



Wycombe District Local Plan (Regulation 19) Publication version

Topic Paper 10: Meeting the need of travellers

October 2017

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1.0 Introduction

Purpose of the Report

- 1.1 This topic paper is one in a series. The subject of this topic paper is how we have developed the strategy to addressing our needs for traveller site provision within the Wycombe District Local Plan (Regulation 19) Publication Version (October 2017). Each topic paper will look at the relevant national and local guidance that informs the Publication Draft Local Plan. Topic papers explain how the strategy has developed and the information, evidence and feedback that has informed the choices made in formulating the policies and also sets out what we foresee as the key issues and how these have been resolved.
- 1.2 Government policy requires local planning authorities to set targets for traveller pitch provision which address the likely permanent and transit site accommodation needs of travellers in their area. It also requires LPAs to provide a supply of traveller sites against these locally-set targets.
- 1.3 This paper sets out an overview of these targets, and an explanation of the strategy which WDC is proposing to use to meet them.

2.0 Policy Context

National Policy

- 2.1 Paragraph 159 of the NPPF sets out that Local Authorities should set out an assessment of their housing market, and that this should address

the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes),³⁴

Footnote 34 extends this requirement to assess the need for all types of housing to also considering the need for travellers' accommodation.

2.2 National planning policy on traveller sites is outlined in the statement Planning Policy for Traveller Sites (PPTS) (2015), which is to be read in conjunction with the NPPF¹.

2.3 PPTS gives the planning definition of a Gypsy or Traveller as:

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 dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2.4 PPTS gives the planning definition of a travelling showperson as:

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 own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

2.5 Critically, the planning definitions as presented exclude those who have ceased to travel permanently. However, the Housing and Planning Act (2016) confers on local planning authorities (LPAs) a duty to consider the needs of people residing in their district with respect to sites where caravans may be located. The Equalities Act 2010 also sets out that Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation.

¹ National Planning Policy Framework (2012) paragraph 4 sets out the connection between the two documents.

2.6 The PPTS states that local planning authorities (LPAs) should:

- Prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan, working collaboratively with neighbouring local planning authorities;
- Use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions;
- Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring LPAs;
- Identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally-set targets;
- Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density
- Protect local amenity and environment, including strictly limiting new development in open countryside that is away from existing settlements.
- Not approve development in the Green Belt except in very special circumstances (nothing that the best interests of children, personal circumstances, or unmet need are unlikely to clearly outweigh harm to the Green Belt).
- Set criteria to guide land supply allocations where there is identified need and criteria-based policies to provide a basis for decisions on planning applications which come forward.

2.7 The PPTS also contains a range of more detailed guidance for the selection and assessment of sites and site proposals. An overview of this guidance is set out in the later section of this report which covers the criteria for site assessments.

2.8 The NPPF, together with the national Planning Practice Guidance (PPG), also contains guidance on a range of other issues which should be considered in the formulation of a planning strategy for meeting the needs of travellers. These include:

- Flood risk
- Health and well-being
- Noise
- Land affected by Contamination
- Water supply, wastewater and water quality

3.0 How did the strategy evolve?

- 3.1 The new Local Plan includes the delivery of housing as one of its strategic objectives. This is defined as providing for the specific housing needs of the community, which includes the needs of the travelling community.
- 3.2 This strategic objective is reflected by the provisions of core policy CP4 Delivering Homes, which sets out the headline levels of gypsy and traveller pitch and travelling showpeople plot delivery across the district.
- 3.3 National policy, as set out at 2.7 above, requires the Council to maintain an up-to-date understanding of the needs of traveller accommodation needs within our area, to set pitch and plot targets to meet these needs, and to identify a supply of deliverable sites to meet these locally set targets.
- 3.4 During the process of the preparation of the Local Plan, the national policy set out within the Planning Policy for Traveller Sites was updated, however, the requirement to identify local needs and provide a supply of sites to meet those needs did not change. The revised Planning Policy for Traveller Sites (2015) however amended the planning definition of a traveller and travelling showperson, which in turn led to a decrease in the assessed needs. As a result, the strategy for meeting needs was revised, particularly after also taking stock of the impact of recent planning permissions on the revised needs figures.
- 3.5 The provisions of the Equalities Act (2010)² have also been taken into account in the formulation of our strategy toward traveller accommodation. Under the Act, travellers (including those who no longer meet the planning definition) may have a right to culturally appropriate accommodation.
- 3.6 Our strategy has been further informed based on the geographic distribution of our existing gypsy and traveller sites, with specific consideration given to a concentration across an area in the north of the district around the hamlet of Marsh where, if taken cumulatively, the number of traveller pitches is approximately equal to the number of permanent dwellings in the area.

