

**GYPSY, TRAVELLER AND TRAVELLING SHOWPEOPLE SITE SEARCH STUDY
FINAL REPORT**

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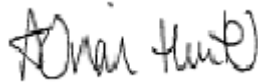
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1.0 INTRODUCTION AND BACKGROUND

Introduction

- 1.1 Tewkesbury Borough Council (the Council) has appointed DLP Planning (DLP) to provide advice on the delivery of pitches and plots, which will help to identify sites required to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople identified in the Gloucestershire wide Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA 2013) undertaken by Opinion Research Service (ORS). The objective of this study is to use previous broad location work completed as part of the GTAA and assess potential sites to determine if they are suitable, available and achievable.
- 1.2 The results of this study will inform the development of relevant policies and allocations in the emerging Tewkesbury Borough Plan and guide the consideration of future planning applications for Gypsy, Traveller and Travelling Showpeople sites.

Background

- 1.3 Gypsies and Travellers have lived in Britain for at least 500 years and probably longer. For the purposes of the planning system, Gypsies and Travellers means:
- 1.4 *“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.”* (Planning Policy for Traveller Sites, CLG, March 2012).
- 1.5 Many Gypsies and Travellers continue to pursue an active itinerant lifestyle and are generally self-employed people. However, increasingly communities are becoming more settled.
- 1.6 Gypsies and Travellers are not a uniform homogeneous community, but rather a group of communities which share some features but have their own histories and traditions. Even within each main group there is fragmentation between different families which emphasises the lack of a cohesive community and the need to avoid over generalisations. However, the main cultural groups include:
- Romany Gypsies;
 - Irish Travellers; and
 - New Travellers.

- 1.7 Romany Gypsies and Irish Travellers are recognised in law as distinct ethnic groups and are legally protected from discrimination under equalities legislation.
- 1.8 Travelling Showpeople have traditionally been involved in holding fairs and circuses for many hundreds of years. For the purposes of the planning system, Travelling Showpeople means:
- 1.9 *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their family’s or dependent’s more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.”* (Planning Policy for Traveller Sites, CLG, March 2012).
- 1.10 The Government published a new policy statement ‘Planning Policy for Traveller Sites’ in 2012, replacing Circulars 01/2006 and 04/2007 to address future accommodation needs of Gypsies, Travellers and Travelling Showpeople because the previous planning policy arrangements had failed to deliver adequate sites to meet identified needs over the previous 10 years.
- 1.11 Local planning authorities are currently required to identify and allocate sufficient sites to meet the needs of these groups within their local plans (The emerging Local Plan for Tewkesbury is made up of the Joint Core Strategy (JCS), prepared and progressed in partnership with Gloucester City and Cheltenham Borough Councils and the Tewkesbury Borough Plan). The guidance means that when delivering sites, consideration is required as to which sites are available and suitable for different categories within the travelling community.

2.0 Existing Sites and Needs

Introduction

- 2.1 'Planning Policy for Traveller Sites' (CLG, March 2012) states that the overarching aim of Government is "to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community." (para 3).
- 2.2 The document includes some significant changes to the way in which the site needs of Gypsies, Travellers and Travelling Showpeople are planned for. The most significant change has been the removal of regional targets and the replacement with a new system of locally generated targets. Under this, local planning authorities are required to:
- 2.3 Use a robust evidence base to establish accommodation needs;
- Set pitch and plot targets to address the likely permanent and transit site accommodation needs of Travellers in their area;
 - Identify and update annually a supply of specific deliverable sites to provide five years' worth of sites against their locally set targets;
 - Identify a supply of specific developable sites or broad locations for years six to ten and where possible for years 11-15; and
 - Set criteria based policies to meet identified need and/or provide a basis for decisions in case applications nevertheless come forward.
- 2.4 The local authorities of Gloucestershire jointly commissioned consultants, ORS, to carry out an Accommodation Needs Assessment of Gypsies, Travellers and Travelling Showpeople for the whole County; the objective of that assessment being to quantify the number of Gypsy and Traveller pitches and Travelling Showpeople plots to meet identified needs between 2013 and 2031. The Study provides evidence to address the first two requirements set out above for each local authority.
- 2.5 The Gypsies and Travellers and Travelling Showpeople Site Search Study seeks to identify and assess potential sites to meet the needs identified in the Accommodation Needs Assessment for Tewkesbury Borough. DLP Planning's objective is to provide evidence to support the Council to identify and allocate sites and establish a criteria based policy in the emerging Tewkesbury Borough Plan.

Existing Sites

Gypsies and Travellers

- 2.6 In Tewkesbury Borough there is a need for residential Gypsy and Traveller sites. Residential sites provide residents with a permanent base from which to travel and can be privately owned, publicly rented (for affordable pitches), or privately rented from other Gypsies and Travellers. The size and the amount of facilities available on these sites varies between sites.
- 2.7 Sites are made up of a number of caravan pitches and associated facilities. Although there is no national definition of what size a pitch should be, a general guide contained in *Designing Gypsy and Traveller Sites*¹ states that “an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan... drying space for clothes, a lockable shed... parking space for two vehicles and a small garden” (para 7.12). On average, usage is approximately 1.7 caravans per pitch.
- 2.8 Residential sites provide a permanent home and the amount of facilities on site varies mainly between public and private sites. Public sites will generally have amenity blocks and sometimes play areas and communal spaces. Private site facilities vary enormously depending on the requirements of the residents.
- 2.9 It should be noted that the information presented on existing sites reflects the GTAA base date of 2013. Any changes in planning status since that date will be reflected as part of the study and enable any planning changes to be taken into consideration when needs are compared to potential supply later in the study. Within Tewkesbury Borough there are currently 22 private and occupied Gypsy and Traveller sites, ranging in size from single pitch family sites to one site containing over 20 pitches. There are also 3 publicly owned sites in Tewkesbury Borough.

Table 1 Existing Gypsy and Traveller Sites in Tewkesbury

Ref	Site Name	Settlement	Planning Status	Green Belt location
TB001	Cursey Lane	Elmstone Hardwicke	Public authorised site	Not within Green Belt
TB002	Showborough	Twynning	Public authorised site	Not within Green Belt
TB003	Willows	Sandhurst Lane	Public authorised site	Not within Green Belt

¹ Communities and Local Government (2008) *Designing Gypsy and Traveller Sites Good Practice Guide*

TB004a	Vienna	Over	Private authorised site	Not within Green Belt
TB004b	Westward	Over	Private authorised site	Not within Green Belt
TB005	Field View	The Leigh	Private authorised site	Not within Green Belt
TB006	Cherry Orchard	Minsterworth	Private authorised site	Not within Green Belt
TB007	The Lodge	Minsterworth	Private temporary site (subject to current appeal)	Not within Green Belt
TB008	Mushroom Farm	Minsterworth	Private authorised site	Not within Green Belt
TB009	Hygrove Place	Minsterworth	Private authorised site	Not within Green Belt
TB010	Land adjacent Willows	Sandhurst Lane	Private authorised site	Not within Green Belt
TB011	Beggars Roost	Bamfurlong Lane	Tolerated site	Within the Green Belt
TB012	Hillview View	Staveton	Private authorised site	Within the Green Belt
TB013	Kimberley House	Shuthonger	Private authorised site	Not within Green Belt
TB014	Rosebank	Shuthonger	Private authorised site	Not within Green Belt
TB017	Brookside Stables	Badgeworth	Private temporary site	Within the Green Belt
TB018	Taylor's Yard	Over	Private authorised site	Not within Green Belt
TB019	New Bungalow	Over	Private authorised site	Not within Green Belt
TB020	Treetops	Shuthonger	Tolerated site	Not within Green Belt
TB021	The Barn	Uckington	Private unauthorised site	Within the Green Belt
TB040	Land at Starcroft Lane	Minsterworth	Private temporary site	Not within the Green Belt
TB048	Land at Ripple	Ripple	Private unauthorised site	Not within Green Belt
TB052	Coach House	Minsterworth	Private authorised site	Not within Green Belt

- 2.10 At study/GTAA base date (April 2013) seventeen sites had full permanent planning permission or are historically tolerated, three sites had temporary permission and two of the sites were unauthorised.

