winchester for assistance. Hampshire County Council had considered their land holdings but found none to be suitable for traveller use. Therefore, **the outcome of this work has not resulted in any assistance being forthcoming in terms of pitch / plot provision.**

Conclusion on Potential Sources of Traveller Accommodation

4.52. Having considered a range of potential options for traveller accommodation provision, as set out above, Table 4 below summarises the results:

Table 4 – Expected Supply from Potential Sources of Provision

Potential Source of Provision	Likely gypsy traveller supply (Years 0-5)	Likely gypsy traveller supply (Years 6-19)	Likely travelling showpersons supply (Years 0-5)	Likely travelling showpersons supply (Years 6-19)
Review of traveller site capacity	38 (75% of updated need)	30 (75% of updated need)	11 (50% of updated needs)	6 (50% of updated needs)
Allocate area of temporary sites	-	-	-	-
Site Allocations / Call for Sites	-	-	-	-
City Council Land	-	-	-	-
Contact with Estate Agents	-	-	-	-
Contact with Landowners	-	-	-	-
Tynefield, Whiteley	-	30	-	-
Provision from housing sites	-	-	-	-
Apportionment to Parishes, etc	-	-	-	-
Windfall provision	-	30	-	0
Duty to Cooperate/LPAs	-	-	-	-
TOTAL	**38**	**90**	**11**	**6**

5. Conclusions / Implications for the Local Plan

Pitch / Plot Requirements

5.1. Section 3 above updates the pitch and plot requirements identified by the GTAA. These have reduced significantly for gypsy traveller pitches as a result particularly of enforcement action on one large site and consent being granted on another. Extending the Local Plan period has increased needs slightly, resulting in a net decrease in gypsy traveller pitch needs and an increase for travelling showpeople. The resulting updated pitch / plot needs are as follows:

Traveller Group	Years 0-5 2022-26	Years 6-10 2027-31	Years 11-15 2032-36	Years 16-19 2037-40	Total
Gypsy travellers	51	15	17	8	91
Travelling showpeople	22	4	5	4	35

Sources of Provision

5.2. Section 4 above assesses the potential to achieve additional pitch / plot provision from various sources. Most of these are not expected to achieve additional provision and are not recommended for inclusion in the Local Plan. However, it is estimated that the following levels of provision can be achieved to meet the updated needs above:

Potential Source of Provision	Likely gypsy traveller supply (Years 0-5)	Likely gypsy traveller supply (Years 6-19)	Likely travelling showpersons supply (Years 0-5)	Likely travelling showpersons supply (Years 6-19)
Review of traveller site capacity	38 (75% of updated need)	30 (75% of updated need)	11 (50% of updated needs)	6 (50% of updated needs)
Allocate area of temporary sites	-	-	-	-
Tynefield, Whiteley	-	30	-	-
Windfall provision	-	30	-	0
TOTAL	**38**	**90**	**11**	**6**

Implications for the Local Plan

5.3. Drawing together the results summarised above, the following assessment of pitch / plot needs and potential supply emerges:

Table 5: Traveller Pitch / Plot Needs and Supply

	Gypsy traveller (Years 0-5)	Gypsy traveller (Years 6-19)	Travelling showpersons (Years 0-5)	Travelling showpersons (Years 6-19)
Pitch / plot need	51	40	22	13
Pitch / plot supply	38	90	11	6
Surplus / Shortfall	**-13**	**+50**	**-11**	**-7**

5.4. For gypsy travellers it can be seen that there is a shortfall of pitches in the first 5-year period and hence it would not be possible to currently demonstrate a 5-year supply of available sites. Provision in this period is from intensification or expansion of existing sites. A modest estimate has been made that 75% of needs could be met in this way, with the evidence suggesting it could potentially be about 90%. Also no windfall allowance is included in this period, even though policies would allow new windfall sites where they meet various criteria. It is, therefore, entirely possible that short-term needs could be met, but it is not possible to demonstrate that this will be from 'specific deliverable sites', as required by the PPTS.

5.5. Section 4 above has 'left no stone unturned' in assessing potential sources of supply. If the Tynefield, Whiteley site could be made available in the short term this would enable a 5-year supply of sites to be demonstrated. At the moment it is only possible to consider this as a longer-term source of supply, but efforts are being made to bring it forward earlier.

5.6. In the longer term, there is a substantial theoretical 'surplus' of gypsy traveller sites, although sites would only be brought forward through intensification, expansion or windfall if a need existed. As noted above, it would be beneficial if Tynefield could be implemented earlier, to move it from the later period to the first 5 years. If this were done it could enable a 5-year supply of sites to be demonstrated while still giving an adequate supply of pitches in years 6-19, from intensification or expansion of existing sites and windfall.

5.7. For travelling showpeople, it has not been possible to demonstrate how an adequate supply of plots could be achieved, either in years 1-5 or years 6-19. Nevertheless, section 4 above shows that 'no stone has been left unturned' in seeking to make adequate provision. This position reflects the situation at the time of the Traveller DPD, when it was also not possible to identify sufficient travelling showpersons' plots.

Recommended Local Plan Approach

5.8. The sections above make various recommendations as to the content of the Local Plan in relation to travellers. In summary it is proposed that the Local Plan carries forward a similar approach to the Traveller DPD and the Regulation 18 draft Local Plan by promoting the following traveller policies:

- Safeguarding authorised sites (existing and newly permitted), as Regulation 18 Local Plan policy H13;
- Providing for the intensification of existing authorised traveller sites, subject to appropriate criteria, as Regulation 18 Local Plan policy H14;
- Providing for the expansion of existing authorised traveller sites beyond the safeguarded area, subject to appropriate criteria, as Regulation 18 Local Plan policy H15;
- Continuing to allocate existing travelling showpersons' sites at The Nurseries, Shedfield, as Regulation 18 Local Plan policy H16 (Carousel Park no longer needs to be allocated for travelling showpersons' use following the recent appeal decision allowing mixed traveller use);
- Continuing to allocate land at Tynefield, Whiteley for gypsy traveller use and intensification to 30 pitches, aiming to bring this forward at the earliest opportunity, as Regulation 18 Local Plan policy H18;
- Continuing to include a general permissive policy setting out criteria for the development of traveller sites, as Regulation 18 Local Plan policy H12.

5.9. It is acknowledged that it will not currently be possible for the Local Plan to demonstrate a deliverable 5-year supply of gypsy traveller pitches or showpersons' plots. This may result in a 'tilted balance' towards granting consent for sites, although these should still be suitable in planning terms and consistent with PPTS and other Development Plan policies. This may assist in achieving additional 'windfall' provision at an early stage and could help to secure an adequate 5-year supply in the relatively short-term.

Appendix 1 – Letter Sent to Major Landowners (January 2024)

Dear xxx

You may be aware that Winchester City Council are undertaking a Local Plan Review. In the case that you have previously corresponded with other aspects of the review, we would like to thank you for your cooperation.