² See paragraph 2.5 above.

- 3.7 Consideration has also been given to ensuring that there is no net loss in traveller sites, in order to continue to meet our current accommodation needs. This is particularly critical for sites located near to areas of strategic development, where there might be pressure for existing sites to be redeveloped.
- 3.8 With regards to Green Belt, our strategy was informed by statements within national policy on the importance of preserving the openness of the Green Belt, versus the need to provide a supply of pitches and plots. The revision to the definition and the resulting changes to our needs figures mentioned in paragraph 3.4 above influenced this consideration and the resulting strategic approach.

The resulting strategy

- 3.9 The Council has taken stock of all of these considerations, in order to develop a strategy for meeting the future accommodation needs for all sections of the traveller community in Wycombe District. In short, the key issues can be summarised as:
- **Meet the District's pitch requirements for those meeting the planning definition of a traveller in full, and consider anyone whose travelling status is unknown as meeting the definition in order to ensure that we fully meet our obligations;**
 - **Safeguard existing sites to ensure that existing needs continue to be met;**
 - **Set out broad locations for growth to cater for arising requirements throughout the duration of the plan, focusing on those areas outside of the Green Belt, and outside the locality of Marsh;**
 - **Set out a criteria-based policy for assessing planning applications.**
- 3.10 These considerations should form the basis of a consistent, transparent set of criteria for assessing site options for additional pitch provision for both travellers and travellers who have ceased to travel but wish to claim culturally appropriate accommodation under the Equalities Act (2010).

4.0 Evidence

What has been taken into account?

4.1 In developing a strategy for meeting the needs of Gypsies, Travellers, and Travelling Showpeople, we have taken a number of issues and pieces of evidence into account. These include:

- The requirements for additional pitches and plots set out in the most up-to-date Gypsy and Traveller Accommodation Needs Assessment (GTAA) (Bucks Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Final Report, February 2017; this report has a base date of February 2016);
- Planning permissions granted since the base date of the 2017 GTAA;
- The recommendations of other relevant studies including the Bucks GTAA (original version 2013, as well as the 2014 update and 2017 final report), and the Gypsy, Traveller and Travelling Showpeople Sites Study carried out for the Council by Baker Associates in 2010;
- An overview of the existing geographical pattern of traveller site provision in the District as well as local policies and issues which are relevant to the process of planning for future provision.

4.2 The GTAA 2017 has made a series of recommendations, in light of the new government position set out in the PPTS (2015). These recommendations included:

- Only considering households who meet the planning definition when identifying need;
- To meet this arising need through the intensification / expansion of sites, or to consider allocating sites, including pitches on public sites;
- To give careful consideration of how to meet the needs of those whose travelling status is unknown;

- To employ a criteria-based approach to meeting this element of the need, if it is later demonstrated these travellers do, in fact, meet the planning definition;
- To address the needs of those who do not meet the planning definition through other means such as the Housing and Economic Development Needs Assessment (HEDNA);
- To be mindful that there may be Romany, Irish, or Scottish Travellers who no longer travel, but who may wish to exercise a right to culturally suitable housing under the Equality Act (2010);
- To monitor the levels of unauthorised encampments as the changes associated with the PPTS (2015) develop, and consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments.

4.3 We have considered how to best accommodate those whose travelling status is unknown. We have concluded that we should deliver a substantial portion of the need for those whose status is not known; to not do so was felt to increase the risk of unauthorised intensification of sites or doubling up of caravans.