Travelling Showpeople

- 2.11 The needs of Travelling Showpeople are different to Gypsies and Travellers. Their sites often combine residential, storage and maintenance uses. Typically a site contains areas for accommodation, usually caravans and mobile homes, and areas for storing, repairing and maintaining vehicles and fairground equipment. These combined residential and storage sites are known as plots.
- 2.12 Although Travelling Showpeople travel for extended periods, they require a permanent base for storage of equipment and for residential use during the winter. These plots (or yards) are also occupied throughout the year, often by older people and families with children, for example. The Showmens Guild 'Model Standard Package' provides model standards and site considerations when developing and planning for Travelling Showpeople sites.
- 2.13 In Tewkesbury Borough there is currently 2 privately owned and occupied Travelling Showpeople's sites. At the GTAA base date, TB023 had a personal permission but has recently been granted full permission. TB024 had a temporary permission at the GTAA base date but now has full permission. The sites represent permanent bases for the family's which are occupied when they are not travelling for work and will contribute towards the overall plot needs. **Table 2** sets out the existing sites:

Table 2 Existing Travelling Showpeople Site in Tewkesbury

Ref	Site Name	Settlement	Planning Status	Green Belt location
TB023	Locks Paddock	Norton	Private authorised site	Not within Green Belt
TB024	Showlands, Evesham Road	Gotherington	Private temporary site (now permanent)	Not within the Green Belt

Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2013

- 2.14 A new Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) was completed by consultants Opinion Research Services (ORS) for the whole of Gloucestershire in August 2013.

- 2.15 As part of that study, interviews were attempted with every Gypsy and Traveller household in the area who were present during the fieldwork period in November and December 2011. In total, interviews were achieved with 149 households on existing sites and yards and 24 households in bricks and mortar.
- 2.16 The GTAA estimates that the extra site provision to meet residential needs between 2013 and 2031, for Tewkesbury Borough, is 147 pitches for Gypsies and Travellers. The GTAA outlines the methodology of how this number was derived.
- 2.17 This includes the need of existing households on unauthorised sites, households on the waiting list for a public site and new households likely to form by 2031 due to household formation. The majority of the Gypsy and Traveller pitches will be required for private sites.
- 2.18 Interviews were attempted with every Showpeople household in the area. Interviews were achieved with 39 Travelling Showpeople.
- 2.19 The estimated extra site provision to meet residential needs for the Travelling Showpeople households in Tewkesbury Borough between 2013 and 2031 is 22 plots to address the needs of all identifiable households. **Table 3** below sets out the GTAA need for Tewkesbury in 5 year time periods:

Table 3 GTAA need for Tewkesbury in 5 year time periods

Provision	2013-2017	2018-2022	2023-2027	2028-2031	Total
Gypsy and Traveller Residential Pitches	64	27	29	27	147
Travelling Showpeople Plots	17	1	2	2	22

- 2.20 Overall pitches required for Gypsies and Travellers has been estimated at 147 pitches by 2031. This includes 64 pitches within the first 5 years (2013-2017). The GTAA also identifies a need for 22 Travelling Showpeople Plots by 2031, with a need for 17 plots in the first 5 years.
- 2.21 Tewkesbury Borough Council will also need to attempt to reflect the breakdown in Gypsy and Traveller Pitches between the specific needs for public provision and private provision. In essence public provision is an indication of the level of affordable pitch provision needed by the travelling community. **Table 4** overleaf sets out this breakdown.

Table 4 Public/Private Breakdown of Pitch Provision

Gypsy and Traveller Public/Private needs	2013-2017	2018-2022	2023-2027	2028-2031	Total
Public Pitches	20	12	13	12	57
Private Pitches	44	15	16	15	90
Total	64	27	29	27	147

- 2.22 **Table 4** identifies that 57 public pitches are required by 2031, with 20 within the first 5 years (2013-2017). In addition 90 private pitches are required by 2031, with 44 within the first 5 years.
- 2.23 The GTAA does not identify a specific need for either a public transit site or temporary stopping place within Tewkesbury Borough for either Gypsies and Travellers or Travelling Showpeople, but does identify that if the Gloucestershire authorities collectively wish to provide a new transit site it would strengthen their position when dealing with unauthorised transit activity.

Number of Sites Required

- 2.24 National evidence would suggest that Gypsies and Travellers prefer small sites containing a small number of pitches to accommodate their immediate family and extended family. Government guidance suggests that “experience of site managers and residents alike suggest that a maximum of 15 pitches is conducive to providing a comfortable environment which is easy to manage. However, smaller sites of between 3-4 pitches can also be successful, particularly where designed for one extended family” (para 4.7 of Designing Gypsy and Traveller Sites Good Practice Guide).
- 2.25 It is therefore difficult to identify the exact number of sites required to meet the pitch requirements for Tewkesbury. The actual number of sites required will be determined according to a number of factors including taking account of:
- The different cultural, ethnic and family groupings of Gypsies and Travellers;
 - The extent to which additional provision could be made through extension or intensification of existing sites; and
 - Whether replacement sites need to be found for existing sites which may be unsuitable or unsustainable.
- 2.26 For Travelling Showpeople, the future need arises from the occupants of a temporary site and future household growth from existing yards. This is likely to require formalisation and/or extension (if possible) of existing sites or additional sites.

3.0 Methodology

Introduction

- 3.1 This section sets out the methodology DLP Planning have followed to complete the Tewkesbury Borough Council Gypsy, Traveller and Travelling Showpeople Site Search Study to identify sites to meet Gypsy, Traveller and Travelling Showpeople needs and establish site criteria for planning policy. DLP Planning have developed a methodology that is driven by national guidance and are confident it will provide what is needed in an efficient fashion. The methodology was available for the public's consideration and comments received were considered and amendments made before the methodology was finalised and applied to potential sites.