We are contacting all of our neighbouring Local Planning Authorities and all major landowners in the district and asking them if they are able to assist us with meeting accommodation needs for Gypsy and Travellers.

Gypsy and Traveller Accommodation Assessment (GTAA)

As part of the review of the Local Plan, Opinion Research Services (ORS) were appointed to prepare a Gypsy and Travellers Accommodation Assessment (GTAA) https://www.localplan.winchester.gov.uk/LibraryAssets/attach/112/2022-10-31-Winchester-GTAA-Final-Report.pdf. The current need considers unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, and movement from bricks and mortar. The GTAA identifies an overall need for:

- 115 pitches for Gypsy and Travellers that met the PPTS planning definition of a traveller
- 85 pitches for Gypsy and Travellers that at the time of preparing the GTAA did not meet the planning definition of a traveller
- 27 plots for Travelling Showperson's

In order to demonstrate at the Local Plan Examination that the Council have done all they can to meet the need in the GTAA, we ask you to consider the following:

- Whether the land available in your ownership would be appropriate for Gypsy and Traveller development
- The level of land available to potentially assist
- Timeline of availability
- The mechanism in which this would be delivered e.g., whether you would rent or sell the land

Please can you let us know whether you are able to assist in the Council's delivery of Gypsy and Traveller sites. It is fully appreciated that you may not be in a position to assist, and you have no legal obligation to do so; furthermore, this would not preclude you from the ability to develop land within the district in the future.

Our intention is to use any information that we do receive as evidence at the Local Plan Examination and any correspondence will therefore be in the public domain. If you would like more information on the plan review process or how the information you provide will be used, please contact either myself on the below details, or Adrian Fox (afox@winchester.gov.uk / 01962 848278) / Steve Opacic (Sopacic@winchester.gov.uk 01962 848101).

It would be very much appreciated if you are able to please respond by Friday 26 January 2024.

Yours sincerely

Adam Bennett
Strategic Planning Officer

Winchester City Council
Colebrook Street
Winchester, SO23 9LJ

Tel: 01962 848092

Appendix 2 – Responses From Major Landowners

Defence Infrastructure Organisation (MOD) (by email 4 January 2024)

RE: Winchester City Council Local Plan Review - Gypsy and Traveller Accommodation Needs

DO DIO ODC-Town Planning (MULTIUSER) [redacted]

Reply | Reply All | Forward | ...

To Adam Bennett

Thu 04/01/2024 13:34

Follow up. Start by 04 January 2024. Due by 04 January 2024.
You replied to this message on 05/01/2024 09:40.

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon Adam,

Thanks for your email below and attached letter. As you will be aware we have made representations to the emerging Local Plan regarding including a suitable policy for MOD sites which would cover such matters, should sites become available during the plan period. Nevertheless, I have written to DIO Land Management Service colleagues regarding whether any land in the district could be suitable and would be available. It is noted that your timescale for a response is quite short and you'll be aware that of course we have internal sign off requirements for any such releases and those can take time. If we haven't replied further within your timescale, you can presume that we will not be preparing a further input on this matter.

Take care & stay safe,

Stephen

Stephen J Barrington Harness BSc, MSc, ACM, Assoc RICS, FWCMT, FRTPI, Chartered Town & Country Planner

University of Winchester (by email 9 January 2024)

RE: [EXTERNAL] Winchester City Council Local Plan Review - Gypsy and Traveller Accommodation Ne...

Reply | Reply All | Forward | ...

MB Mark Butt [redacted]
To Adam Bennett; Enquiries
Cc Adrian Fox

Tue 09/01/2024 15:26

Follow up. Start by 09 January 2024. Due by 09 January 2024.
You replied to this message on 09/01/2024 15:48.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Adam,

Apologies for the delay in responding to the following queries.

- Whether the land available in your ownership would be appropriate for Gypsy and Traveller development
- The level of land available to potentially assist
- Timeline of availability
- The mechanism in which this would be delivered e.g., whether you would rent or sell the land

The very simple answer is that we have no land in our ownership which would be appropriate for such a use.

Kind regards,

Mark Butt MSc MProfBA MRICS
Head of Estates Capital Programme
University of Winchester
Sparkford Road, Winchester, SO22 4NR
[redacted]

Rookesbury Estate (by email 11 January 2024)

RE: Winchester City Council Local Plan Review - Gypsy and Traveller Accommodation Needs

Reply | Reply All | Forward | ...

Thu 11/01/2024 15:47

PH Paul Harris <[redacted]

To Adam Bennett

Cc Adrian Fox

Follow up. Start by 11 January 2024. Due by 11 January 2024.
You replied to this message on 11/01/2024 15:50.

Gypsy and Traveller Letter - Rookesbury Estate.docx
.docx File

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Bennett,

As the authorised managing agent of the Rookesbury Estate in Wickham, and under instructions from my client, I write in response to your electronic letter to them dated 8th January 2024 (copy attached).

Having considered the Council's requirement to provide Gypsy and Traveller sites, I can confirm that there are no such sites on the Rookesbury Estate that are either suitable or available at this time or in the foreseeable future.

I am sorry we cannot assist in this instance.

Yours sincerely.

Paul R Harris BSc(Hons) MRICS FAAV
For and on behalf of
Giles Wheeler-Bennett
CHARTERED SURVEYORS & LAND AGENTS
West Court
Lower Basingwell Street
Bishop's Waltham
Southampton
SO32 1AJ

Church Commissioners (by email 25 January 2024)

Winchester City Council Local Plan Review - Gypsy and Traveller Accommodation Needs

TS Tom Southgate [redacted]
To Adam Bennett

Reply | Reply All | Forward | ...
Thu 25/01/2024 16:51

Follow up. Start by 26 January 2024. Due by 26 January 2024.
You replied to this message on 26/01/2024 07:42.

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Adam,

Many thanks for your correspondence to my colleague Joanna Loxton, dated 3 January 23.

I have spoken with your colleague Steve Opacic this afternoon. We have reviewed our landholding and do not believe there to be any suitable opportunities at this point in time.

Should you wish to discuss any matters further related to the emerging Local Plan please do not hesitate to contact me.

Thanks,
Tom

Tom Southgate MRTPI
Senior Asset Manager (Strategic Land Investment)

Investment Division | Church Commissioners for England | Church House | Great Smith Street | London SW1P 3AZ
Direct Dial: [redacted]

O'Flynn Group (Sutton Scotney Estate) (by email 2 February 2024)

LICHFIELDS

The Minster Building
21 Mincing Lane
London EC3R 7AG

020 7837 4477
london@lichfields.uk
lichfields.uk

Adam Bennett
Strategic Planning Officer
Winchester City Council
Colebrook Street
Winchester
SO23 9LJ

By email only: ABennett@winchester.gov.uk

Date: 2 February 2024
Our ref: 15877/01/MS/RN/29042351v3

Dear Mr Bennett

Local Plan Review: Gypsy and Traveller Accommodation

We write in response to your letter of the 8th January 2024, regarding the current unmet need for gypsy and traveller pitches across Winchester District and the subsequent request as to whether the landowner of 'Land at Micheldever Station', is able to assist in helping to meet this unmet need.

