

## **Matter 4: Provision for Gypsies & Travellers and Travelling Showpeople**

Issue: Whether the TBP provides the quantity and distribution of pitches and plots for Gypsies, Travellers and Travelling Showpeople required by the strategic policies of the JCS.

### Question

**4.1 Given the evidence of the Gloucestershire GTAA 2017, taking account of existing commitments and possible windfall sites, does the TBP make sufficient provision for gypsies, travellers and travelling showpeople in accordance with the requirements of JCS Policy SD13 and Planning Policy for Traveller Sites (PPTS) 2015?**

### TBC Response

- 4.1.1 The Gloucestershire Gypsy and Traveller Accommodation Assessment (GTAA) 2017 undertaken by Opinion Research Services (ORS), identified a total need for 78 pitches, in Tewkesbury Borough, from a baseline of March 2016 to the end of the plan period 2031.
- 4.1.2 The need covers those who meet the planning definition of a traveller in accordance with the PPTS and a wider culturally specific duty to address the housing need for those who do not meet the definition.
- 4.1.3 The need was assessed through a GTAA (Examination document EB006), through a combination of desk-based research and engagement with members of the travelling community living on all known sites and yards. A total of 96 interviews were completed with Gypsies and Travellers and a further 28 were completed with Travelling Showpeople living on authorised and unauthorised sites and yards.
- 4.1.4 However, as well as calculating need for interviewed households that meet the planning definition, the needs of the households where an interview was unable to be completed (either due to refusal to be interviewed or households that are not present during the fieldwork period) was assessed as part of the GTAA where they were believed to be Gypsies and Travellers who may meet the planning definition.
- 4.1.5 Whilst there is no guidance that sets out how the needs of these households should be addressed; an approach was taken that seeks a best estimate of current and future need from these households. The estimate sought to identify current need from any pitches known to be temporary or unauthorised, and to estimate future need through new household formation. For the latter, the ORS national household formation rate of 1.50% was applied as the demographics of residents were unknown, and consideration was also given to the locally derived new household formation rates if these differed significantly from the ORS national rate.
- 4.1.6 ORS have now completed approximately 4,800 interviews with Gypsies and Travellers on sites across England and the proportion of households that meet the planning definition is approximately 30%, suggesting that the majority of households that are interviewed across the country are settled and do not meet the planning definition of a Traveller.

4.1.7 Figure 1 shows that Tewkesbury Borough Council is required to provide 19 pitches for those who meet the PPTS definition. This includes the travelling households and 30% of those not known (the number of which, for each 5 year period is shown in red numbers in brackets).

Figure 1

	2016-2021	2021-2026	2026-31	Total
Travelling Households	4	0	1	5
Non-Travelling Households	14	5	6	25
Not known	25 (7.5)	11 (3.3)	12 (3.6)	48
<b>Sub Total</b>	<b>43</b>	<b>16</b>	<b>19</b>	<b>78</b>
<b>Total need of those who meet PPTS position (with 30% not known)</b>	<b>11.5</b>	<b>3.3</b>	<b>4.6</b>	<b>19.4</b>

4.1.8 Permission has already been granted for 29 pitches for gypsies and travellers, which means that TBC have already met their requirement for those who meet the definition for the Plan period. Whereas for travelling showpeople permission has been granted for 9 pitches leaving a shortfall of 15 pitches.

4.1.9 It can therefore be argued that Tewkesbury Borough Council has met their requirement for those meeting the definition of a traveller; there is a minor shortfall for travelling show people pitches; which can be addressed by an enabling strategic policy: Policy SD13 of the JCS which provides enabling criteria to allow pitches to come forward to provide for additional need.

4.1.10 Further to this, an updated study on the assessment of need for Gypsy, Travellers and Travelling Show people is currently being commissioned on a county wide basis. A final report is expected in late Summer of this year. Once the need is established through this study, a Gypsy, Travellers and Travelling Showpeople accommodation assessment, will be produced. These studies will both provide an update to the need across the county and provide a basis for providing for that need on a county wide basis in accordance with the duty to co-operate. This data will also feed into the JCS review and inform the Gypsy and Travellers and Travelling Showpeople policy.

