



MEETING THE ACCOMMODATION NEEDS OF GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE BACKGROUND PAPER

FOR THE PURPOSES OF LOCAL PLAN REGULATION 18
CONSULTATION, NOVEMBER 2022 - JANUARY 2023



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EAST HAMPSHIRE LOCAL PLAN 2021-2040

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1. Introduction

- 1.1 There is a well-established Traveller¹ community in East Hampshire district. The community lives in a variety of accommodation; including bricks and mortar homes, mobile homes, and touring caravans. A Traveller 'site' can consist of one household living on one pitch or plot², or many pitches or plots on one site. Multiple pitch/plot sites are often accommodated by one extended family but can be non-related households. All the Traveller accommodation in East Hampshire district is privately owned – none is owned and managed by the Local Authority or the County Council.
- 1.2 The Council recognises the value of closer working relations with the local Traveller community. Often a socially excluded group, the community has a significantly lower life expectancy and lower educational attainment than the settled community. The Council recognises the contribution that decent permanent culturally suitable accommodation can have to the overall wellbeing of Traveller families.
- 1.3 National Planning Policy Framework (NPPF) reflects this, stating that it is important that the needs of groups with specific housing requirements are addressed. In recognition of the complexities of planning for Traveller accommodation, there is separate national planning policy called 'Planning Policy for Traveller Sites' (PPTS), 2015. It is the policy guidance in this document, along with relevant legislation³ that the Council must follow with regards to its consideration of the accommodation needs of the Traveller community in the Local Plan.
- 1.4 Akin to general housing, PPTS requires local authorities to assess the accommodation needs for Travellers, and to develop a strategy to meet that need, including setting targets for pitches and plots. Local authorities are also required to demonstrate a five-year supply of deliverable pitches and plots, and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- 1.5 This background paper provides information on how the Council is working towards achieving this for the planning authority area (that part of the district outside the South Downs National Park), structured by the key steps taken so far (see Section 2).
- 1.6 The South Downs National Park Authority Local Plan 2019 includes Strategic Policy SD33: Gypsies, Travellers and Travelling Showpeople, which seeks to meet identified accommodation needs. The South Downs National Park Authority is now reviewing its Local Plan 2019 and will revisit these accommodation needs and provision. In March 2021, the council signed a [Statement of Common Ground](#) with the South Downs National Park Authority in relation to housing and traveller accommodation need.

¹ For the purposes of this paper, the term 'Traveller' will include Gypsy, Traveller and Travelling Showpeople. Where the reference is specific to a group, such as Travelling Showpeople, it will be stated.

² Gypsy and Traveller accommodation is generally termed as a pitch, whereas the equivalent for a Travelling Showpeople site is a plot or a yard. This paper uses the term plot. A plot tends to be much larger than a pitch, due to the storage of equipment.

³ In particular, The Housing and Planning Act (2016) and The Equality Act 2010.

2. Steps taken so far

- 2.1 This is an overview of key steps taken towards meeting the policy requirements for Traveller accommodation in the emerging Local Plan. More detail is provided further on regarding each heading.
- 2.2 Initial first steps:
- Evidence gathering
 - Call for sites (2018, continuous)
 - Early and effective engagement
- 2.3 Subsequent steps:
- Site assessment (Land Availability Assessment, annually)
 - Proposed site allocations in the draft Local Plan (reg. 18, 2019)
 - Strategic policies in the draft Local Plan (reg.18, 2019)
 - Proposed provision on large development sites (reg. 18, 2019)
 - Update the Gypsy and Traveller Accommodation Assessment (GTAA, 2017 and 2020)
 - Statement of Common Ground with the South Downs National Park Authority (2021)
- 2.4 Throughout:
- Duty to Co-operate Engagement
 - Determine planning applications for Traveller accommodation and update five year supply position statement
- 2.5 Next steps:
- Further call for sites for Traveller accommodation
 - Further Local Plan (Reg.18) consultations (2022 and 2023)
 - Specific engagement with Duty to Co-operate partners following close of call for sites and Local Plan consultation (2022).
- 2.6 The structure of this paper follows this general order of steps.

3. Evidence Gathering

- 3.1 PPTS says, “local planning authorities should use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions.” (paragraph 7c).
- 3.2 Opinion Research Services (ORS) were first appointed in 2017 to undertake a comprehensive Gypsy and Traveller Accommodation needs Assessment (GTAA) in the East Hampshire district. Since then, a further assessment has been carried out, and published in 2020. The [Gypsy, traveller and travelling showpeople accommodation assessment 2020](#) is the current up to date evidence of need in East Hampshire.
- 3.3 The assessment covers the whole area of the district as a housing authority, however, within that area, the study provides results for the South Downs National Park planning authority area, and East Hampshire district planning authority area.

The results for East Hampshire district exclude the South Downs National Park planning authority area.