As you will be aware, our client, O'Flynn Group continue to promote the 'Land at Micheldever Station' as a location for development. The area is part of the wider Sutton Scotney Estate and comprises the agricultural land around the existing train station and Micheldever Station village. You will also be aware the 'Land at Micheldever Station' (MI04) is assessed as suitable and 'deliverable/developable' within the Council's SHELAA; it is a relatively unconstrained area centred around the train station and is 'available' now.

We note that Carousel Park (Policy TR3) is identified and allocated as a Travelling Showpersons site, and sits c.500m to the east of the Sutton Scotney Estate boundary. We also note that Policy CP5 of the Council's Local Plan indicates that Gypsy and Traveller sites *"should be well related to existing communities to encourage social inclusion and sustainable patterns of living..."*

In that context, it is recognised that the identification of land at Micheldever Station could theoretically enable the Council to allocate additional gypsy and traveller plots to meet such a need.

However, our clients consider this would only be suitable and appropriate as part of a holistically planned new community at Micheldever Station. This would provide improvements and access to infrastructure, including in respect of roads, public transport, schools, GP surgeries etc. Such provision would in turn support the housing needs of all parts of the community, including serving the infrastructure and social needs a gypsy and traveller site in this area would necessitate, as per the principles above (e.g. providing social inclusion and sustainable patterns of living).

In specific response to your request, O'Flynn Group would, in principle, be amenable to considering the accommodation of some Gypsy & Traveller provision as an element of a wider allocation for a new settlement at Micheldever Station, to contribute towards mixed and balanced communities. Without

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such a comprehensive allocation for strategic scale development at Micheldever Station, we do not consider the 'Land at Micheldever Station' is suitable to accommodate a stand-alone or isolated Gypsy & Traveller site and would not be willing to provide land for such a use.

We are aware of examples in other parts of the country where such an approach – providing for Gypsy and Traveller needs as part of larger strategic allocations for new homes – has been implemented, for example:

- The Mid Devon Local Plan (2020) provided gypsy and traveller pitches by way of its larger housing sites including Tiverton East Urban Extension (c.1,800 homes), North West Cullompton (c.1,350 homes), East Collumpton (c.1,750 homes) and Pedlerspool (200 homes). As part of this it commissioned research specifically on the challenges of accommodating Gypsy and Traveller provision as part of urban extensions[1], broadly concluding that provision as part of urban extensions and new settlements was one effective way of planning for needs, and that viability and deliverability was not likely to be affected by such an approach.
- Brentwood Borough Council's Local Plan (2022) included the allocation of Dunton Hills Garden Village (3,700 homes) with a requirement for a minimum of five serviced Gypsy & Traveller pitches to be included within the Garden Village and delivered within the first five years. Outline planning permission was approved, including for the pitches, in December 2023.
- In Reigate & Banstead its Development Management Plan (2019) provided for future Gypsy and Traveller needs by providing pitches within the Plan's proposed 'sustainable urban extensions' (ranging from 70 up to 300 homes in total size), the Plan Inspector finding that the *"allocation of pitches on the SUEs forms an appropriate and justified strategy"*.

It is clear that by pursuing such a strategy, Winchester City Council could further meet more of its Gypsy and Traveller needs. If a Gypsy and Traveller site were to be identified as a requirement of part of a wider strategic allocation at 'Land at Micheldever Station', we have initially reviewed the land holding and consider:

1 there is a sufficient quantum of land to provide options for proportionate forms of provision for Gypsy and Traveller pitches;

2 comprehensive development informed by a masterplan could enable the gypsy and traveller provision to be integrated into a sustainable form of development, whilst minimising tension with the settled community (i.e. it can be properly specified, located, designed and landscaped);

3 any wider strategic allocation would provide new local services such as schools, heath and community services, avoiding the need for such provision to place a burden on existing local facilities;

4 such a spatial approach to provision would provide a greater emphasis on good public transport/active travel connectivity rather than locating provision within isolated locations.

If such a spatial approach were pursued – utilising a large scale allocation at Micheldever Station within the Winchester Local Plan to also deliver Gypsy and Traveller needs – O'Flynn Group would explore

[1] https://www.middevon.gov.uk/residents/gypsies-and-travellers/lga-funded-research-on-gypsy-and-traveller-sites-completed-for-the-council/

mechanisms and routes to delivery (e.g. partnering with the Council, a registered provider or a specialist provider/management company). Notwithstanding, in practice we consider a workable approach would be achievable in the context of wider delivery of the allocation.

Wider Development

You will be aware from our previous representations in respect of 'Land at Micheldever Station' that – as well as contributing towards Winchester's unmet need for Gypsy and Traveller pitches – we continue to believe the site has a role to play in meeting the wider housing needs of Hampshire. As we have previously raised at both committee meetings of the Partnership for South Hampshire (PfSH) and Winchester Cabinet, there is a significant level of unmet housing need across the wider PfSH area and which is acknowledged within the latest PfSH Spatial Position Statement (December 2023). Whilst the PfSH has attempted to locate additional areas of growth through a piece of work which has looked at the broad areas of search across South Hampshire, there is still a significant shortfall in addressing this unmet need, even if these broad areas could deliver the level of housing that has nominally been assigned to them.

The release of land at Micheldever Station for housing would therefore free up existing allocated growth around North Whiteley and West of Waterlooville to be repurposed back towards its original role of meeting the needs of PfSH (and not the rest of Winchester), providing the ability for Winchester to assist the PfSH in meeting its full quantum of unmet need.

The release of land at Micheldever Station would appear to provide an excellent opportunity to both assist the Council in meeting the wider unmet housing need as well as addressing the local need for gypsy and traveller pitches. We would be happy to discuss any aspect of this further with the Council, including on what specifically Micheldever Station could offer in response to the varied housing and accommodation needs identified by the Council.

Yours sincerely

[redacted]

Martin Taylor
Planning Director
BSc (Hons) MSc MRTPI MIED

Appendix 3 – Letter Sent to Neighbouring LPAs and Hampshire County Council

Dear xxx

Thank you for your cooperation so far with the Winchester City Council Local Plan Review. As you know, the Council has a statutory duty under the Planning and Compulsory Purchase Act 2004 (as amended) to maintain an up-to-date Local Development Scheme (LDS) which currently states that the Council are due to consult upon the Regulation 19 document this year. Unfortunately, this timeline is no longer achievable due to a number of factors that are outside of the Council's control. Reasons for this have been set out within a recent Cabinet report and described in recent press release that can be found here: Local Plan timetable reviewed and work outlined to produce a sound plan - Winchester City Council

On the 10 August, our Members resolved to amend the timetable for the Local Plan review[1] consequently adjusting the Regulation 19 consultation timing until quarter 2 of 2024. The updated timetable can be found in Appendix 2 of the following link to the Cabinet report: https://democracy.winchester.gov.uk/documents/g4402/Public%20reports%20pack%20 10th-Aug-2023%2010.00%20Cabinet%20Committee%20Local%20Plan.pdf?T=10) – issues concerning Gypsy and Travellers and the Duty to Cooperate/Statement of Common Ground highlighted by PINS during a Local Plan advice meeting are outlined below.