#### Question

**4.2 On adoption of the TBP, would there be an identified five year supply of specific, suitable and deliverable sites, and a sufficient supply of developable sites thereafter?**

TBC Response

4.2.1 Figures 2 and 3 below set out the five year housing land supply for gypsies and travellers and travelling showpeople. Ahead of the findings of an updated GTAA (needs assessment) all calculations are based on the need identified in the 2017 ORS Gloucestershire GTAA.

Figure 2	Five year period			Total
	2016-2021	2021-2026	2026-2031	
Tewkesbury Gypsy and Traveller Need Identified within GTAA 2017 (those who meet the definition only)	4	0	1	5
Temporary to Permanent Conversions Granted	9	0	0	9
Permissions Granted	22	0	0	22
Tewkesbury Borough Plan Sites	7	11	12	30
<b>X = Total Supply</b>	<b>38</b>	<b>11</b>	<b>12</b>	<b>61</b>
<b>+ / - 5-year period</b>	<b>34</b>	<b>11</b>	<b>11</b>	
<b>5YLS = X/Y*5</b>	<b>47.5</b>	<b>90.0</b>	<b>60.0</b>	

Figure 3	Five year period			Total
	2016-2021	2021-2026	2026-2031	
Tewkesbury Travelling Showpeople Need Identified within GTAA	18	3	3	24
Temporary to Permanent Conversions Granted	0	0	0	0
Permissions Granted	0	0	0	0
Tewkesbury Borough Plan Sites	9	0	0	9
<b>X = Total Supply</b>	<b>9</b>	<b>0</b>	<b>0</b>	<b>9</b>
<b>+ / - 5-year period</b>	<b>-9</b>	<b>-3</b>	<b>-3</b>	
<b>5YLS = X/Y*5</b>	<b>2.5</b>	<b>0.0</b>	<b>0.0</b>	

4.2.2 For gypsies and travellers, the 5 year land supply has been calculated including the conversion of 9 established temporary pitches to permanent, permanent planning permissions for 22 pitches since 2016, and pitches allocated within the Pre-Submission Tewkesbury Borough Plan. This shows that the Tewkesbury Borough Plan has met and exceeded the requirement of supply for gypsies and travellers who meet the definition. However, the surplus in supply,

along with the enabling criteria in JCS Policy SD13 will be used to address those gypsies and travellers needs who do not meet the definition. With regard to Travelling Showpeople there is an undersupply of 15 pitches which will be addressed through the enabling policy of the JCS, and the updated GTAA.

- 4.2.3 In addition, within Tewkesbury Borough privately owned sites continue to come forward through the development process as well as remaining temporary pitches that have applied for permanent permission. Figure 4 below shows the applications permitted for Gypsy and Traveller and Travelling Showpeople since April 2016. Highlighted are those sites that are also local plan allocations. 22 pitches are identified as sites in Tewkesbury Borough. These pitches comprise of those which have gained planning permission since April 2016.

**Figure 4**

Planning Ref	Site Name	On Local Plan Allocation Site?	Total Pitches
19/01194/FUL	Land East of Old Gloucester Road Staverton Gloucestershire GL51 0TG	Yes	9
16/01285/FUL	Brookside Stables	No	7
16/00257/FUL	Part Parcel 7812 Lawn Road Ashleworth	No	2
15/00693/FUL	Starcroft Lane Minsterworth	No	4
15/00481/FUL	The Paddock Cheltenham Road Teddington	No	4
14/00926/FUL	The Paddocks Downfield Lane Twyning	No	2
17/00083/FUL	Parcel 7710 Hygrove Lane Minsterworth	Yes	5
16/01360/FUL	The East of The Lodge Hygrove Lane Minsterworth Gloucester Gloucestershire GL2 8JG	Yes	5
<b>Total</b>			38