3.4 The findings of the GTAA 2020 assessment are:

Table 1 The need for Gypsy and Traveller pitches in East Hampshire (meeting the planning definition) accounting for unknown households

Years	2020-25	2025-30	2030-35	2035-36	Total
No. of pitches	49	7	7	3	66

Table 2 The need for Travelling Showpeople plots in East Hampshire (meeting the planning definition) accounting for unknowns

Years	2020-25	2025-30	2030-35	2035-36	Total
No. of plots	36	4	5	2	47

3.5 This is a significant need, much higher than that identified in the GTAA 2017.

3.6 PPTS says that local planning authorities should also have an up to date understanding of the likely transit accommodation needs of the area over the plan period. Whilst most Travellers have a permanent base, some travel for all or part of the year. To avoid unauthorised encampments in unsuitable locations, transit accommodation can be provided. Clearly, this needs to be in suitable locations on frequently travelled routes and be well managed.

3.7 The GTAA 2020 states, "it is not recommended that there is a need for a formal public transit site in East Hampshire at this time", instead the assessment recommends review and monitoring, working with relevant partners.

3.8 The GTAA 2020 assesses need up to 2036. Given the Local Plan period is now 2021 to 2040, a review of the GTAA will be carried out in 2023, to update the findings, and take account of new sites.

4. Call for Sites

4.1 To understand what land is potentially available for development in the new Local Plan in the district (outside the SDNP) the Council undertook a call for sites. The call for sites was open for 12 weeks and closed on Friday 4 May 2018. The site suggestion form required stating what uses the land would be available for, should it be suitable. This included Traveller accommodation.

4.2 All those on the Council's Local Plan mailing list were contacted, in addition to those who had previously suggested sites. The call for sites was advertised on the Council's website.

- 4.3 In total, 24 sites were identified that promoted the land for Traveller accommodation (singularly or as one of many possible land uses). The total number of sites were sourced from:
- Site suggestions (call for sites)
 - The GTAA 2017 (list of sites surveyed)
 - Planning history
 - Council owned land
 - Liaison with the Traveller community
- 4.4 Since then, the ability to submit site suggestions for consideration in the Local Plan has remained open, as part of the preparation of the Land Availability Assessment, which is updated annually. A form remains available for submission on the Council's [website](#).
- 4.5 During this time we have liaised many times with contacts within the Traveller community, to seek site suggestions. Officers have offered assistance with completing forms and submitting information and visited sites to explain Local Plan process.
- 4.6 During the Local Plan consultations in 2019, all members of the Traveller community known to the council were contacted with details of the consultation, including relevant planning agents and Traveller organisations, and invited to respond, submit site suggestions, and/or meet with officers to discuss.
- 4.7 In 2019 and 2020, the Council corresponded with Hampshire County Council regarding its landholdings, and any potential surplus land that could be considered for Traveller accommodation. The County Council carried out a detailed review of its land, but did not find any potential sites to be considered. The feedback received was as follows;
- “We have completed an internal review of County Council owned assets within the East Hants District administrative boundary in relation to their potential suitability for Gypsy, Traveller and / or Travelling Show People accommodation. As I have advised previously, this review has taken place within the context of a wider-ongoing corporate review of the County Council’s land for its operational requirements that is subject Member approval. With this in mind, our internal review has re-affirmed the County Council’s landowner position in 2019 which is that there is unfortunately no available or suitable land in the East Hants District that could have future development potential for Gypsy or Traveller related accommodation. In summary, the County Council’s land holdings were either in operational use, identified as allocations for development in the East Hants Local Plan or were unsuitable due to their physical constraints including limited size, flood risk, topography, trees or ecological designation.”*
- 4.8 Since 2019, some additional sites have been identified. Equally some sites originally identified have either been developed or are not available. A further call for sites is being done as part of the Local Plan consultation 2022.

5. Early and Effective Engagement

- 5.1 PPTS says that “local planning authorities should: a) pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups)”. In line with the Council’s Statement of Community (2021), organisations representing the interests of ethnic, religious or disabled groups for example, are specifically consulted.
- 5.2 The Council has a cross service internal Traveller accommodation working group to draw together knowledge and expertise. Lead by the planning policy team, the key aims of the group are to:
- Help effectively and positively involve the Traveller community in the Local Plan process, particularly in relation to site allocations for Traveller accommodation;
 - Help produce an effective and deliverable Local Plan that meets the development needs of all members of the community;
 - Help ensure the Council meets its legal duties and planning requirements.
- 5.3 With the assistance of the Communities team, contact has been made over the last few years with several members of the Traveller community and visits carried out. Letters have also been sent to established sites where a desk top exercise has considered there may be potential for intensification or expansion of pitches/plots. These will be followed up during the Local Plan consultation (2022), and all known sites will be mailed during all Local Plan consultation stages and offered a meeting with an officer.
- 5.4 The Council recognises that to assess and allocate land that will be delivered, a greater understanding of individual household’s circumstances is needed. The Council’s planning and communities team members are keen to meet with any Traveller household residing in the district at present or representative to discuss the Local Plan process and how they can be involved.