Gypsy and Traveller / Travelling Showpeople (GTTS) Accommodation

One particular issue the Council wishes to address is that of Gypsy and Traveller accommodation need. As part of the previous Local Plan, a Gypsy and Traveller DPD[2] was prepared in order to support policy on site delivery within the district. Though helpful in accommodating the assessed need through safeguarding, expansion, and allocation of sites, the document and evidence base used to inform the need has since undergone an update (due to the passage of time) to support the Local Plan review. In

[1] https://democracy.winchester.gov.uk/documents/g4402/Decisions%2010th-Aug- 2023%2010.00%20Cabinet%20Committee%20Local%20Plan.pdf?T=2

[2] https://www.localplan.winchester.gov.uk/LibraryAssets/attach/130/_rebrandGypsy-and-Traveller-DPD-adoption- version-11-.pdf

addition to this, a key piece of the evidence base to establish need, that has been updated, is the Gypsy and Traveller Accommodation Assessment.

Gypsy and Traveller Accommodation Assessment (GTAA)

As part of the review of the Local Plan, Opinion Research Services (ORS) were appointed to prepare a Gypsy and Travellers Accommodation Assessment (GTAA)[3]. The GTAA breaks down the overall GTTS need into 4-year bands. The current need takes into account unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households and movement from bricks and mortar in the first 4 years. The total net new household formation is then applied proportionately across the remaining 4-year bands. The GTAA identifies an overall need for:

- 115 pitches for for Gyspy and Travellers that met the PPTS planning definition of a traveller
- 85 pitches for Gypsy and Travellers that at the time of preparing the GTAA did not meet the planning definition of a traveller
- 27 plots for Travelling Showperson's

Gypsy and Traveller Pitch Deliverability Assessment

ORS were also appointed to prepare a Pitch Deliverability Assessment (PDA)[4] with the objective to provide advice on the suitability, availability, and achievability of any existing private Gypsy and Traveller sites (with permanent planning permission) to assist in meeting the identified accommodation needs (as outlined above) for Gypsies and Travellers.

The PDA recommended a potential solution to meet the need for circa. 20 additional pitches is via intensification/expansion; this could be achieved through either site allocation or could come forward as windfall development. It is assumed that the remainder of the need (i.e., the assessed need of those meeting the definition within the PPTS) could be delivered through the windfall process. The Council have also carried out a number of Call for Sites exercises, resulting in only a single site that unfortunately, does not appear to have significant development potential.

Definition of *Gypsy, Travellers, and Travelling Showpeople*, PINS Advice, and Unmet Need

The recent *Smith* decision by the Court of Appeal which determined that the planning policy definition of Gypsies and Travellers discriminates against disabled and elderly members of the community[5] has led the Council to seek advice from the Planning Inspectorate as part of a Local Plan review advisory session. Although the decision runs

[3] https://www.localplan.winchester.gov.uk/LibraryAssets/attach/112/2022-10-31-Winchester-GTAA-Final- Report.pdf

[4] https://www.localplan.winchester.gov.uk/LibraryAssets/attach/113/2022-10-31-Winchester-Pitch-Deliverability- Assessment-Final-Report.pdf

[5] Lisa Smith v Secretary of State for Levelling Up, Housing & Communities & Anor. - Find case law (nationalarchives.gov.uk)

contrary to the definition set out within Annex 1 of the PPTS[6] (notwithstanding para. 134 of the judgement confirms the decision relates specifically to the case and does not amend the current definition) no further guidance update has been published. The Council understands from speaking to the *Department of Levelling up, Housing and Communities* that Ministers are currently considering their response to the judgement. Should an amendment occur to the existing definition of Gypsy and Travellers to align with the *Smith* decision, the Council will review the implications of this as necessary.

Based on advice received from an Inspector at the recent PINS Advisory meeting, the Council is aiming to assess the impact of the court decision in terms of overall need and will need to be able to demonstrate at the examination how all potential sources of supply have been exhausted. The Inspector further advised the Council to raise this matter with neighbouring authorities to establish if they might be willing or able to take some of the unmet Gypsy and Traveller need through the Duty to Cooperate.

Consequently, the Council requests your response under the Duty to Cooperate on whether your authority might be in a position to assist with meeting the need set out within the GTAA given that the Council is currently unable to identify how this need can be met. For this purpose, it would be helpful to consider the following:

- Whether your authority is in a position to assist, and the mechanism through which this could be delivered
- If your authority is able to assist in meeting some of the Council's Gypsy and Traveller need, how much of this need would it be able to deliver
- Details of suitable sites in your plan area to meet the need, and a possible timeline for delivery
- The stage you are at in the plan-making process

The Council requests that you review the above information and respond accordingly confirming your authority's position and whether it is able to assist in the Council's delivery of Gypsy and Traveller sites. It is appreciated that your authority may not be in a position to do so but given the Duty to Cooperate requirements including the demonstration of the soundness test that will allow the Council to proceed to the examination of the Local Plan, could you please provide appropriate evidence (such as land availability assessments) to sufficiently demonstrate why your authority cannot assist.

Duty to Cooperate and Statement of Common Ground (SoCG)

You will be aware that under the Duty to Cooperate requirements, the Council must engage with neighbouring authorities on strategic cross-boundary matters, looking to resolve these through a Statement of Common Ground. The Council has entered into a number of SoCG with different authorities and is in the process of reviewing these to establish their appropriateness. In the event that the existing SoCG is adequate, it would be necessary in order to meet Duty to Cooperate obligations, to note that meetings have taken place and that both parties agree to the adequacy of the existing SoCG (in the context of the passage of time), with other SoCG requiring an update.

[6] Title (publishing.service.gov.uk)

The Council is therefore going to contact you shortly with proposed dates to set up Duty to Cooperate meetings with the intention of entering into a SoCG.

The Council would like to work with you in a constructive manner to identify a list of matters and help us to identify any issues that you feel would be appropriate to be included in the SoCG. Further to this, it would be appreciated if you could provide contact details for the relevant officer leading on your Duty to Cooperate.

The Council appreciates your assistance in these matters and would like to thank you in advance for your response. It is requested that a response is received by Monday September 11.

Should you have any issues with the above, or would like to discuss matters prior to meeting, please do get in touch with either myself or Adrian Fox (Afox@winchester.gov.uk / 01962 848278).