4.4 The original Bucks GTAA, published in 2013, provided a series of recommendations on how to develop a strategy for provision of traveller sites, which informed the approach in earlier drafts of our Local Plan. These included:

- Safeguard existing permanent traveller sites, to ensure that needs continue to be met;
- Identify broad geographical locations in local plans specifying that the identification of further sites should focus on these locations where appropriate;
- Allocate private sites in suitable locations through the Local Plan;
- Explore opportunities to develop any new public sites within the most sustainable locations;

- Investigate instances where non-Gypsies and travellers are occupying existing pitches, and make these pitches available to the travelling community where possible;
- Investigate the potential from existing sites to achieve additional pitches/plots;
- Identify a reserve supply of sites, beyond the minimum requirement, which could be brought forward in the future if required;
- The development of suitable criteria-based policies for planning applications;
- Supporting planning applications on the most appropriate sites, where these criteria have been met;
- Noting that Romany Gypsies and Irish Travellers have separate traditions and may not be prepared to share sites. Similarly, travelling showpeople are unlikely to share sites with gypsies or travellers.

4.5 Prior to this, the Council had commissioned Baker Associates to carry out a study of potential sites for travellers in the District in 2009. The study, published in 2010, produced a shortlist of sites and also produced recommendations on approaches to site delivery, including:

- Identification of suitable small sites for an individual family pitch (possibly with space for future expansion to meet the needs of younger family members) which can be purchased on the open market;
- Identification of medium sized sites (small 1-5, medium 6-12 pitches) which can be purchased on the open market;
- Provision of pitches as part of the allocation of large strategic housing sites, put forward as part of the development of mixed and balanced communities. Developers would be required to provide land for pitches which could be provided on an open market (privately owned and managed) and/or affordable (publicly owned and managed) basis. The report recognised, however, that this had not been raised in consultations

and that its impact on achievement of affordable housing and other community benefits on these sites would need to be assessed.

- Identification of medium-sized sites which could be publicly owned and managed (by BCC, an RSL or possibly WDC) for the provision of affordable pitches. The report recommended that this approach should be investigated further.
- Identification of the potential for purchase/use of vans on mobile home parks to meet affordable needs. The report, however, recognised that this approach had many potential pitfalls due to the impact on existing residential amenity. It recommended that whilst the approach should be investigated further, it was unlikely to be appropriate in Wycombe District.
- Examine the potential to accommodate additional pitches on existing sites. The study noted that this was particularly relevant for travelling families with older children looking for their own provision in close proximity to the family.

4.6 The study also advised that:

- The identification of additional pitch provision should take into account where the need arises;
- The Councils should be reasonably flexible about the location of small private sites;
- The Councils should investigate the potential from existing sites to achieve additional pitches/plots either through increasing the capacity within existing boundaries or through site extension onto adjoining land;
- The Councils should also undertake site assessment work to identify new sites to meet identified future gypsy and traveller needs.

Sustainability Appraisal

4.7 The Sustainability Appraisal of the Wycombe District Local Plan identified the need for more family or privately owned traveller sites as a key sustainability issue.

- 4.8 The Sustainability Appraisal concluded that the Local Plan's approach to providing housing, including gypsy & traveller accommodation, would result in a significant long term positive effect.

5.0 Consultation

Duty to Cooperate with the other Buckinghamshire local authorities and the Bucks GTAA

- 5.1 We have been working collaboratively with the other districts in Buckinghamshire³ in recent years in order to assess the accommodation requirements of the travelling community. The Bucks Districts commissioned consultants ORS to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) in 2012. The initial report was published in 2013, and an update was published in 2014 to take account of updated information.
- 5.2 Following the publication of the PPTS in August 2015, which included a revised definition for travellers and travelling showpeople, a new GTAA was commissioned in 2015, finalised in May 2017, and formally published in September 2017⁴. This updated study provides a current assessment of need for gypsies, travellers, and travelling showpeople in light of the updated national policy position.
- 5.3 This joint working has given each Bucks authority a consistent evidence base and a common assessment of our total needs for gypsy and traveller pitches and travelling showpeople plots.
- 5.4 In July 2017, a Bucks wide memorandum of understanding was signed by the respective Cabinet members for Planning of Aylesbury Vale, Chiltern, South Bucks, and Wycombe District Councils, as well as the chairperson of the Bucks and Thames Valley Local Enterprise Partnership. Article 2.4 of the memorandum of understanding agreed two points:
- That the signatory authorities agree with the assessment of the need for gypsy and traveller accommodation set out in the GTAA 2017.