6. Land Availability Assessment (LAA) - Site Assessment

- 6.1 Having identified possible sites, the LAA is the process by which the land is assessed for its suitability, availability, viability and overall deliverability. The LAA (2022) considers land for a variety of uses, and identifies all potentially developable land, from which site allocations can be selected. The selection of proposed site allocations is informed by other evidence base, including the Sustainability Appraisal.
- 6.2 The LAA 2022 documents the methodology used, including a section on how this has been tailored to be appropriate for consideration of land for Traveller accommodation.
- 6.3 The LAA concludes that at present, there is insufficient developable land to meet the need for Traveller accommodation in the area. There is one particular constraint to development that is a significant contributing factor to this outcome. That is the proximity of available land to the Special Protection Area (SPA).

- 6.4 There are well-established Traveller communities living close to each other in Liphook (Queens Road / Longmoor Road – where the two roads meet), and Headley Down (north east of Grayshott Road). As there is an established community residing here, there are consequently identified accommodation needs (for example, from new household formation). Equally, in many cases, there is available land to accommodate additional pitches either within existing sites or through extension. However, much of that land is within 400m of the SPA, or within the SPA itself, rendering it unsuitable and thus undevelopable.
- 6.5 Some remaining capacity was identified for residential development within 400m of the SPA, and this was earmarked for Traveller accommodation and affordable housing, as set out in the Joint Wealden Heaths Phase II Special Protection Area - Supplementary Planning Document (SPD) . However, that capacity has been exhausted by planning permissions, and thus cannot serve any Local Plan allocations.
- 6.6 This presents challenges, as much of the identified need cannot be met where it is being sourced from. Traditionally, and often, Traveller families live as extended households, and moving to other sites away from an established community is not preferable. Likely, such a constraint will cause compliance challenges, and cause households to live in unsuitable overcrowded accommodation. The Council is aware of this and has discussed the position with Natural England.
- 6.7 Also of note, flood risk is a significant constraint to development of Traveller accommodation⁴. Traveller accommodation should only be allocated in Flood Zone 1 (low risk), and only where it is not possible to meet needs within Flood Zone 1, should areas within Flood Zone 2 be considered (subject to passing the Exception Test). Traveller accommodation should not be permitted in Flood Zone 3 (high risk).
- 6.8 The LAA 2022 has identified ‘developable’ land that can accommodate:
- 16 Traveller pitches
 - 6 Travelling Showpeople plots
- 6.9 Despite efforts, insufficient land has been identified to meet the identified need.
- 6.10 NPPG says,

“When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.

⁴ NPPG identifies caravans, mobile homes and park homes intended for permanent residential use as a highly vulnerable use, which can only be located in Flood Zone 1 (low risk), or in Flood Zone 2 if the Exception Test is passed.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.” Paragraph: 025 Reference ID: 3-025-20190722.

- 6.11 Reviewing the assessment and changing assumptions will not assist this at present as such is the scale of insufficient land identified. The Council is carrying out a further call for sites as part of the Local Plan consultation 2022.
- 6.12 If following further engagement and assessment, insufficient developable land is identified, the Local Planning Authority will as part of the ongoing discussions with adjoining areas through the Duty to Co-operate, consider if and how needs can be met at a wider scale.
- 6.13 The LAA has not identified developable land for transit accommodation.

7. Proposed Allocations

- 7.1 The Draft Local Plan 2019 included proposed Site Allocations for Traveller accommodation. Some of these have since received planning permission, or unsuccessfully applied for planning permission. Using the evidence available in the LAA 2022, and any further site suggestions from the Call for Sites 2022, proposed site allocations for Traveller accommodation will be included in the next iteration of the Local Plan, scheduled for consultation in 2023.

8. Sites

- 8.1 Sites identified in the LAA 2022 to be considered for allocation in the emerging Local Plan 2021-2040

LAA site ref	Address	Parish	Type of accommodation	Potential Number of pitches/plots
LAA/BEN-014	The Paddocks, Station Road, Bentley	Bentley	Traveller	6
LAA/FM-022	Fordlands, Brislands Lane, Four Marks	Four Marks	Traveller	2
LAA/LIP-032	Hilltop Stables, Devils Lane, Liphook	Bramshott & Liphook	Traveller	3
LAA/FM-035	Dovecot, Hawthorn Lane, Four Marks	Four Marks	Traveller	5

LAA/HEA-011	Land at Middle Common, Headley Down	Headley	Travelling Showpeople	6
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8.2 Sites considered not suitable in the LAA 2022