Yours sincerely

Adam Bennett
Strategic Planning Officer

Winchester City
Council Colebrook
Street Winchester,
SO23 9LJ

Tel: 01962 848092

Appendix 4 – Neighbouring LPA responses

Basingstoke and Deane Borough Council

From: Joanne Brombley [redacted]
Sent: Thursday, August 24, 2023 12:03 PM
To: Adam Bennett [redacted]
Cc: Adrian Fox [redacted]
Subject: FW: LPA Duty to Cooperate / Gypsy and Traveller accommodation

> **Caution:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Adam

Thank you for your email regarding duty to Co-operate and gypsy and traveller accommodation. Your letter is helpful in setting out the current position with regards to such accommodation. In your letter you ask a number of specific questions which I respond to below.

The letter specifically asks whether, under the Duty to Cooperate, Basingstoke and Deane Borough Council might be in a position to assist with meeting the need set out within the GTAA given that Winchester City Council is currently unable to identify how this need can be met. I can confirm, in response, that the council is not in the position to assist given the current level of need within this borough and the availability of suitable sites to accommodate such need.

We are currently in the early stages of updating the adopted Basingstoke and Deane Local Plan (2011-2029) and are aiming for consultation on a draft Plan (Regulation 18) in January 2024. In order to inform this review process we have also commissioned consultants ORS to update the Gypsy and Traveller Accommodation Assessment (GTAA). This is currently underway but has not yet been published. Work to date indicates that the need for pitches in the borough has increased significantly since the last GTAA was completed. The borough therefore has a significant need of its own to meet. Based on the currently published GTAA, the council can not currently show a 5 year supply of sites and therefore is already in the position of determining planning applications and facing appeals without a 5 year supply. The current strategy of allocating pitch provision on larger greenfield housing sites is being implemented but is taking time to deliver. A call for sites was conducted to inform the Local Plan Update and this failed to identify any suitable sites for such provision. As such, the council is in a similar position to yourselves in having to identify a suitable strategy through its Local Plan to accommodate high levels of need with very limited opportunities. Given the challenges with meeting our own needs the council is not in a position to assist the needs of neighbouring areas. Once the updated GTAA has been published I will forward this on.

Please just let me know when you would like to arrange the next duty to co-operate meeting to inform any relevant statements.

Kind regards
Joanne

Joanne Brombley
Planning Policy Manager
Sent: Tuesday, January 2, 2024 2:50 PM
To: Adam Bennett [redacted] Joanne Brombley [redacted]
Cc: Adrian Fox [redacted]
Subject: RE: Draft SoCG

> **Caution:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good afternoon Adam,

Hope you've had a good Christmas. Thank you for your email relating to the Statement of Common Ground.

As the Basingstoke and Deane GTAA is still to be finalised and published we are relying on emerging findings which suggest the need has increased significantly. Whilst we have undertaken a call for sites which failed to identify any suitable sites, once needs have been identified further work will be completed to look at all possible strategies to accommodate these needs. I have re-attached the document with some amended suggested wording.

With regards to nutrients/climate change, whilst we didn't identify these matters specifically in our meeting, we did touch on these areas and we thought it might be beneficial to include. Happy for you to take a call either way on this. I've copied the wording we've included in our SoCG with East Hampshire below for your information.

EHDC declared a climate emergency in July 2029 and adopted a climate and environment strategy in 2020 which is currently being refreshed. BDBC declared a climate emergency in September 2019 and adopted a climate change and air quality strategy in 2021. Both authorities will continue to engage and co-operate to meet respective targets.
Where new development increases the amount of nutrients entering Solent European Sites. Natural England has advised that there is a likely significant effect on several of the Solent's European Sites from development. Therefore, any new housing schemes and other proposals which are within the River Itchen catchment and include a net gain in overnight accommodation or development which has a high volume of water use will need to prevent any increase in nutrients into the Solent European Sites in order for them to 'nutrient neutral'. Both authorities are continuing to work with PfSH through the Water Quality Working Group to coordinate a Solent wide solution in the medium to long term.

I look forward to hearing from you.

Kind regards
Vashti

East Hampshire District Council

From: Stevens, Heather [redacted]
Sent: Monday, August 21, 2023 1:53 PM
To: Adrian Fox [redacted]
Subject: East Hampshire Local Plan: Duty to Co-operate Provision of Traveller and Travelling Showpeople accommodation

Dear Adrian

Hope you are well. I am emailing in response to the letter we received from your team regarding assisting with meeting the need for Traveller accommodation in Winchester. It was a very timely letter, as I was just about to send out a very similar letter to our neighbours. Below is what was drafted to send to you - with attachment - and what has been sent to all of our neighbours, including the SDNP.

I think the letter should give you the answers to your questions. In summary, we are not in position to assist, as we find ourselves in a very similar situation. I hope the information in this documents and links provide the evidence you need. We are scheduled to consult on a draft Local Plan (Reg18) in January 2024.

I appreciate that clearly you are equally not in a position to assist us, but if you could respond to this email to confirm receipt, that would be helpful.

We are happy to discuss a SCG, as we will be looking to confirm some wording around Oct time, ahead of our consultation in Jan.

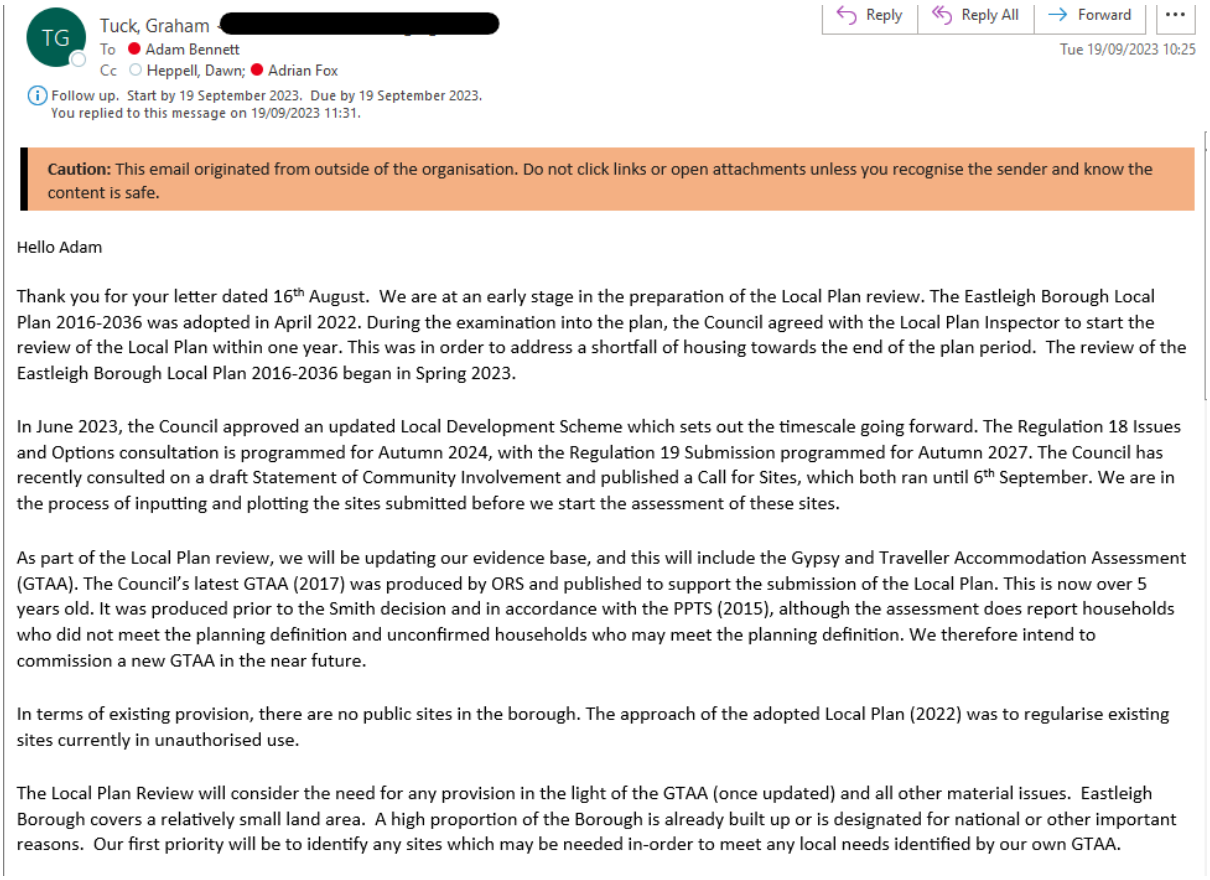
Happy to discuss anytime.