³ Aylesbury Vale, Chiltern and South Bucks District Councils.

⁴ Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (May 2017, Opinion Research Services)

- That no authority in Bucks is asking another Bucks authority to meet any of their gypsy, traveller, or travelling showpeople needs.

Duty to Cooperate with authorities outside of Buckinghamshire

- 5.5 As a part of the ongoing duty to cooperate work we have periodically invited comments from other local authorities beyond our housing market area. This has taken place both as a part of the process of formulating our GTAAs, and also more broadly at each stage of plan preparation where their views were sought on our draft policies.
- 5.6 In many instances these authorities had no issues to raise, but requested to be kept informed.

Responses to public consultations

- 5.7 As we have developed our Local Plan, we have periodically invited comments on our draft policies. The broad themes of the responses at each stage are set out below; they are presented in more detail in the statement of consultation.
- 5.8 **Winter 2012 consultation** – at this stage we invited comments on what the main issues to be addressed in a new Local Plan for the Wycombe District were. The main response received in respect of gypsy and traveller accommodation stated that the new Local Plan needed to take account of the findings of the current needs assessment.
- 5.9 **Community conversations, 2013** – continuing from the exploration of issues begun in Winter 2012, there was general agreement that more sites should be provided, but it was also acknowledged that in some areas there were restrictions that limited what could be provided.
- 5.10 **Local Plan options consultation, 2014** – four questions were asked as a part of this consultation, asking about the form that the overall approach should take, whether existing sites should be safeguarded, how the assessed need should be delivered, and inviting site suggestions.
- Setting a target for pitches was supported, as was the idea of providing a pitch supply beyond the 10 year period (2023).

- The suggestion of a criteria based approach attracted mixed opinions around how tightly the criteria might be drawn. There was support for the fairness and transparency that this approach might bring, while opponents suggested that all sites should be allocated.
- Safeguarding sites was largely positively received, but a minority suggested that inappropriately located sites should not be safeguarded.
- There was support for three of the four growth options (intensification, new allocations, and the conversion of temporary permissions to permanent ones), with the fourth option (allocating land on strategic allocations) attracting minimal response.
- Very few sites were suggested as a result of this consultation, but those that came forward included High Barns, Cadmore End; Dry Banks, Stokenchurch; and former Bucks County Council land holdings.
- A number of responses objected to any kind of provision being made for travellers.

5.11 Draft Princes Risborough Town Plan and Draft Wycombe District Local Plan, 2016 – the draft Princes Risborough Town Plan and the draft Local Plan set out an area specific strategy (in the case of the former) and two options for meeting our assessed needs, in conjunction with a criteria based approach (in the case of the latter). A number of responses were received, primarily to the proposed site allocations to meet our assessed needs set out in the draft Local Plan.

- A small number of responses stated that changes to legislation eliminated the need to provide for gypsies and travellers.
- Specific objections were received to proposed site allocations at High Heavens, Booker; and Old Horns Lane, Booker. In these cases, the landowners expressed their opposition to the land being allocated for traveller accommodation.

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- Specific comments were made concerning any further site allocations in the area of Marsh, to the north of the district, on the grounds of the settled community being dominated by traveller pitches. Draft policy DM27 included a criterion for no further development in the vicinity, which was supported.
- Generally, respondents were keen to see no harm done to areas such as the Green Belt, and AONB. There was also a suggestion that no site should be allocated in a zone of high flood risk.

6.0 Assessing the Requirements (Key issues / challenges)

- 6.1 PPTS (2015) requires local authorities to set pitch targets for gypsies and travellers, and plot targets for travelling showpeople, who meet the planning definition set out in annex 1 of PPTS (2015). It requires a supply of specific deliverable sites to be identified to provide 5 years' worth of sites against local targets, and either specific developable sites or broad locations for growth for years 6-10 of a plan period and, where possible, for years 11-15.
- 6.2 Furthermore, PPTS (2015) requires that criteria should be set to guide land supply allocations where there is identified need, and where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications do come forward. These same criteria would also form the basis for decision-making that exceeds identified needs, such as inward migration or additional new household formation above that anticipated by the GTAA (2017)⁵.