Question

- 4.3 Policy GTTS1 allocates three sites for Gypsies and Travellers and one site for Travelling Showpeople. How have these sites been identified from amongst reasonable alternatives?**

TBC Response

- 4.3.1 The assessment of Gypsy and traveller sites adopted the methodology developed as part of the work undertaken by DLP Planning on behalf of Tewkesbury Borough Council in 2015 to carry out a site search assessment, (Gypsy, Traveller and Travelling Showpeople Site Search Study Examination Document EB029). A public consultation was undertaken specifically on the methodology, and amendments were made as a result of comments received before the methodology was finalised and applied to potential sites.
- 4.3.2 Sites submitted for Gypsy, Traveller and/or Travelling Showpeople uses from previous Local Plan call for sites, along with the specific sites resulting from the 2015/2016 call for sites were taken forward for assessment. Requests were made for the identification of sites in public ownership, being considered for disposal, to both Tewkesbury Borough Council and Gloucestershire County Council. All owners of sites submitted for housing or employment were also contacted to establish if those sites could also be available for Gypsy, Traveller and Travelling Showpeople use. This process resulted in 19 potential sites being assessed.

4.3.3 The assessment was carried out in two parts:

4.3.4 **Part 1 Assessment** – A desk based assessment which involved the consideration and application of broad suitability criteria, including absolute constraints and an initial investigation of likely availability. 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 the impact on International Environmental Designations, Scheduled Ancient Monuments or Flood Zones 3 a and b. The output from the Part 1 Assessment was recorded in an assessment matrix, which is shown in Examination Document EB005a in Appendix C. The matrix used a Red, Amber, Green (RAG) rating, identifying sites that do not satisfy the criteria in red; those where the criteria may be capable of being satisfied but require further investigation in Amber; and those that we are confident satisfy the criteria in Green.

**Part 2 Assessment** – This was a more detailed assessment of suitability, availability and developability as a result of consultation with officers of Tewkesbury Borough Council, Gloucestershire County Council and other Statutory Bodies, and a SA assessment. 19 sites underwent the part 1 assessment, which provided 9 sites for part 2 assessment. Details of the SA assessment is summarised in table 6.4 of the main SA report (Examination Documents CD006). Table 6.5 of the SA report summarises the reasons for selection or rejection of the different site options and is shown below.

4.3.5 **SA report: Table 6.5: Gypsy, Traveller & Travelling Showpeople Site Options Summary Reasoning for Selection or Rejection**

Site Option	Outline reasons for selection or rejection as a preferred site allocation option at Revised Regulation 18 TBP stage
Minsterworth	
The Lodge (A) & Pound Lane (C)	Not progressed as not available, suitable, or achievable.
Hygrove Place (B)	Progressed with a capacity for 7 pitches deliverable for travellers, with no insurmountable constraints that cannot be mitigated to prevent the site providing a sustainable option for meeting housing needs.
Gotherington	Progressed as an existing site with planning permission for travelling showpeople with potential for intensification.
Over	Not progressed as site has planning permission for residential development and therefore unlikely to come forward as a site for gypsy and travellers.
Tredington	Not progressed as site forms part of a proposed site allocation for residential development in the TBP.
Coombe Hill	Not progressed as uncertainty over achieving a safe and suitable access on to Stoke Road.
Staverton	Progressed with a capacity for 15 pitches deliverable for travellers, with no insurmountable constraints that cannot be mitigated to prevent the site providing a sustainable option for meeting housing needs.
Uckington	Not progressed as site within Green Belt, area of significant flood risk and uncertainty over the availability of land for development.

The Leigh	Progressed with a capacity for 8 pitches deliverable for travellers, with no insurmountable constraints that cannot be mitigated to prevent the site providing a sustainable option for meeting housing needs.
Badgeworth (A)	Progressed with a capacity for 7 pitches deliverable for travellers, with no insurmountable constraints that cannot be mitigated to prevent the site providing a sustainable option for meeting housing needs.