Thanks, Heather.

Heather Stevens

Principal Planner, Planning Policy

Eastleigh Borough Council



TG

Tuck, Graham [redacted]
To Adam Bennett
Cc Heppell, Dawn; Adrian Fox

Reply | Reply All | Forward | ...
Tue 19/09/2023 10:25

Follow up. Start by 19 September 2023. Due by 19 September 2023.
You replied to this message on 19/09/2023 11:31.

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Hello Adam

Thank you for your letter dated 16th August. We are at an early stage in the preparation of the Local Plan review. The Eastleigh Borough Local Plan 2016-2036 was adopted in April 2022. During the examination into the plan, the Council agreed with the Local Plan Inspector to start the review of the Local Plan within one year. This was in order to address a shortfall of housing towards the end of the plan period. The review of the Eastleigh Borough Local Plan 2016-2036 began in Spring 2023.

In June 2023, the Council approved an updated Local Development Scheme which sets out the timescale going forward. The Regulation 18 Issues and Options consultation is programmed for Autumn 2024, with the Regulation 19 Submission programmed for Autumn 2027. The Council has recently consulted on a draft Statement of Community Involvement and published a Call for Sites, which both ran until 6th September. We are in the process of inputting and plotting the sites submitted before we start the assessment of these sites.

As part of the Local Plan review, we will be updating our evidence base, and this will include the Gypsy and Traveller Accommodation Assessment (GTAA). The Council's latest GTAA (2017) was produced by ORS and published to support the submission of the Local Plan. This is now over 5 years old. It was produced prior to the Smith decision and in accordance with the PPTS (2015), although the assessment does report households who did not meet the planning definition and unconfirmed households who may meet the planning definition. We therefore intend to commission a new GTAA in the near future.

In terms of existing provision, there are no public sites in the borough. The approach of the adopted Local Plan (2022) was to regularise existing sites currently in unauthorised use.

The Local Plan Review will consider the need for any provision in the light of the GTAA (once updated) and all other material issues. Eastleigh Borough covers a relatively small land area. A high proportion of the Borough is already built up or is designated for national or other important reasons. Our first priority will be to identify any sites which may be needed in-order to meet any local needs identified by our own GTAA.

Our Local Plan Review is at an early stage. However, given the situation in the Borough as outlined above, I consider it is unlikely that the Borough would have the capacity to accommodate some of the needs arising from your GTAA.

We will of course be happy to continue to discuss our respective Local Plan Reviews as they progress.

Regards

Graham Tuck
Planning Policy Manager
Corporate Leadership Board - Planning Policy

Fareham Borough Council

FAREHAM
BOROUGH COUNCIL

Mr Adam Bennett
Winchester City Council

By email to [redacted]

Interim Head of Planning Strategy
Kirstin Clow

Contact: Kirstin Clow
Ext.: [redacted]
Date: 12 September 2023

Dear Mr Bennett

Winchester Local Plan Review

I write in reference to your letter of 16th August 2023 regarding Gypsy and Traveller / Travelling Showpeople (GTTS) Accommodation. This requested a response under the Duty to Cooperate on whether Fareham might be able to assist with meeting the need set out within your Gypsy and Traveller Accommodation Assessment (GTAA) (Oct 2022), given that Winchester is currently unable to identify how this need can be met within the Boroughs boundaries.

This need is provided below for reference:

- 115 pitches for Gypsy and Travellers that met the PPTS planning definition of
- a traveller
- 85 pitches for Gypsy and Travellers that at the time of preparing the GTAA did
- not meet the planning definition of a traveller
- 27 plots for Travelling Showpersons

The Inspector at your PINS Advisory meeting advised the Council to raise this matter with neighbouring authorities to establish if they might be willing or able to take some of the unmet Gypsy and Traveller need.

You have requested that we consider the following:

- The stage you are at in the plan making process
- Whether your authority is in a position to assist, and the mechanism through which this could be delivered.
- If your authority is able to assist in meeting some of the Council's Gypsy and Traveller need , how much of this need would it be able to deliver
- Details of suitable sites in your plan area to meet the need, and a possible timeline for delivery

Planning and Regeneration, Civic Offices
Civic Way, Fareham PO16 7AZ
Tel: 01329 236100
Answerphone: 01329 82463 [redacted]
Keep up to date with our latest news: like Fareham on Facebook
and follow @FarehamBC on Twitter

Set out below is a response to each of these questions.

The stage you are at in the plan making process

Fareham Borough Council adopted its Local Plan on 5th April 2023. Therefore, it is considered we have an up-to-date Local Plan. There is currently no Local Plan review scheduled. This position informs all the responses provided below.

Whether your authority is in a position to assist, and the mechanism through which this could be delivered

One site was allocated in the Fareham Local Plan 2037 to meet the need identified in Fareham by the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) for Hampshire (2017).

The adopted Fareham Local Plan 2037 also contains Policy HP11 Gypsies, Travellers and Travelling Showpeople, which is supportive of any sites that may come forward that meet the requirements set out in the Policy.

It was agreed by both Fareham Borough Council and Winchester City Council in a Statement of Common Ground (SoCG) dated 20th August 2021, that given there were no further promoted sites during the preparation of the Fareham Local Plan 2037, Policy HP11 in the newly adopted Plan would be a suitable approach in contributing to accommodating any future need from Winchester City Council.

If your authority is able to assist in meeting some of the Council's Gypsy and Traveller need, how much of this need would it be able to deliver

The inclusion of the criteria-based policy HP11 in the Fareham Local Plan would be the only way the Council would be able to assist Winchester in meeting some of the unmet Gypsy and Traveller need.

However, there is no mechanism to quantify how much of the unmet need this would deliver for the purposes of plan making.