Differentiating between travelling and non-travelling households

- 6.3 As noted, annex 1 of PPTS (2015) included revised planning definitions for gypsies, travellers, and travelling showpeople, which narrows the definition by excluding those who have permanently ceased to travel. This complicates the consideration of pitch and plot needs by introducing a division between those who meet the definition, those who do not through permanently ceasing to travel, and those whose status in terms of the planning definition is unknown.
- 6.4 Reflecting the change to the planning definition of a traveller, the most recent GTAA (2017) presents the projected need for gypsies, travellers, and travelling showpeople in three categories: those meeting the planning definition, those who have ceased to travel and therefore do not meet the definition, and those whose status is unknown.

⁵ Buckinghamshire Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (May 2017, Opinion Research Services)

- 6.5 The GTAA (2017) identifies no need arising within the Wycombe district for gypsies or travellers who meet the current planning definition. It identifies a need of one plot for travelling showpeople who meet the planning definition.
- 6.6 The GTAA (2017) identifies a need for seven pitches for gypsies or travellers whose travelling status is unknown. It identifies a need for two further plots for travelling showpeople whose status is unknown.
- 6.7 ORS suggests, based on their experience of conducting GTAAs across England, that the proportion of those travellers recorded as status unknown who meet the planning definition could be around 10%⁶. Following this suggestion would result in needing to deliver one additional pitch for gypsies and travellers, and one additional plot for travelling showpeople, over the lifetime of the Local Plan, in addition to the need for those travellers and travelling showpeople confirmed to be meeting the current planning definition.
- 6.8 Having given consideration to ORS' suggestions, we believe that the proportion of those travellers whose status was recorded as unknown, who in reality meet the planning definition, could exceed 10%. A more robust approach would be to assume that the majority of travellers of unknown status are travelling.
- 6.9 Therefore, we have decided to adopt a cautious approach to Wycombe's needs and assume that any traveller whose status is recorded as unknown in the GTAA (2017) is a traveller, meeting the current planning definition.
- 6.10 We have noted evidence of emerging practice where policies cater only for the accommodation needs of those households defined as 'travelling'. In some of these emerging plans, the accommodation needs of those households defined as 'non-travelling' are provided through the conventional housing requirement. This has been described by a local plan inspector (for the Swales Local Plan in Kent) as a "pragmatic" approach and was supported by that Inspector.
- 6.11 Similarly, the interim findings of the inspector examining the Gloucester, Cheltenham and Tewkesbury Core Strategy accepted the approach of discounting the requirement from non-travelling households in setting out the

⁶ Increasing to 70% for travelling showpeople

traveller pitch requirement. The inspector stated: “The accommodation needs of those people who are no longer classified as Gypsies, Travellers and Travelling Showpeople should be considered as part of the overall housing requirements addressed within the SHMA.”

- 6.12 It is acknowledged that this is an emerging area of work, and it is expected that future revisions to the NPPF may supersede the PPTS or provide additional clarity.
- 6.13 The GTAA (2017) suggests we could discount the non-travelling element of pitch requirements from our overall needs; however the provisions of the Housing and Planning Act (2016) and the Equalities Act (2010) (specifically that non-travelling travellers may be able to demonstrate a right to culturally appropriate accommodation) also need to be considered.
- 6.14 **We have taken the decision to not include the needs of non-travelling travellers within the assessment of pitch requirements for the Wycombe district. We recognise that the cultural traditions of those who have ceased to travel should be respected, in line with their right to culturally appropriate housing under the Equalities Act (2010). Should any non-travelling traveller wish to claim culturally appropriate housing then it would be weighed under the same criteria based approach set out in policy DM26 of the Local Plan. Otherwise the accommodation needs of this part of the community would be picked up as a part of the wider need for conventional housing as set out in the strategic policy for delivering homes (CP4).**
- 6.15 Furthermore, we are investigating the possibility of providing park homes on Council-promoted sites within the Local Plan, and this could provide culturally appropriate accommodation for non-travelling travellers.