4.3.6 Paragraph 6.49 of the SA report concludes that: Policy GTTS1 helps to meet the needs identified in the Gloucestershire Gypsy and Traveller Accommodation Assessment for the Plan area (2017) and will comply with higher level JCS Policies on gypsy and travellers. Overall, the Policy will have long-term positive effects for gypsy and traveller communities by providing new pitches and safeguarding plots.

Question

**4.4 Turning to these four sites, in each case:**

**What is the current use of the site and is there any relevant planning history? Are there any current planning applications or appeals?**

TBC Response

4.4.1 The table (Figure 5) below details the current use of the allocated sites and any relevant planning history, current planning applications or appeals.

**Figure 5**

Site Name	Current Use of Site	Relevant Planning History	Current Planning Applications	Current Appeals
Land adjacent to Hygrove Place, Hygrove Lane, Minsterworth	Gypsy and Traveller Pitches	Permitted 16/01360/FUL Change of Use of Land to a Gypsy Site for 5 family pitches.  Permitted 17/00083/FUL Variation of Condition 2 of Planning application 13/01216/FUL to allow a change to the layout and variation of condition 4 to allow an increase in Gypsy and Traveller pitches from 5 to 10.	None	None
Land adjacent to Fieldview, A38, The Leigh	Residential Caravan Site and Motorhome Sales/ Repairs	Application Withdrawn 18/00580/FUL Change of use of land for the siting of 8 no. caravans for gypsy and traveller use, and the provision of associated vehicular parking, acoustic fencing and landscaping  Permitted 19/00076/FUL	None	None

		Change of use of caravan site and part of landscape area to motorhome sales and repairs, change of use of existing dwelling to associated sales and office use, installation of solar panels on front elevation roofslope of existing building, provision of hardstanding to provide extended vehicular display area and provision of customer and staff parking area in association with the sale of motorhomes, and provision of associated landscape works		
Hillview, Bamfurlong Lane, Staverton (Green Belt)	Residential Caravan Site	None	None	None
Land off Old Gloucester Road, Staverton (Green Belt)	Vacant Agricultural	Permitted 19/01194/FUL Change of use of land to provide 9 Travelling Showperson's plots and associated works including hardstanding.	None	None

**4.4.2 Is the allocation justified given the site selection criteria in JCS Policy SD13, relevant constraints, infrastructure requirements and potential impacts such as visual impact and highway safety? Will the site have an acceptable environment for residential use? Will the site, together with others, dominate the nearest settled community contrary to PPTS paragraph 14?**

TBC Response

4.4.3 The allocated sites are small and provide accommodation for the particular needs of gypsies, travellers and travelling showpeople. The Council has investigated options for these particular housing needs and confirmed the proposed allocations that will best meet with such needs. The Policy GTTS1 makes clear that the allocation of these sites is solely for the residential use of Gypsies and Travellers and only development ancillary to their residential use will be permitted

4.4.4 The table below is taken from table 6.4 of the Pre—Submission Plan SA report (Examination Document CD006). It provides an assessment of the selected sites for gypsies and travellers with regard to a number of approved criteria.

4.4.5

SA Objectives	Housing	Economy & Employment	Healthy Communities	Access to Services, Facilities and Employment	Access to Public Transport	Traffic	Air Quality and Climate Change	Water Quality	Flooding	Biodiversity	Landscapes	Cultural Heritage	Land and Soils	
	1	2	3	4	5	6	7	8	9	10	11	12	13	
Site Ref / SHLAA Ref	Size (ha)	Sustainability Appraisal Findings												
MINSTERWORTH														
TB015: Hygrove Place	n/a	+	0	-?	--	+	0	0	0	0	0	0	0	+
STAVERTON														
TB012 Hillview	n/a	+	0	--	--	-	0	0	0	0	0	0?	0	++
Land off Old Gloucester Road	1.7	+	+	-	-	-	0	0	0	0	0	0	0	+
THE LEIGH														
Land adjacent to Fieldview, A38	n/a	+	-?	-	--	+	0	0	0	--	0	+	0	++

Table 2.2: SA Significance Key

4.4.6

Categories of Significance of Effects		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects



-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

Turning in turn to each of the sites the following analysis is provided in response to the questions:

- 4.4.7 • **Land adjacent to Hygrove Place, Hygrove Lane, Minsterworth**  
 There are 3 existing sites in Minsterworth, and the sites are popular with the gypsy and traveller community. The sites are tucked away and do not dominate the settlement of Minsterworth. The existing sites provide the necessary infrastructure and have been shown to provide an acceptable environment for residential use.
- 4.4.8 The proposed allocation is an intensification and extension to the site that is closest to the road, allowing good accessibility. The site is currently used for storage by the gypsy and traveller community.
- 4.4.9 The site is unconstrained, has no environmental designations; is not in green belt or an area of landscape sensitivity or flood risk and is unlikely to affect flood risk in the surrounding area. The site is adjacent to residential amenity and the GTAA study therefore recommended that, due to the sensitive nature of residential development, it should be set back from the Main Road (A48) boundary side of the site. This factor would also provide highway safety from residents.
- 4.4.10 The site however is not located within reasonable walking distance of services, facilities or employment opportunities, and the settlement does not contain shops, health care services so there would be increased reliance on the private car. However, there are regular services to Gloucester and Coleford which can help reduce the reliance on private vehicle. The village is well situated being less than 5 miles from Gloucester, 4 miles from Gloucester Station, and has good access to the A48. The village did have a primary school, but this shut down in 2017 due to a lack of pupils, and the nearest primary school is at Churcham – just over a mile away. The site therefore has good accessibility to schools and amenities.
- 4.4.11 The application for this site has now been permitted to allow an increase in Gypsy and Traveller pitches from 5 to 10.
- 4.4.12 • **Land adjacent to Fieldview, A38, The Leigh**  
 This is an existing allocation that has not yet been developed. The site is an extension to the existing site. The existing site therefore provides the necessary infrastructure and has been shown to provide an acceptable environment for residential use. The site lies outside the village of the Leigh, and therefore does not adversely impact upon the residential amenity of the village. A draft neighbourhood plan for the Leigh provides that: Within the community is a small well run traveller site (Field View Caravan Park) that has existed for many years’.

- 4.4.13 The site has good accessibility to the A 38 and the village of The Leigh lies 5 miles equidistant from the towns of Tewkesbury and Cheltenham and the city of Gloucester. With a garage, shop, pub and farm shop at Coombe Hill, and bus services to the main towns, the vast majority of the population currently rely on their motor cars to commute for work, shopping, schools, and other services. Children of the village go to either the schools of Norton or Apperley, a few miles away.
- 4.4.14 The site is not in the green belt or an area of landscape sensitivity. However, the site is entirely located within flood zone 2, and therefore a major negative effect was considered for SA Objective 9. However, the site will need to comply with other TBP Policies, including ENV2 Flood Risk & Water Management – thus providing mitigation measures that should reduce the risk towards neutral.
- 4.4.15 The site is on brownfield land such that the SA found major positive effects through use of previously developed land. The previous SA had found uncertain neutral effects for biodiversity. However, with the updating of the TBP Policy NAT1, all development should provide some biodiversity gain in line with national requirements.
- 4.4.16 A planning application proposing the change of use of land adjacent to Fieldview Bungalow for the siting of 8 no. caravans for gypsy and traveller use, and the provision of associated vehicular parking, acoustic fencing and landscaping, was submitted in June 2018 (reference 18/00580/FUL). The application was later withdrawn on 29th August 2018 after the Environment Agency (EA) had advised that, due to the combined factors of flood risk and flood vulnerability, the development was required to pass the Exception Test. The EA raised an objection to the application based on the grounds of insufficient information being provided in the Flood Risk Assessment to enable a robust assessment of the safety of the site to be undertaken, which was key to inform the Exception Test.
- 4.4.17 A further application ( 19/00076/FUL) was received in January 2019 and approved in July 2019 for extension of an existing garage and motor showroom on the site which would provide for a change of use of part of this site to motorhome sales and repairs, and associated works. As noted above, the Certificate Plan attached to the decision notice for reference 97/0957/0437/CLE covers the same parcel of land as the current application. Whilst this plan shows that the parcels of land within the application site identified as (b) and (c) included motor vehicle sales and repairs, parcels (a) and (d) were not shown as being used for these purposes; the Certificate Plan shows these parcels of land being used as 'caravan site' and 'landscaping' respectively. As such, the application proposes a material change of use of parts of these parcels of land within the application site to motorhome sales and repairs.
- 4.4.18 • **Hillview, Bamfurlong Lane, Staverton (Green Belt) and**  
This is an existing site and is proposed for extension and intensification for the use of the site. The existing site therefore provides the necessary infrastructure and has been shown to provide an acceptable environment for residential use.