Review of Sources of Sites

- 3.2 DLP Planning and Tewkesbury Borough Council have gathered sites together for the Part 1 Assessment. This involved the consideration of a number of sources of sites and initial sieving to remove sites with no availability early in the process. The review of site sources considered the following:

- Authorised Sites - All existing Gypsy, Traveller and Travelling Showpeople sites with full, temporary or personal consents or certificates of lawful use were taken forward to the **Part 1** assessment to be assessed for potential intensification and/or expansion;
- Unauthorised Sites and those with a previous planning history - All existing unauthorised and tolerated sites and previous planning application sites were taken forward to the **Part 1** assessment;
- Call for Sites - All sites submitted for Gypsy, Traveller and/or Travelling Showpeople uses during previous Local Plan Call for Sites or the specific Call for Sites for this study were taken forward to the **Part 1** assessment. DLP Planning provided a response form and letter to help landowners submit sites.
- Tewkesbury Borough Council and Gloucestershire County Council Owned Land – DLP Planning reviewed GIS layers of both authorities land ownership and undertook an initial sieve removing all obviously unavailable or incidental public land such as; public buildings, public open space, active waste facilities and highway verges. DLP Planning included sites agreed by Tewkesbury Borough Council within the **Part 1** Assessment;
- Surplus Public Sector Land – In conjunction with the call for sites exercise other public bodies identified by the Council, e.g. Homes and Communities Agency, were

included in the call for sites to identify sites. DLP Planning included sites agreed by the Council and the relevant public sector body within the **Part 1** Assessment;

- Sites submitted for Land Availability Assessment – The Council contacted all owners of sites submitted for housing or employment to establish if those sites are available for Gypsy, Traveller and Travelling Showpeople use. All sites which were identified as available by the owners for Gypsy and Traveller use through this process were taken forward to the **Part 1** assessment.

- 3.3 The output of the review was a list of sites from each source, compiled by DLP Planning and Tewkesbury Borough Council in collaboration, which was taken forward into the **Part 1** Assessment.

Identifying Criteria for Site Assessment

- 3.4 Based upon a review of all available policy, guidance, identified site need from the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) and physical constraints, DLP Planning identified a list of site criteria for agreement with Tewkesbury Borough Council following a period of consultation. The draft methodology was made available between 5th and 31st December.

- 3.5 Following consultation the methodology was finalised by DLP Planning and used to assess potential sites. The criteria could also be used to inform future Council policy and could subsequently be used to determine planning applications.

- 3.6 Account was taken of national policy, as contained within Planning Policy for Traveller Sites (CLG, 2012), existing and emerging local policy, as contained within saved policies from the adopted Local Plan (2006) and emerging policy from the Joint Core Strategy and Tewkesbury Borough Plan. Account was also taken of the existing pattern and distribution of need for Gypsy, Traveller and Travelling Showpeople provision as set out in the GTAA.

- 3.7 Having regard to the overall policy framework, the approach to identifying appropriate site selection criteria has been to build upon the National Planning Policy Framework:

- Is the site available?
- Is the site suitable? and
- Is the site developable? e.g. viable and deliverable?

- 3.8 A key consideration, based upon national policy, was that criteria should be “fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community” (Planning Policy for Traveller Sites, 2012, paragraph 10). Criteria should be clear, transparent and unambiguous. Many previous

studies and local plan criteria based policies across the country have used very restrictive criteria which have prevented many reasonable sites from coming forward.

- 3.9 DLP Planning have taken account of various criteria including the following sources:
- National Planning Policy Framework, 2012 and National Planning Policy Guidance, 2014;
 - ‘Planning Policy for Traveller Sites’, 2012;
 - Saved and emerging local policies within the Joint Core Strategy (submission version, November 2014) and emerging Tewkesbury Borough Plan;
 - The Showmen’s Guild of Great Britain ‘Model Standard Package’; and
 - ‘Designing Gypsy and Traveller Sites’, 2008.
- 3.10 The site criteria proposed was applied in two parts, the ‘**Part 1** Assessment’ was desk based and involved the consideration and application of broad suitability criteria, including absolute constraints and an initial investigation of likely availability.
- 3.11 The objective of the **Part 1** Assessment was to sieve out sites which were very likely to be rejected on suitability grounds due to major constraints such as; being within international environmental designations, within the boundaries of scheduled ancient monuments or within flood zone 3a/b.
- 3.12 Availability is a key criteria and discussions, regarding the future availability of the sites to accommodate additional pitches/plots, informed the **Part 1** Assessment. The output from Part 1 was an ‘Assessment Matrix’ of sites using a traffic light approach to identifying where sites do not satisfy the criteria in red, where the criteria may be capable of being satisfied but require further investigation in yellow and where the criteria are satisfied in green. **Table 5** overleaf sets out the **Part 1** Assessment criteria.

Table 5 Part 1 Assessment (Desk Based) Criteria				
Criteria	Designation/Issue	Red (Site does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Flood Risk	Environment Agency Indicative Flood Mapping and SFRA. Area at Risk of Flooding.	The site is within flood zone 3a and/or 3b and is not suitable for Gypsy, Traveller or Travelling Showpeople use.	The site is within flood zones 2 requiring further investigation (and application of policy tests).	The site is not affected by identified areas of indicative flooding or is located in flood zone 1.
Environmental Designations	Special Protection Area. Special Area of Conservation. RAMSAR Site. Site of Special Scientific Interest. National Nature Reserve. Site of Nature Conservation Importance.	The site is within an international or national environmental designation.	The site is within the buffer or close proximity of an international or national designation and could therefore have a negative impact. The site is covered by a local designation or is within close proximity and could therefore have a negative impact.	The site is not within an international, national or local environmental designation or within its buffer.
Green Belt and Landscape	Green Belt. Area of Outstanding Nature Beauty.	n/a	The site is within (or close to) the Green Belt or sensitive landscape and could therefore have a negative impact requiring further investigation.	The site is not located in the Green Belt or sensitive landscape.
Potentially Contamination or Unstable Land Issues	Potentially Land contamination or unstable land issues.	The site is located within or adjacent to, a landfill site or the land is unstable and has been identified as unsuitable for residential use.	The site is potentially contaminated or unstable and requires further investigation.	There are no known contamination or unstable land issues.

Table 5 Part 1 Assessment (Desk Based) Criteria				
Criteria	Designation/Issue	Red (Site does not satisfy criteria)	Yellow (Criteria may be capable of being satisfied)	Green (Criteria are satisfied)
Noise Issues	Noise issues relating to existing land uses or transport corridors.	n/a	The site is located adjacent to noisy land uses, which requires further investigation.	There are no noisy adjacent land uses and therefore no noise impact on the site.
Residential Amenity	Location of site in relation to existing dwellings.	n/a	The site is adjacent to existing dwellings and requires further investigation.	There are no adjacent dwellings and therefore no impact on residential amenity.
Historic Assets	Scheduled Monuments. Registered Parks and Gardens. Battlefields. Conservation Areas. Listed Buildings. Non designated heritage assets.	The site is within a Scheduled Monument or Registered Park and Garden.	The site is within a Battlefield or Conservations Area or adjacent to a historic asset.	The site is not within or adjacent to any historic asset.
Availability and Capacity	Submitted sites, public land ownership, etc.	The owner has confirmed that the site is not available, nor is it likely to be available in the future and/or the capacity of the site is already above the recommended size (15 pitches) set out in Government guidance.	Site availability is unknown and requires further investigation. Potential for Land Registry searches (if required). Public owned sites deemed potentially available for Gypsy, Traveller and/or Travelling Showpeople use unless informed otherwise.	There is evidence that the landowner is willing to sell or develop the site for Gypsy, Traveller and/or Travelling Showpeople use.

4.0 Site Assessment and Capacity

4.1 All sites identified for assessment at **Part 1**, were as outlined from the source of sites within **para 3.2**. This resulted in a total of 104 sites being assessed at **Part 1**.