Requirements

- 6.16 The required level of pitch provision is set out in table 1 below. This is derived from GTAA (2017), having then applied the considerations set out at 6.10 and 6.14 above.

6.17 National policy recommends that a proportionate amount of additional pitches or plots are also included in needs assessments for a buffer, to act as a contingency against any unexpected needs that should arise. Our approach to travellers and travelling showpeople whose status is unknown (assuming that they all meet the planning definition) also meets this recommendation, as we are potentially providing a greater supply of pitches and plots than we are required to by the PPTS (2015).

6.18 We have re-interpreted the phasing figures set out in the GTAA (2017) so that the first period allows for 5 years of requirement from adoption of the Plan (anticipated in 2019) resulting in a longer phasing period to 2016-23, followed by two further five year periods running from 2023-28 and from 2028-2033.

Table 1 Traveller pitch requirements in Wycombe District (from GTAA, 2017)

Travellers	No. pitches 2016-23	No. pitches 2023-28	No. pitches 2029-33	Total
Travelling (or status unknown)	3	2	2	7
Travelling Showpeople	1	0	2	3

Geographical geographically-specific issues in Wycombe District

6.19 In Wycombe, there are a number of geographically-specific issues which also need to be taken into account in the formulation of a strategy for future traveller accommodation.

(i) Marsh area

6.20 A cluster of traveller sites has developed over recent years in the area surrounding the hamlet of Marsh, in the northern-most portion of the District. These are small and medium-sized sites which, taken individually, do not impact on the proportion of travellers and non-travellers in the area. However, taken cumulatively, the numbers of pitches present in this area mean that there are now an approximately equal number of permanent dwellings and traveller

pitches across a roughly 3 sq km area. See district-wide map of sites in Appendix A, and an area map illustrating the concentration of sites relative to Marsh in Appendix B.