- 4.4.19 The site lies just outside of and to the south of the village of Staverton and will therefore not affect the residential amenity of the village. The site is adjacent to the Gloucestershire airport, and given this proximity, will therefore not have a significant adverse impact on the undeveloped nature of the green belt.
- 4.4.20 The site has good access to the surrounding principal highway network in accordance with policy SD13. The site however is not located within reasonable walking distance of services, facilities or employment opportunities, and the settlement does not contain shops or health care services so there would be increased reliance on the private car. However, the village is well situated being less than 7 miles from Gloucester and 6 miles from Cheltenham and has good access to the A40 and M5. The site is not in an area of or flood risk and is unlikely to affect flood risk in the surrounding area.
- 4.4.21 • **Travelling showpeople site: Land off Old Gloucester Road, Staverton (Green Belt)**  
The site lies just outside of and to the north of the village of Staverton and will therefore not be a dominant feature in the village.
- 4.4.22 The site is adjacent to Old Gloucester Road and has good access to the surrounding principal highway network in accordance with policy SD13. The site however is not located within reasonable walking distance of services, facilities or employment opportunities, and the settlement does not contain shops, health care services so there would be increased reliance on the private car. However, the SA report (Examination Document CD006) noted that these plots are for travelling showpeople who wish to live a traditional and more nomadic way of life. The village itself has good highway connections and is well situated being less than 7 miles from Gloucester and less than 6 miles from Cheltenham and has good access to the A40 and M5.
- 4.4.23 The site is not in an area of flood risk and is unlikely to affect flood risk in the surrounding area. However, the site is in the Green Belt and effectively in an area of open countryside however the site is not within or adjacent to the AONB and mitigation is available through JCS and TBP Policies to protect the landscape character of the area and prevent significant negative effects. The SA provided that with the relatively small size of the proposed allocation has a residual neutral effect. In addition, the site is for travelling show people who by their very nature reside on the site on a temporary basis, and any adverse impact will therefore be minimised.
- 4.4.24 The site has been granted planning permission to provide 9 Travelling Showperson's plots and associated works including hardstanding.

**4.4.25 • Are the landowners' intentions clear? Is the site available and likely to be delivered during the plan period?**

TBC response

4.4.26 The DLP Study (Examination Document EB029) assessed the availability and the deliverability of the sites through a rigorous assessment process which is illustrated in this document in chapters 3 and 4. This was supplemented by the SA assessment which is illustrated in response to question 4.4 above

**4.4.27 • Is the indicative capacity figure for the allocation justified? Is the scale of the site suitable for management purposes?**

TBC response

4.4.28 The DLP report (Examination Document EB029) noted in paragraph 2.7 that 'although there is no national definition of what size a pitch should be, a general guide contained in Designing Gypsy and Traveller Sites<sup>1</sup> 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.

4.4.29 However, whilst there are currently no national standards for Traveller's Pitches (since the Ministerial Statement of 31st August 2015, which withdrew the DCLG 'Designing Gypsy and Traveller Sites – Good Practice Guide', 2008a), the London Gypsy and Traveller Unit Working Paper 'Net density and Gypsy and Traveller sites in London' (2009) says, "Suggested net densities for new Gypsy and Traveller sites lie in the range 21-29 pitches/ha (ppha)", "The densities of London's older sites, developed between 1968 and 1997, average out at 34 ppha (Inner London) and 31 ppha (Outer London)" and "New sites in Inner London Boroughs have densities of 14-25 ppha".