4.2 This included all existing authorised and unauthorised Gypsy and Traveller sites (25 sites) and Travelling Showpeople site (2 sites). It did not include any sites owned by Tewkesbury Borough Council or Gloucestershire County Council identified by DLP Planning, but confirmed as unavailable by the Councils for consideration in **Part 2**. No strategic sites identified in the submission Joint Core Strategy (2014) were specifically assessed at **Part 1**, but two sites promoted as part of the call for sites process are located within a wider proposed strategic allocation site (JCS-A3 South Churchdown).

4.3 As part of the Local Plan process, the Council have conducted several Call for Sites exercise, inviting developers, landowners and businesses to submit sites in the local area that would be available for development over the next 15-20 years, including those potentially available for Gypsy, Traveller and Showpeople accommodation. As part of this study a specific Call for Sites was undertaken to identify potential sites for assessment. The following sites were put forward in these calls for sites:

- TB026 Coach House, Ashleworth
- TB027 Land at Green Lane, Bentham
- TB030 Land off B4063, Old Cheltenham Road
- TB031 Land adjacent to Fire Station, Old Cheltenham Road
- TB032 Land off Kayte Lane, Southam
- TB033 Land adjacent to Gretton View, Alderton
- TB034 Middle Farm, Cold Pool Lane, Hatherley
- TB035 Depot, A38/M50 junction 1
- TB036 Cheltenham Road, Teddington
- TB037 Field at Cursey Lane, Elmstone Hardwick
- TB040 Land at Starcroft Lane, Minsterworth (Already has temporary permission)
- TB049 Land at Haydon Laurels, Gloucester Road, Staverton
- TB050 Land North of Sandhurst Lane, Sandhurst
- TB051 Land at Willowdene, Gloucester Road, Staverton

4.4 In addition to call for sites submissions and existing sites the Council undertook a review of previous and current planning history to identify a series of sites previously or currently the subject of planning applications. The sites included were:

- TB015 Hygrove Place, Extension, Minsterworth
- TB016 North and South Stables, Minsterworth
- TB022 Hillview Extensions, Staverton
- TB038 Downfield Lane, Twyning
- TB039 Land Parcel 7710, Hygrove Lane, Minsterworth
- TB041 Bus Bungalow, Sandhurst Lane
- TB042 The Riders, Minsterworth
- TB044 Fir Tree, Over
- TB045 Slip Road, Teddington Hands
- TB046 Newton Farm, Natton
- TB047 Shurdington Sand Pit, Green Way Lane

4.5 In December 2014, the Council undertook an exercise sending a follow up letter, to all promoters of SHLAA site submissions, to check with landowners as to whether the site could potentially be made available for Gypsy and Travellers and/or Travelling Showpeople use. Following this approach, no additional sites came forward.

4.6 All sites were mapped onto GIS. The study therefore includes a list of all 104 sites initially considered. Maps of Tewkesbury Borough are contained at **Appendix A** showing the distribution of sites that have been subject to assessment.

Capacity

4.7 In this section a list of sites is identified which are considered to be potentially suitable for additional Gypsy, Traveller and Travelling Showpeople pitches and/or plots. All potentially suitable sites have been subject to an initial broad assessment of the number of pitches which could be provided on site. This has taken account, firstly, of:

- Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008);
- Travelling Showpeople's Sites Model Standard Package (The Showmen's Guild of Great Britain, 2007); and
- Any relevant planning history.

4.8 The study has also benefitted from DLP Planning's first-hand experience of the variety of pitch and plot sizes that exist across the country for the various forms of Gypsy and Traveller development, including for residential and transit sites. These have been used to inform the theoretical capacity of sites and optimum size and configuration of pitches (or plots) on site. On larger sites a mix of pitch sizes to reflect the needs of different families can be assumed.

- 4.9 Site capacity has also taken account of on-site constraints and the need, where appropriate, for landscaping and other mitigation measures to achieve a suitable development. Providing good quality landscaping and access arrangements have been taken into account. This will result in sufficient access and accommodation space to create a site which Gypsy, Traveller or Travelling Showpeople find attractive. At the same time, sufficient space and landscaping will help to preserve the residential amenity of neighbouring uses. It should be noted that for strategic allocations and broad locations the capacity of sites has not been identified. Capacity will be subject to specific masterplanning and viability testing for each site and therefore has not been identified at this stage.
- 4.10 The shortlisted sites have been assessed for their capacity to accommodate residential uses for Gypsy and Traveller sites and mixed residential/commercial uses for Travelling Showpeople.

Part 1 Suitability and Availability Matrix

- 4.11 The first stage in the assessment process involved the application of broad suitability criteria, including absolute constraints, together with an initial investigation of likely availability.
- 4.12 The initial assessment of site suitability and availability is summarised in a matrix, which is set out in **Appendix B**. A traffic light approach has been utilised, to identify where sites do not satisfy the criteria in red, where the criteria may be capable of being satisfied in yellow and where the criteria are satisfied in green.
- 4.13 Sites identified as red have not gone forward to be assessed in **Part 2**. 59 sites were rejected in **Part 1** and therefore 45 sites were examined further in **Part 2**.

Part 2 Suitability, Availability and Achievability Site Assessments

- 4.14 **Part 2** involved a more detailed assessment of suitability, availability and an examination of achievability issues.
- 4.15 **Appendix C** sets out those sites where it is considered there is no potential for further provision and the reasons for this decision. **Appendix D** sets out the detailed site assessment results for those sites considered potentially suitable, available and achievable for future provision beyond and within the Green Belt.

Potential Gypsy and Traveller sites beyond the Green Belt

- 4.16 A total of 3 sites located beyond the Green Belt were identified as potentially available and suitable to contribute additional pitches towards meeting future identified needs for Gypsies and Travellers. The results are set out in **Table 6** below:

Table 6 Sites with Potential beyond the Green Belt for Gypsies and Travellers in Tewkesbury Borough

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Capacity
TB025	Land at Claydon Lane	Fiddington	0 pitches (recently granted permanent permission for 2 pitches)	2
TB026	Coach House	Ashleworth	0 pitches	2
TB035	Depot, A38/M50 junction 1	Twyning	0 pitches	15-20*

*20 pitches may be suitable if the site is delivered as a public site.

- 4.17 **Table 7** below sets out sites with potential beyond the Green Belt for Travelling Showpeople:

Table 7 Sites with Potential beyond the Green Belt for Travelling Showpeople in Tewkesbury Borough

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Capacity
TB023	Locks Paddock	Norton	4 plots	4
TB024	Showlands, Evesham Road	Gotherington	17 plots (now permanent)	17

- 4.18 Both sites have recently been granted permanent planning permission, but will contribute to meeting the plots needs in the Borough since the GTAA base date is 2013. Further details on potential sites are set out in **Appendix D** and considered in **Section 5**.

Potential sites within the Green Belt

4.19 A total of 2 sites within the Green Belt were identified as potentially available and suitable sites to contribute additional pitches or plots towards meeting future identified needs for Gypsy, Traveller and Travelling Showpeople subject to insufficient non Green Belt sites being identified. The results are set out below:

Table 8 Sites with Potential within the Green Belt for Gypsy and Traveller and/or Travelling Showpeople use

Site No.	Site Name	Settlement	Existing Provision (including any unimplemented permissions)	Capacity	Use
TB011	Beggars Roost	Bamfurlong Lane	Private authorised - now not in use	15-20*	Gypsy and Traveller
TB049	Land at Haydon Laurels, Gloucester Road,	Staverton	0 pitches	6	Gypsy and Traveller

4.20 All the potential sites within the Green Belt have been assessed for their potential capacity. The results are set out in **Appendix E** and considered in **Section 5**.