LAA site ref	Address	Parish	Type of accommodation
LAA/CHA-003	Land north of Wolf's Lane	Chawton	Travelling Showpeople
LAA/FM-036	Land to the rear of Briars Lodge	Four Marks	Traveller
LAA/BTW-006	Land north of Lower Park Farm, Abbey Road	Bentworth	Traveller

8.3 Sites requiring further assessment

LAA site ref	Address	Parish	Type of accommodation
LAA/KIN-001	The Willows, Forge Road, Kingsley	Kingsley	Traveller
LAA/ROP-021	Land west of Highgate House, Lyeway Lane, Ropley	Ropley	Traveller
LAA/HD-026	Trickett, Fairfield, Roads Hill	Horndean	Travelling Showpeople

8.4 The availability of these sites is not known.

8.5 Sites can be viewed in the LAA at www.easthants.gov.uk/land-availability-assessment.

9. Strategic Policies in the Local Plan

9.1 Whilst discussions continue with adjoining planning authorities on strategic matters, including provision of Traveller accommodation, it is widely known that many local planning authorities struggle to identify land to meet this need.

9.2 In recognition of this, the draft Local Plan will likely propose a combination approach to meeting the need over the plan period. This acknowledges that new Traveller accommodation contributing towards meeting need is equally likely to be provided through the planning application process.

9.3 To help meet needs, the first thing that can be done is to safeguard existing Traveller accommodation. As such, the draft Local Plan will likely propose to safeguard existing Traveller accommodation with permanent planning permission to ensure it is not lost to other uses. It is futile providing new accommodation if existing accommodation can be changed to other uses. Following that baseline position, the likely approach to meeting identified needs is:

9.4 Policy based:

- Allocate deliverable land for Traveller accommodation

- Include a criteria-based policy in the draft Local Plan (Regulation 18) that assesses planning applications for Traveller accommodation (including transit accommodation)
- Encourage Neighbourhood Plans to include the local Traveller community in the plan making process, and recognise their accommodation needs through allocations where appropriate.

9.5 Engagement:

- Continue to engage with the Traveller community to help find additional available land during the Local Plan process, and encourage appropriate planning applications thereafter
- Continue to work with neighbouring local planning authorities and specific consultation bodies under the Duty to Co-operate (including with regards to evidence gathering and transit accommodation requirements).

9.6 In addition, the Council has taken a keen interest in the preparation of Local Plans in other authorities, where failure to fully attempt to address needs could add pressure to accommodation needs in our district. In 2020, the Council responded to Slough Borough Council Local Plan consultation, as unmet needs from that area became known of from a planning application in East Hampshire. Our response concluded as follows;

We therefore urge Slough Borough Council to reassess its position by preparing a robust GTAA, and if a need is identified for accommodation, to plan to meet that need in its emerging Local Plan. We also suggest working with neighbours and partners through the Duty to Co-operate on this issue, particularly mechanisms to address unauthorised encampments. A Council's failure to do this puts unacceptable additional pressures on other areas, contravenes national planning policy and is likely a breach of the Council's duty under the Equalities Act.

9.7 To add to the complexity of the issue, there is a definition of Travellers for 'planning purposes', as set out in PPTS. Those Travellers who fall outside of the definition of Travellers for 'planning purposes' may still have a need for culturally suitable accommodation. The GTAA 2020 considered this and did not identify a need for this type of accommodation, therefore a policy based approach will likely be taken should such planning applications be submitted.

10. Next steps

10.1 During the Local Plan consultation (2022), further targeted engagement will take place with the Traveller community, to try and identify more land and encourage engagement with the Local Plan process. All known Traveller sites in the area will be mailed during all Local Plan consultation stages and offered a meeting with an officer.

10.2 In addition, evidence will continue to be collected about unauthorised encampments, to assist with the recommendation of the GTAA 2020 to monitor and review.

10.3 The Council will continue dialogue with its partners and ask Hampshire County Council to review its consideration of its land holdings, that was done in 2020.

10.4 The Traveller Working Group will meet to share information and continue a Council wide approach to improving liaison and engagement with the local Traveller community.

10.5 This background paper will be updated to accompany the next Local Plan consultation.

11. Wider Context

11.1 There is a national shortage of Traveller accommodation, and many local planning authorities struggle to identify sufficient land to meet needs. Many Travellers move around districts/boroughs within a regional area to find permanent accommodation.

11.2 The Council believes the best approach is to allocate as much deliverable land to meet needs in the Local Plan as possible, to enable the approach to primarily be plan led giving the opportunity to have specific detailed policies for sites. This is preferable to leaving the location of all new sites to be determined by planning applications.

11.3 The Council has a duty to consider the accommodation needs of all members of the Traveller community, regardless of their status in terms of the planning definition.