4.4.30 The allocations in Policy GTTS1 result in the following 'Pitches Per Hectare (ppha)':

- a) Land adjacent to Hygrove Place is 0.4 ha with 7 pitches which gives a density of 18 ppha (17.50)
- b) Hillview Bamfurlong Lane is 0.89 ha with 15 pitches which gives a density of 17 ppha (16.85)
- c) Land adjacent to Fieldview A38 is 0.37 ha with 8 pitches which gives a density of 22 ppha (21.62)

The indicative capacity of each of the sites falls within the recommended range

4.4.31 The Guidance for Travelling Showpeople's Yards and Plots can be found in 'Travelling Showpeople's Sites Model Standard Package' (The Showmen's Guild of Great Britain, 2007). and shows that densities are lower for these sites:

4.4.32 A single residential unit / Showperson Plot will comprise:

- Everything identified for a Traveller’s Pitch; plus
  - A Yard, generally shared, for Fairground Vehicles and Equipment manoeuvring and storage;
  - Workshops / Garages for the maintenance of Fairground Vehicles and Equipment; and
  - Internal road layout / circulation space for the safe entry, manoeuvring and egress of Fairground Vehicles and Equipment.
- 4.4.33 Land off Old Gloucester Road, Staverton is 1.7 ha with 9 Plots which gives a density of 5 ppha (5.29).
- 4.4.34 There is a balance as to the size of the site for management purposes: too large – and there is the potential for antisocial behaviour as ODPM (2003) say “Up to about 15 pitches it is easier to avoid mixing incompatible families, making sites easier to manage” when considering Local Authority sites rather than private sites in England: too small – and if it isn’t a ‘single’ family site then they may not be able to justify site management and as ODPM (2003) says “Sites smaller than ten pitches might leave residents feeling vulnerable” again when considering Public sites. However, this allocation is considered suitable as it is a privately owned site and has been granted permission for 9 pitches.
- 4.4.35 • **In the case of the two sites within the Green Belt, should the sites be inset into the Green Belt to comply with PPTS Policy E and, if so, are there exceptional circumstances which justify this? If not, would the ‘very special circumstances test’ frustrate delivery?**

TBC response

- 4.4.36 It is not proposed to remove the sites from the Green Belt, but rather to allocate them within the Green Belt. Removal could open the land up to other development uses and possibly increase the value of the land. Further, there are other gypsy and traveller sites that exist within the green belt, and that are not allocated as such. These include Beggars Roost, Bamfurlong Lane, (a tolerated site); the existing Hillview Site at Staverton; Brookside Stables, a temporary permission of four years at Badge worth; and The Barn at Uckington (an authorised site).

Question

- 4.5 Is there a need for the provision of any transit gypsy and traveller pitches, and if so, are there any suitable sites for allocation, or should Policy GTTS1 be reworded to allow for suitable sites to come forward?**

TBC Response

- 4.5.1 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the CLG Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring local authorities and other stakeholders were also taken into consideration when determining this element of need in the study area.

- 4.5.2 The Study found that there was 1 private transit site with 7 pitches in Tewkesbury at Land at Starcroft Lane.
- 4.5.3 However, 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
- 4.5.4 In terms of looking at need for transit sites, it was suggested by a number of organisations and individuals representing the Travelling Community that there would be a need to increase transit provision across the country as a result of changes to PPTS leading to more households travelling, seeking to meet the planning definition. The GTAA concluded that this may well be the case but it would take some time for any changes to pan out. As such the use of historic evidence to assess future transit need was not recommended at the time. Instead the GTAA provided that any recommendation for future transit provision would need to be made using a robust post-PPTS (2015) evidence base and there had not been sufficient time yet for this to happen. The update to the GTAA will obviously take this into account.