5.0 Recommendations and Delivery Options

Pitch and Plot Targets

- 5.1 'Planning Policy for Traveller Sites' (CLG, 2012) requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, to meet likely permanent and transit site accommodation needs arising in each area.
- 5.2 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA), completed by ORS in 2013 details the total identified need for new permanent residential Gypsy and Traveller pitches and Travelling Showpeople plots to meet residential needs between 2013 and 2031 to address the needs of all identifiable households in the whole of Gloucestershire. The results for Tewkesbury Borough are set out in **Table 9** below:

Table 9 GTAA need for Tewkesbury in 5 year time periods

Provision	2013-2017	2018-2022	2023-2027	2028-2031	Total
Gypsy and Traveller Residential Pitches	64	27	29	27	147
Travelling Showpeople Plots	17	1	2	2	22

- 5.3 The Council is now in a position to include local targets in its emerging Borough Plan to reflect the pitch and plot targets identified in the study. It will also be important for the Council to reflect the breakdown in Gypsy and Traveller pitch needs between public (affordable) and private provision.

Table 10 Public/Private Breakdown of Pitch Provision

Gypsy and Traveller Public/Private needs	2013-2017	2018-2022	2023-2027	2028-2031	Total
Public Pitches	20	12	13	12	57
Private Pitches	44	15	16	15	90
Total	64	27	29	27	147

- 5.4 **Table 10** identifies that 57 public pitches are required by 2031, with 20 within the first 5 years (2013-2017). In addition 90 private pitches are required by 2031, with 44 within the first 5 years.

A Supply of Deliverable and Developable Sites

- 5.5 In developing the Local Plan, 'Planning Policy for Traveller Sites' (CLG, 2012) requires local planning authorities to identify and keep up-to-date a supply of specific deliverable sites sufficient to provide five years' worth of sites against those locally set

targets and a supply of specific developable sites or broad locations to meet needs, where possible, for up to 15 years.

Delivery and Distribution of Sites

5.6 It is recommended that the Council should use a priority approach to safeguarding and allocation of potentially suitable sites. DLP Planning recommend that the Council meets the need for Gypsy, Traveller and Travelling Showpeople provision in the following order:

- Safeguard existing sites to prevent their loss to other uses and increase the identified pitch/plot requirement for the Borough;
- Allocate existing sites for intensification beyond the Green Belt (within existing permitted boundaries);
- Allocate new sites beyond the Green Belt;
- Allocate provision as part of strategic sites (within the Green Belt).
- Allocate existing sites for intensification within the Green Belt (within existing permitted boundaries); and
- Allocate new sites within the Green Belt.

5.7 It is recommended that the Council strives to provide suitable new sites (beyond the Green Belt) for new Gypsy, Traveller and Travelling Showpeople provision in the first instance.

5.8 DLP Planning consider that the distribution and delivery of provision across the Borough are important and therefore the selection of site options by the Council should also be guided by the following principles;

- **Fit with needs:** e.g. location of current needs, existing provision and needs of different travelling communities;
- **Viability and timing of delivery of sites:** e.g. financial viability, provision of other policy requirements such as affordable housing and delivery within the first 5 years.
- **How potential sites relate to spatial strategies:** e.g. settlement hierarchy, relationship of sites to sustainable settlements and accessibility to key services;

5.9 The fit with needs is an important consideration and, unlike the housing market, the small scale of need and supply can in some instances require the consideration of the needs of specific families and the appropriate form and location of provision to meet

those needs. DLP Planning are aware of Local Authorities where specific needs remain unmet, whilst sites remain vacant because the sites provided are inappropriate to meet specific needs. DLP Planning recommend that the provision of pitches and plots for Gypsies and Travellers and Travelling Showpeople sites should be managed to ensure a good fit with identified need and enable delivery.

- 5.10 Viability, capacity and delivery of sites, especially strategic sites is a critical consideration for the Council. The study has been unable to identify sufficient specific sites beyond the Green Belt and the Council may be reliant on provision as part of strategic sites to meet needs in the first 5 years and beyond. Delivery of provision as part of these sites will need careful consideration to determine capacity and ensure that both site viability and implementation of Council policy, such as affordable housing or code for sustainable homes requirements are not undermined. Moreover, it is noted that none of the proposed allocated sites can currently be considered as having 'available' status and therefore a firmer policy requirement in the Local Plan would need to be introduced to ensure delivery in particular areas.
- 5.11 In meeting the 5 year requirements, the Council will need sites phased for delivery over the 2013-2017 period to bring forward the Gypsy, Traveller and Travelling Showpeople element of the development before 2017 and also to meet longer term needs in the Plan period between 2017 and 2031. This will require further investigation of both viability and delivery to ensure that site options selected by the Council are both viable and deliverable if they are to contribute towards the Council meeting its statutory requirement to identify sufficient sites. DLP planning acknowledge that strategic sites are unlikely to be able to contribute to meet needs in the first 5 years.
- 5.12 The relative accessibility of sites and proximity to the main towns, villages and key services should be considered by the Council when selecting sites. The level of provision for Gypsy and Traveller (147 pitches) and Travelling Showpeople (22 plots) over the plan period is relatively small compared to the level of provision for other uses such as residential, but the Council should still plan for sustainable development where possible.

Safeguarding Existing Sites

- 5.13 It is suggested that, initially, the Council should consider safeguarding existing Gypsy, Traveller and Travelling Showpeople sites, to ensure that existing needs continue to be met in perpetuity. If sites are lost from these uses, then new replacement sites may need to be found to maintain an adequate supply to meet needs in accordance with the identified pitch and plot targets.

- 5.14 There are 18 existing Gypsy and Traveller sites with full permission within Tewkesbury. It is recommended that these sites are safeguarded in the emerging Local Plan to ensure their continued use.

Table 11 Safeguarding Existing Authorised Gypsy and Traveller Sites

Site ref	Site name	Settlement	Existing Provision
TB001	Cursey Lane	Elmstone Hardwicke	19 pitches
TB002	Showborough	Twyning	10 pitches
TB003	Willows	Sandhurst Lane	48 pitches
TB004a	Vienna	Over	11 pitches
TB004b	Westward	Over	
TB018	Taylor's Yard	Over	
TB019	New Bungalow	Over	
TB005	Field View	The Leigh	16 pitches
TB006	Cherry Orchard	Minsterworth	3 pitches
TB008	Mushroom Farm	Minsterworth	13 pitches
TB009	Hygrove Place	Minsterworth	4 pitches
TB010	Land adjacent Willows	Sandhurst Lane	9 pitches
TB012	Hillview View	Staveton	2 pitches
TB013	Kimberley House	Shuthonger	4 pitches
TB014	Rosebank	Shuthonger	1 pitch
TB020	Treetops	Shuthonger	1 pitch
TB025	Claydon Lane	Fiddington	2 pitches
TB052	Coach House	Minsterworth	2 pitches

- 5.15 There are 2 existing Travelling Showpeople sites that have recently been granted full permission. It is recommended that these sites are also safeguarded in the emerging Tewkesbury Borough Plan to ensure their continued use.