Details of suitable sites in your plan area to meet the need, and a possible timeline for delivery

The Council adopted its Local Plan on 5th April 2023 and there is currently no Local Plan review scheduled. There is, as a result, no opportunity within the timeframe of Winchester's Local Plan preparation for Fareham to revaluate sites for Gypsy and Traveller accommodation.

Any suitable sites that may come forward through windfall for Gypsy and Traveller Pitches will be assessed and judged against Policy HP11in the adopted Fareham Local Plan 2037.

Fareham Borough Council recognises the challenge that Winchester face in meeting the identified Gypsy, Traveller and Travelling Showpeople need within the district. However, for the above reasons, the Council is not in a position to be able to assist Winchester in

meeting the identified Gypsy and Traveller need beyond the implementation of Policy HP11.

We hope the above is helpful to set out our position and provides sufficient detail on the Fareham position. However, the Council is open to meeting to discuss the existing SoCG between the two councils and to continuing to work together under the Duty to Cooperate obligations.

We wish you well in preparing your plan.

Yours sincerely

[redacted]

Kirstin Clow
Interim Head of Planning Strategy

Havant Borough Council

RE: Gypsy and Traveller unmet need response

EJ

Ellis, Jade [redacted]
To Adam Bennett; David.hayward
Cc Adrian Fox; Steve Opacic

Reply | Reply All | Forward | ...
Thu 04/01/2024 13:54

Follow up. Start by 04 January 2024. Due by 04 January 2024.
You replied to this message on 04/01/2024 14:52.

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Hi Adam

I'm very well thank you. I hope you're well and enjoyed a lovely Christmas.

Apologies for not responding to you sooner on this matter. Our GTAA is in the final stages of a draft which confirms that our need is effectively met by the existing permission, and there is no new arising need over the plan period.

In terms of our ability to assist with the need for meeting GTAA – this is likely be challenging. As you know from our emerging Constraints Study, Havant Borough is constrained which will significantly limit our ability to meet general housing need. As such, we are unable to assist in addressing the unmet need arising within Winchester District at this time.

Please let me know if you have any queries or wish to discuss at all.

Many thanks, Jade

Jade Ellis

Principal Planning Policy Officer [redacted]
Planning Services, Havant Borough Council, Public Service Plaza, Havant, PO9 2AX

Portsmouth City Council

RE: Gypsy and Traveller correspondence

Reply | Reply All | Forward | ...

Tue 19/12/2023 16:22

BG

Bernadt, Gillian [redacted]

To Adam Bennett

Cc Adrian Fox; Steve Opacic; Howard, Lucy; Bell, Tom

Follow up. Start by 19 December 2023. Due by 19 December 2023.
You replied to this message on 20/12/2023 08:10.

- Official Sensitive -

Dear Adam,

Thanks for below. Further to your email and to update PCC's response on Gypsies and Travellers sent to you on 16 August 2023, our Gypsy and Travellers Accommodation Assessment (GTAA) has now been updated and concludes that there is no identified need for permanent or transit pitches or plots over Portsmouth Local Plan's plan period, to 2040. It remains the case that due to the extremely constrained land supply within its boundaries, Portsmouth is unable to meet any of Winchester's unmet need for gypsies and travellers pitches.

In terms of evidence to robustly demonstrate this, the Council's Call for Sites was undertaken in Winter 2021/22 and represents the most recent and robust position of land being actively promoted in the City. Of 15 new sites submitted for residential, employment, retail and town centre and community uses, none promoted accommodation for Gypsies and Travellers.

The City's draft HELAA has undertaken a comprehensive assessment of land available and suitable for housing and employment development, giving consideration to all potential sources of supply. This thorough assessment identifies an indicative supply of 680 dwellings per annum, which is a way (219 units pa) below objectively assessed need (using the standard method) of 899, as outlined in HEDNA (final draft). As you're aware from our meeting on 7 December, under the Duty to Cooperate PCC have asked whether Winchester can help Portsmouth in meeting its unmet housing need (taking amount the 800 dwelling contribution secured through adoption of Havant's Local Plan) and will be formalising this is a forthcoming letter. In this respect

The HELAA identifies availability of land to support employment floorspace, which feeds into the draft Local Plan's supply driven target of 156,883sqm office, R&D, industrial and warehousing floorspace, which meets the need identified for employment uses as identified in the HEDNA. There is a small over-supply in office floorspace, which is in part due to the flight to quality for office space and an expected return to office usage in future. This is on land proposed (through allocations) for employment use, and would be unsuitable for gypsy and traveller accommodation. Further detail re employment land supply and need will be provided in the Statement of Common Ground.

Finally, to ensure full consideration of land supply, consideration could be given to open space. Portsmouth's urbanised character and high population densities inform the draft Local Plan's strategic approach and objective to protect open space and green infrastructure. This is imperative to enable mitigation and adaption to climate change, protect biodiversity in line with various nature conservation designations ((SPA, RAMSAR, SAC, SSI and SINC and local nature reserve) and to meet the recreational needs of the City's growing population. The draft plan highlights, based on the Green Instructure background paper (https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf) deficiencies in most open space typologies, which is expected to increase as the population grows. Green Infrastructure standards are set out in the draft Local Plan to positively contribute to green infrastructure provision and help alleviate deficiencies. Therefore, in addition to the land assessed through HELAA, the City's Green Infrastructure and open space are considered highly unsuitable to meet Winchester's unmet need for gypsies and traveller pitches.

Please note that much of the evidence referred to above is at final draft stage, and we can make this available when these studies/ reports are complete.

Kind regards,
Gillian

Gillian Bernadt | Principal Planning Policy Officer
Directorate of Regeneration | City Development - Planning Policy
Portsmouth City Council | Civic Offices | Guildhall Square | Portsmouth | PO1 2AL
[redacted]

South Downs National Park Authority

25 August 2023

Adam Bennett
Planning Policy
Winchester City Council

By email only

Dear Adam

Winchester Local Plan: Duty to Co-operate Provision of Traveller and Travelling Showpeople accommodation

Thank you for your letter dated 16 August 2023 updating us on the timeline for the review of your Local Plan and potential unmet needs for Traveller and Travelling Showpeople accommodation.

The SDNPA is at the early stages of starting its Local Plan Review (LPR). The timetable for the Local Plan Review was most recently agreed at our full National Park Authority meeting on 14 December 2022. Evidence of the need for Traveller and Travelling Showpeople within the SDNP is covered by several Gypsy and Traveller Accommodation Assessments prepared jointly with district councils. We are currently reviewing where GTAAs need updating and will shortly be commissioning a study to inform the preparation of the Local Plan Review covering the plan period 2022 to 2042. In addition, a call-for-sites for development, including sites for Traveller and Travelling Showpeople was carried out in Summer 2022. A small number of sites were submitted, and these will be assessed as part of our forthcoming Land Availability Assessment.