Table 12 Safeguarding Existing Authorised Travelling Showpeople Sites

Site ref	Site name	Settlement	Existing Provision
TB023	Locks Paddock	Norton	4 plots
TB024	Showlands, Evesham Road	Gotherington	17 plots

- 5.16 From the site survey it is clear that these sites are currently in use and are occupied. There appear to be no reasons on the grounds of need why these sites should not be safeguarded in the Tewkesbury Borough Plan. Safeguarding these sites will prevent their loss to other uses and therefore ensure that new site provision is only required to meet future needs.

Site Delivery Options

- 5.17 A number of potential delivery models have been identified and considered for the potentially suitable sites identified overleaf. These include:
- **Delivery model 1:** Existing privately owned sites where there is potential for pitches/plots to be created within the existing site boundaries to meet future immediate family needs. Under this model, planning permission would be needed. The Council should consider encouraging planning applications to meet short and medium term needs through entering into dialogue with site occupants.
 - **Delivery model 2:** Sites which are not currently owned by the travelling communities but have been identified as available for these uses. Allocation in the emerging Borough Plan could identify these sites to travelling communities and they could be purchased on the open market. Alternatively, the Council could consider using New Homes Bonus or other capital monies to buy the site or identify their own public assets and then make them available to organised groups on a non-profit making basis to enable them to develop and manage them. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to provide further sites, as appropriate. There are emerging examples of innovative acquisition and funding arrangements across the country.
 - **Delivery model 3:** New sites where the Council considers that additional affordable pitch provision may be appropriate. In this case, the Council should investigate the potential for either buying sites, developing their public assets or work with other public providers using Government grant funding or other monies to secure or increase affordable provision. Sites could then either be managed by a Council or a Registered Provider (RP).
 - **Delivery model 4:** Provision required as part of the planning of strategic housing or mixed use development sites. This is a requirement in the JCS Policy SA1 'Strategic Allocations Policy' "Proposals will be required to demonstrate how the provision of new Gypsy, Traveller and Travelling

Showpeople sites will be incorporated into development proposals for Strategic Allocations”. There may be opportunity to provide on-site provision for Gypsy and Traveller pitches or Travelling Showpeople plots as part of their overall delivery of development in these locations. These could then be either managed by the Council or RPs, sold on the open market, or affordable pitches brought forward. However, it should be noted that masterplanning and viability testing could ultimately result in some sites potentially not progressing to identification for either Gypsy and Traveller or Travelling Showpeople use.

Sites with Potential (beyond the Green Belt)

- 5.18 A total of 3 sites has been identified beyond the Green Belt as potentially available and suitable for Gypsies and Travellers. **Table 13** sets out the potential sites for allocation. Details of these sites are contained in **Appendix D**.

Table 13 Sites with Potential beyond the Green Belt for Gypsy and Travellers

Site Ref	Site Name	Settlement	Existing permanent pitches / plots	Additional pitches / plots	Plots / Pitches 2013-2017	Plots / Pitches 2018-2031	Delivery option
TB025	Land at Claydon Lane	Fiddington	0	2	2	0	Model 1 – private site
TB026	Coach House	Ashleworth	0	2	2	0	Model 1 – private site
TB035	Depot, A38/M50 junction 1	Twynning	0	15-20*	15-20*	0	Model 1 or 3 public site
TOTAL			0	19-24*	19-24*	0	

*Higher figure based on delivery as a public site.

- 5.19 The study has identified 3 potential sites with capacity to provide up to 24 pitches in the first 5 years. **Table 14** below sets out the identified sites for Travelling Showpeople.

Table 14 Sites with Potential beyond the Green Belt for Travelling Showpeople

Site Ref	Site Name	Settlement	Existing permanent pitches / plots	Additional pitches / plots	Plots / Pitches 2013-2017	Plots / Pitches 2018-2031	Delivery option
TB023	Locks Paddock	Norton	0	4	4	0	Model 1 – private site

TB024	Showlands, Evesham Road	Gotherington	0	17	17	0	Model 1 – private site
TOTAL			0	21	21	0	

5.20 The study has identified 2 sites with potential beyond the Green Belt for Travelling Showpeople. Following the granting of permanent planning permission, these provide capacity for 21 plots between 2013-2017.

Meeting the Needs (beyond the Green Belt)

5.21 The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment 2013 (GTAA) identifies a need for 147 net additional Gypsy and Traveller residential pitches to be developed by 2031, with 64 being required in the first 5 years. The GTAA also identifies a need for 22 additional plots for Travelling Showpeople in Tewkesbury Borough by 2031, with 17 being required in the first 5 years.

Gypsy and Traveller need and supply beyond the Green Belt

5.22 **Table 15** sets out a summary of need and supply beyond the Green Belt for Gypsy and Traveller sites in Tewkesbury Borough.

Table 15 Gypsy and Traveller need and supply (pitches) beyond the Green Belt in 5 year time periods

	2013-2017	2018-2022	2023-2027	2028-2031	Total
(a) Need for Gypsy and Traveller Residential Pitches	64	27	29	27	147
(b) Existing sites with potential beyond the Green Belt	0	0	0	0	0
(c) New sites with potential beyond the Green Belt	24	0	0	0	24
(d) Total potential supply (b+c)	24	0	0	0	24
(e) Shortfall/Surplus (a-d)	40	27	29	27	123

5.23 DLP Planning consider that there are 3 existing sites providing 24 potential pitches beyond the Green Belt which may be suitable for new permanent pitch provision. Overall this is 123 pitches short of the identified need figure of 147 for 2013-2031. This figure is also 40 pitches short of the identified need which should be delivered in the first 5 years. It should be noted that there are two sites beyond the Green Belt currently

subject to undetermined planning appeals, which could potentially contribute towards the defined needs.

Travelling Showpeople need and supply (plots) beyond the Green Belt

5.24 **Table 16** summarises the need and supply beyond the Green Belt for Travelling Showpeople for Tewkesbury Borough:

Table 16 Travelling Showpeople need and supply beyond the Green Belt in 5 year time periods

	2013-2017	2018-2022	2023-2027	2028-2031	Total
(a) Need for Travelling Showpeople Plots	17	1	2	2	22
(b) Existing sites with potential beyond the Green Belt	21	0	0	0	21
(c) New sites with potential beyond the Green Belt	0	0	0	0	0
(d) Total potential supply (b+c)	21	0	0	0	21
(e) Shortfall/Surplus (a-d)	-4	1	2	2	1

5.25 DLP Planning have identified 2 sites providing 21 plots beyond the Green Belt which may be suitable for Travelling Showpeople use. Overall this is 1 plot short of the identified need figure for 2013-2031. This figure is sufficient to meet the plots needs over the first 5 years and beyond to 2027.

Delivery options within the Green Belt

5.26 It is clear that to meet the overall need for Gypsies and Travellers and Travelling Showpeople, the Council may have to consider sites in the Green Belt. Two Green Belt options are set out for the Council's consideration, including:

- Provision via Policy for Strategic Sites within the Green Belt;
- Sites with potential (within the Green Belt);

Provision via Policy for Strategic Sites within the Green Belt

5.27 As set out above, the Council has made the provision of Gypsy and Traveller or Travelling Showpeople uses a policy requirement within strategic sites and currently proposed for allocation in the Joint Core Strategy. Strategic sites have not been specifically assessed within this report, but in principle are considered a potential option to provision for the travelling community.

- 5.28 Whilst promoters may state that sites are unavailable, which would normally preclude the identification of sites due to an unwilling landowner, DLP Planning consider that the allocation of suitable strategic sites for development within the Joint Core Strategy is the key availability consideration in this instance. Development sites should be allocated to meet all the needs of the Local Planning Authority, including housing, employment, retail and Gypsy, Traveller and Travelling Showpeople sites. Therefore, if the Council has a defined need that is unmet, it would be logical that, subject to masterplanning and viability testing considerations, sufficient strategic sites, especially ones beyond the defined urban areas, are identified to meet all needs, including those of the travelling community.
- 5.29 Therefore, to meet the identified need, Gypsy and Traveller and Travelling Showpeople sites could also be required to be provided within suitable housing sites as part of the policy provisions of the Borough Plan building on the proposed Joint Core Strategy Policy SA1 which requires strategic sites to demonstrate how the provision of new Gypsy, Traveller and Travelling Showpeople sites will be incorporated into development proposals for Strategic Allocations. A number of authorities around the country are now planning for future Gypsy and Traveller provision through this delivery option (most recently Teignbridge District Council) and it is recommended that the Council work with developers/promoters to ensure that Gypsy, Traveller and Travelling Showpeople uses are appropriately designed into each scheme and effectively delivered within strategic sites/broad locations.
- 5.30 This approach would require the Council to work with site promoters to establish if sites could be successfully incorporated within site masterplans and layouts. It would also require the Council to consider the financial impact that provision may have on sites and ensure the viability is considered to determine if strategic sites would also be able to deliver other key policy requirements, such as provision of affordable housing. It is therefore recognised that masterplanning and viability testing could ultimately result in some sites potentially not progressing to being identified for either Gypsy and Traveller or Travelling Showpeople use on-site or at all.

Sites with Potential (within the Green Belt)

- 5.31 A total of 2 sites in the Green Belt have been identified as potentially available and suitable. As highlighted earlier, sites in the Green Belt are generally considered to be inappropriate and should only be allocated by the Local Planning Authority when insufficient sites in non-Green Belt locations can be identified to meet locally defined needs. **Table 17** sets out the potential sites within the Green Belt.

Table 17 Sites with Potential within the Green Belt for Gypsy and Traveller or Travelling Showpeople

Site Ref	Site Name	Settlement	Existing permanent pitches / plots	Additional pitches / plots	Plots / Pitches 2013-2017	Plots / Pitches 2018-2031	Delivery option
TB011	Beggars Roost	Bamfurlong Lane	0	15-20*	15-20*	0	Model 1 or 3 – private or public site
TB049	Land at Haydon Laurels, Gloucester Road,	Staverton	0	8	8	0	Model 1 – private site
TOTAL			0	23-28*	23-28*	0	

*Higher figure based on delivery as a public site

5.32 It should be noted that site TB011 is potentially suitable for either Gypsy and Traveller or Travelling Showpeople use. Subject to the identified needs the Council could choose to allocate the site for either use, but not both. Details of this site are contained in **Appendix E.**

Criteria Policy

5.33 To potentially meet any need later in the plan period (e.g. 5 to 15 years) and to provide a base for considering all planning applications, the Borough Plan needs to include a criteria policy. Joint Core Strategy Policy SD14 includes a criteria policy for assessing planning applications. DLP Planning would suggest that this will be sufficient but the Council should include an additional policy in the Borough Plan setting out pitch/plot targets, as set out in the GTAA and identifying safeguarded and allocated sites. In this way they can illustrate the needs and how allocated supply will meet that need.

5.34 Given the extent of the Green Belt in Tewkesbury it is recommend that the Council seeks to identify sufficient sites to meet defined needs over the whole plan period to 2031 rather than relying on the criteria policy to meet needs between 2017-2031. Once adopted the Joint Core Strategy's newly defined Green Belt will continue to be a significant constraint to planning applications for Gypsy, Traveller and Travelling Showpeople use on sites that have not been identified and allocated in the Joint Core Strategy.

5.35 If the Council could identify and allocate a five year supply; e.g. the minimum national policy requirement, they would restrict the remaining provision for the plan period to

sites beyond the newly defined Green Belt. The risk with this strategy is that unless sites beyond the Green Belt come forward, or are identified by the Council in future evidence reviews on this issue, then the Council will be unable to meet requirements to provide sites in the future and could potentially be in a weaker position to deal with unauthorised sites.

5.36 The National Planning Policy Framework (NPPF) is clear that when defining Green Belt boundaries Local Authorities should “satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period” (NPPF para 84). The NPPF also considers development for Gypsy, Traveller and Travelling Showpeople use in the Green Belt as inappropriate. The Council should therefore consider undertaking further work on potential provision within strategic sites within the Green Belt in the Local Plan to meet the needs over the whole plan period to 2031. This would ensure that:

- All the Borough’s defined needs are addressed in the Local Plan;
- The travelling and settled communities would have certainty on the location of future sites;
- The Council would be in a stronger position to deal with unauthorised sites and encampments; and
- Provision would have a better fit with the Council’s spatial strategy which seeks to direct development towards sustainable sites with good access to main towns and key services (which are generally surrounded by Green Belt).

5.37 DLP recommend supplementing JCS Policy SD14 to reflect the findings the needs assessment and this report, to include:

- Targets for Gypsy and Traveller and Travelling Showpeople uses;
- Allocate potential sites;
- Safeguarding of existing sites.
- Criteria for assessing all Gypsy, Traveller and Travelling Showpeople planning applications.

5.38 The box below sets out a template for a supplementary policy in the emerging Borough plan.

<p>Supplementary Policy to SD14 ‘Gypsies and Travellers and Travelling Showpeople’</p>

To meet the identified need, 12 pitches for Gypsies and Travellers and 5 plots for Travelling Showpeople will be provided within the District at the following locations:

Site name	Settlement	Provision	Use	Timescale
Council to insert additional sites to meet needs				

The following existing sites for Gypsy, Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need:

Site name	Settlement	Existing Provision	Use
Council to insert additional sites to meet needs			

All existing authorised sites for Gypsies and Travellers and Travelling Showpeople, will be safeguarded from development which would preclude their continued occupation by these groups, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.

5.39 DLP Planning would also recommend that the Council support Policy SA1 by investigating and identifying which strategic allocations are capable of providing on site provision. This could be included within the specific policy within the emerging Borough Plan or an overall policy for strategic sites following further work on master planning and viability.

5.40 DLP Planning suggest that on-site provision within strategic sites should be capable of appropriate siting within an overall masterplan in most instances when strategic sites are of sufficient scale. In terms of viability, on site provision can be brought forward in a number of ways with varying degrees of financial impact. Three options include:

- Provision of a public site – The most expensive option, as the land and development costs of establishing the site are high compared to the nominal development value;
- Provision of serviced land – The middle road in viability terms, allowing on site provision but with reduced development costs. The site will need to be developed by the Council or other provider such as a registered provider;

- Private sale of land – The cheapest option for on-site provision within strategic allocations. Again reduced development costs, but this time with increased development value following the sale to a private traveller family.