Paragraph 176 of the NPPF states that national parks have the highest status of protection in relation to landscape and scenic beauty. It also states that the scale and extent of development within all these designated areas should be limited. Furthermore, Section 62 of the Environment Act 1995 requires all relevant authorities, including Winchester City Council, to have regard to the purposes of the National Park. It is therefore unlikely that the South Downs National Park will be able to accommodate any unmet need arising in Winchester District outside the National Park, indeed Planning Practice Guidance[1] states National Parks are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas..

The Winchester GTAA (2022) includes the SDNP and identifies no need for pitches for households that met the planning definition and a need for 5 pitches for households that did not meet the planning definition for Gypsy and Traveller. The GTAA also identifies a need for 8 plots from Travelling Showpeople households that met the planning definition. No additional pitches or plots have been permitted in SDNP within Winchester District since the GTAA.

[1] Paragraph: 041 Reference ID: 8-041-20190721

In addition to the points above regarding the early stage of the Local Plan Review, in relation to Traveller provision, we advise that any applications submitted in the SDNP will be determined in accordance with Policy SD33 (Gypsies, Travellers and Travelling Showpeople), plus other relevant policies in the South Downs Local Plan.

We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes and will work with you to agree an appropriate Statement of Common Ground in due course. In the meantime, we wish you well with the progression of your Local Plan and if you have any questions on the content of this letter, please do not hesitate to contact me.

Yours sincerely

[redacted]

Claire Tester
Planning Policy Manager

Contact:
Amy Tyler-Jones
Planning Policy Lead
[redacted]

Test Valley Borough Council

Test Valley Borough Council

Adam Bennett
Strategic Planning Officer
Winchester City Council

Planning and Building Service
Beech Hurst
Weyhill Road
Andover, Hants SP10 3AJ
Telephone 01264 368000
Minicom 01264 368052
Web site www.testvalley.gov.uk

Contact: Clare Roberts
Telephone: [redacted]
E-mail: planningpolicy@testvalley.gov.uk
Your ref:
Our ref:
Date: 1st November 2023

Dear Adam,

Thank you for your letter dated 16th August providing an update on the timescale of the Winchester Local Plan Review, Duty to Cooperate request regarding helping to meet gypsy, traveller and travelling showpeople needs and progression of a Statement of Common Ground. We welcome opportunities to engage and collaborate with Winchester City Council (WCC) on strategic planning matters, policies and cross boundary issues.

Test Valley are also currently in the process of preparing a new Local Plan that covers the period 2020 to 2040. We undertook public consultation on our Regulation 18 (Stage 1) Plan 2040 for Test Valley Borough early in 2022 and we are currently preparing our draft Regulation 18 (Stage 2) Plan 2040. The Regulation 18 (Stage 2) Plan 2040 will include the need for gypsy, travellers and travelling showpeople for Test Valley and identify how we are seeking to address this need. We have undertaken an updated Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2021) to inform our needs and we have an up to date Gypsy & Traveller pitch and Travelling Showpeople plot supply statement (2023).

The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2021 demonstrates the need in Test Valley has significantly increased to 47 pitches for Gypsies and travellers and 25 yards for Travelling Showpeople for 2020 to 2036. The current five year position is set out within the Gypsy & Traveller pitch and Travelling Showpeople plot supply statement (2023), and demonstrates Test Valley does not have a five year supply of pitches or yards. The position for Gypsies and Travellers is 1.1 years and for Travelling Showpeople is 0 years. The Regulation 18 (Stage 2) Plan will identify our draft approach for meeting these needs which will include assessing the capacity and site deliverability of permanent sites, whether existing sites could have small scale extensions and to consider sites promoted through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Reflecting the planning constraints at our existing sites and the very limited number of sites promoted through the SHELAA, it is going to be a challenge to meet our own needs. Therefore reflecting this, Test Valley Borough Council will not be able assist in meeting Winchester's needs.

We welcome further and continuing engagement with WCC on our respective emerging Local Plans. Please contact Clare Roberts ([redacted] - Planning Policy Manager) and Leah Pearce [redacted] - Administrative Assistant) in regards to Duty to Cooperate meetings.

We look forward to continuing our engagement on our emerging local plans.

Yours faithfully,

Clare Roberts

Planning Policy and Economic Development

Hampshire County Council

RE: Infrastructure Delivery Plan and Duty to Cooperate

HE Howbrook, Emily <[redacted]>
To Adam Bennett
Cc Adrian Fox; Massie, Neil

Reply | Reply All | Forward | ...
Fri 15/09/2023 17:55

Follow up. Start by 18 September 2023. Due by 18 September 2023.
You replied to this message on 18/09/2023 09:57.

Winchester City Council local plan
Outlook item

Policy Doc..doc
.doc File

WCC Broadband.png
.png File

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Morning Adam

As an update, I need to chase up a number of colleagues, but so far I can advise as follows:

Education- Gemma Bowry has provided a detailed analysis of the district's schools baseline (capacity, pressure etc) as part of previous engagement. She will review and let you know if anything has changed.

HCC land and capital programme

Mark Biles has updated me on info sent to WCC in July regarding the plan for adult care assets (see attached).

Broadband

My colleague Dani has mapped the data available to us on broadband speeds- any questions about the data please contact [redacted] the Broadband Programme Director. Dani has done a few very simple maps to show overall broadband speeds and the properties included in the procurement. If you require different maps, just let me know. See attached plan and if you want the raw data let me know. My advice on understanding the planned masts and other mobile network operators infrastructure is to consult your planning team's register of permissions. I'm afraid we do not currently monitor this data.

Gypsy and Traveller Accommodation Needs

See attached advice on policy. There is no toleration for any Unauthorised Encampments on HCC land, Highways verges in the WCC area be it allocated or unallocated. Dependent on any welfare issues identified, repossession action will be instigated shortly after arrival.

My colleagues in assets have appraised HCC land - the contact is Mark Biles. The search was to reveal potential land that could be suitable for Gypsy Traveller or Travelling Show People accommodation. As a result of this work and consultation with Barry Jordan-Davis in estates management, no suitable sites have been identified for this purpose. A number of sites were either surplus or non-operational but the appraisal showed them to be either too small, constrained (e.g. floor risk zone or SINC close by) or limited access.

Transport- Public Right of Way

Laura Boyns and Phil Millard in countryside have identified projects that would benefit from infrastructure funding (Hampshire Countryside Service). They are 3 projects that due to lack of funding have not been carried out, and the need for which grow with WCC district population:

- Circular link project – incorporating the Meon Valley Trail, Welborne and Southdowns Way.
- The Knowle to Titchfield bridleway link – also near Welborne – WCC/FBC border
- The Otterbourne/Colden Common to Shawford link

Please treat as confidential because of landowner considerations and the permissions required before projects can be worked up and ratified.

Would you like to meet soon to discuss some of this more widely as I am currently finalising the HCC-wide developer infrastructure contributions guidance? I work full time so let me know when works best for you.

Emily

Emily Howbrook MRTPI AssocRICS CertCIH
Strategic Planning Manager