Cross boundary working

- 5.41 The Council has a duty to co-operate with adjacent authorities and, given the difficulty identifying sites for Gypsy, Traveller and Travelling Showpeople use across the Country, DLP Planning would encourage the Council to work with neighbouring local authorities to potentially co-operate on the provision of both Gypsy and Traveller and Travelling Showpeople sites.
- 5.42 The needs of Gypsies, Travellers and Travelling Showpeople do not stop at local authority boundaries and the potential for the delivery of all types of sites (especially public sites) should be explored across these boundaries through the Duty to Cooperate, where appropriate. This is particularly pertinent for adjacent authorities that are also constrained by Green Belt.
- 5.43 The timing of the evidence review is the key consideration for cross boundary working and the production of site assessments to identify specific sites is crucial. Tewkesbury Borough Council should liaise with adjacent authorities, especially those that have undertaken site work to establish if there are site opportunities that could meet the needs of the travelling community across boundaries. The lack of available opportunities to provide Gypsy and Traveller and Travelling Showpeople's accommodation in Tewkesbury Borough in areas beyond the Green Belt are a material consideration in this respect.
- 5.44 The duty to co-operate is not the duty to accept, so the Council will have to be satisfied that adjacent authorities have undertaken robust assessments of both needs and sites to ensure they are not unnecessarily aiding any local authority to avoid providing sites within its own area. Crucially, the very definition of the travelling community, would suggest that this planning use is in fact very cross boundary in nature and DLP Planning would encourage all local authorities to resist the political sensitivities that can prevent the provision of suitable sites.

Transit Site Provision

- 5.45 There are currently no transit sites in Tewkesbury Borough and no transit sites provided elsewhere in the county, where the police could direct unauthorised encampments. The Gypsy and Traveller Accommodation Needs Assessment (GTAA)

does not identify a need for future transit provision in the Borough, but recommends that the Council works with its neighbours to provide transit provision.

Funding

- 5.46 The Government has identified that it is focusing on incentivising councils to deliver new housing, including traveller sites. 'Planning Policy for Traveller Sites' (CLG, March 2012) identified four potential sources of funding for local authorities:
- 5.47 Firstly, the New Homes Bonus scheme which operates in the same way for traveller sites as for other forms of housing. Namely, for every new pitch, a local planning authority will get six years of matched Council Tax funding, with an extra supplement for affordable pitches (such as sites owned or managed by local authorities and Registered Providers).
- 5.48 Secondly, the Homes and Communities Agency (HCA) has allocated £1.7bn, as part of its National Affordable Housing Programme for 2015-18, to fund the provision of affordable housing, including traveller sites. The Homes and Communities Agency has launched its prospectus inviting housing associations, councils, developers and others to bid for a share of grant funding for delivery of new affordable housing outside London. Bids will only be accepted for the provision of new traveller pitches and as with other types of accommodation, the Government does not expect to receive bids for schemes on Green Belt land or other land with special environmental protections.
- 5.49 A proportion of the £1.7bn funding will be retained for future bids through ongoing Market Engagement. This will allow organisations to take the longer timeframes they need to submit funding bids where schemes had not been fully worked up by 30 April 2014 when the formal bid round closed. The HCA website confirms that bidding for further allocations will reopen for continuous market engagement in due course. The HCA approach will encourage bidders to bring forward a higher proportion of firm and realistically deliverable schemes at the outset as it will allow them the flexibility to respond to development opportunities as these arise.
- 5.50 Thirdly, the introduction of the Community Infrastructure Levy (CIL) could provide a further potential funding source for enabling works required to deliver Council priorities, should the Council choose to introduce a CIL for the Tewkesbury Borough area.
- 5.51 Fourthly Joint Core Strategy Policy SA1 requires Strategic Allocations to support the provision of Gypsy, Traveller and Travelling Showpeople provision. In instances where on-site provision is not appropriate e.g. it cannot be successfully masterplanned or

would have a significant impact on viability, then a financial contribution would represent a potential source of funding to help the Council deliver sites elsewhere.

Delivery and Management

- 5.52 In general DLP Planning can confirm that it can be difficult to find organisations willing to manage public sites in Gloucestershire. The County Council is no longer taking on any new sites and Local Authorities are not currently showing any appetite to manage sites. DLP Planning are also unaware of any Registered Providers managing any sites in the County.
- 5.53 There is currently a waiting list for public site provision in Tewkesbury Borough. There are 10 families on the waiting list for a public site in Tewkesbury and the GTAA identifies a need for 57 pitches over the 2013-2031 time period. The Council must remain aware that, this type of site will be required in the future and it should consider putting measures in place to enable public delivery.
- 5.54 It is recommended that the Council discuss the potential delivery and/or management of Gypsy, Traveller and Travelling Showpeople Sites with existing RPs active in the County to determine if this is an option. There is also the potential for the County Council to resume taking on additional public sites, but this would need a co-ordinated and well evidenced support from the local authorities within Gloucestershire to approach the County Council to influence a policy change in this respect.
- 5.55 The Homes and Communities Agency (HCA) is also a potential partner to deliver sites. The study has not been made aware of any HCA owned sites within Tewkesbury Borough Council, but in other Local Authority areas, the HCA works with Councils to deliver new sites.
- 5.56 There are also emerging examples nationally of local planning authorities planning for the future provision of sites for travelling communities by allocating urban extension sites for housing and traveller pitches, requiring developers to design and layout serviced pitches/plots for private sale to Gypsies, Travellers or Travelling Showpeople. Where there is a demonstrable need for provision, some local planning authorities are identifying a need for developers to provide pitches/plots or commuted sums as part of the overall benefits package required for new development sites. Mid Sussex Council, and Teignbridge District Council have specifically set out this requirement in adopted policy for a future urban extension.
- 5.57 There are also innovative delivery models being developed in other parts of the country, such as Elim Housing in the West of England and Rooftop Housing in

Evesham, which could provide for the funding of initial sites to be recycled to provide for further sites, in the same way that affordable housing has been delivered by housing bodies for some years. For example, the Council could consider using New Homes Bonus or other monies to buy a site or identify their own public assets and then make them available to organised Gypsy and Traveller groups on a non-profit making basis for them to develop and manage. Such groups could also be offered the opportunity to buy stakes in the site, allowing the income from such sales to be recycled to provide further sites.

- 5.58 The Council should investigate these sources of funding and delivery options further, in partnership with Registered Providers and other delivery partners.

Phasing and Monitoring

- 5.59 As with other forms of development, the release of Gypsy, Traveller and Travelling Showpeople sites should be managed to ensure that it corresponds with identified need.
- 5.60 The Council could potentially identify sufficient sites to meet needs within the plan period dependant on the outcomes of consideration of options for delivery within the Green Belt. It will be necessary to revisit the identification of sites if sites prove to be undeliverable. DLP Planning suggest that it would be prudent for the Council to identify a potential reserve of sites or extension of existing sites which could be brought forward in the future if required, rather than wait for the need to be established and then start a review of the development plan at that time.
- 5.61 Once the Council has identified and allocated enough sites, active monitoring of supply against need on an annual basis, as required by 'Planning Policy for Traveller Sites', would determine the need for any potential release of land to meet future needs. To ensure that it is able to demonstrate that it has an up to date understanding of local needs, the Council should also undertake periodic review of its needs evidence base via an updated GTAA on needs.

6.0 Appendix A: Site Location Plans

7.0 Appendix B: Part 1 Assessment Matrix

8.0 Appendix C: Rejected Sites List

9.0 Appendix D: Sites with Potential beyond the Green Belt

10.0 Appendix E: Sites with Potential within the Green Belt

BEDFORD - BRISTOL - CARDIFF - EAST MIDLANDS - LONDON - MILTON KEYNES - SHEFFIELD

BEDFORD

4 Abbey Court
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