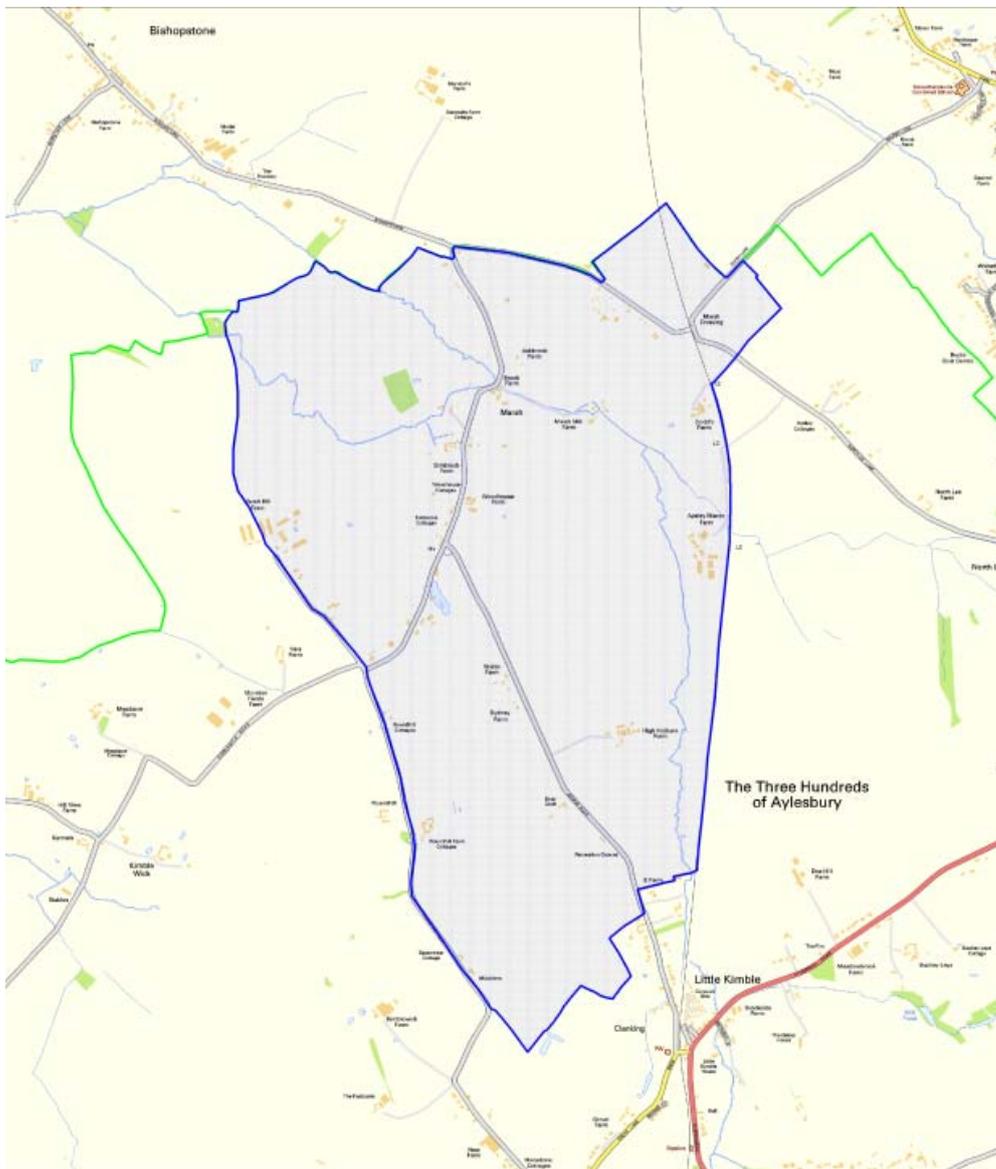
- 6.21 In formulating the strategy, WDC notes government policy that “when assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community” (PPTS, 2015, para 14) and “Local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan. Local planning authorities should ensure that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing an undue pressure on the local infrastructure” (PPTS, 2015, para 25). We also note the general principles of not placing local infrastructure and services under undue pressure (PPTS, 2015, para 13f) and relating “the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density” (PPTS, 2015, para 10d).
- 6.22 The particular context of Marsh is that the settled community is dispersed in a linear and scattered settlement, rather than a nucleated one with a central core. Marsh can therefore be said to have a low density. The traveller sites in this area sit in various directions from the hamlet with a particular cluster to the north-west at Marsh Lane, a short distance from the settlement (see appendix B).
- 6.23 PPTS (2015) deems that traveller sites are inappropriate development for Green Belt areas. One of the advantages in planning terms for traveller sites in Marsh is that this area lies beyond the Green Belt.
- 6.24 It is also noted that the sites in the Marsh area consist of various families who have gradually intensified and/or expanded their respective sites. Nevertheless, given the context of the relative population size of the settled/traveller community, the geographical location of the settlements, and the low density of the surrounding settled population, it is considered that any additional traveller accommodation in this area would be disproportionate to the settled

community, and would therefore be contrary to government policy. **It is therefore considered that the strategy should exclude this approximately 3 sq km area, as defined in figure 1, from the broad locations for growth.**

6.25 Existing commitments in this area would not be affected by this restriction, and would be considered against existing policies.

6.26 It is proposed to assess the ongoing effectiveness of this approach during future reviews of the Local Plan, with specific consideration given to how the position may change over the lifetime of the Local Plan due to pitches or sites being vacated, and possible future changes in national policy.

Figure 1 Marsh Area



(ii) Princes Risborough / Longwick area

- 6.27 There are two traveller sites – the Twin Oaks traveller site (which is split into two separate family-owned sites), and the Pettigrove travelling showpeople site – which are located on Lower Icknield Way, between Princes Risborough and Longwick. Whilst these are long-established sites, it is necessary to recognise the fact that they now fall within the area proposed to be designated as the Princes Risborough Expansion Area in the emerging Wycombe District Local Plan, in which policy PR3 proposes a major residential-led mixed use expansion of the town.
- 6.28 The Princes Risborough Concept Plan contained within the Wycombe District Local Plan indicates that the area in which the traveller sites are located would be part of a wider area proposed as a green buffer between Princes Risborough and Longwick, and as providing open space to support the town expansion.
- 6.29 **There is no requirement for the traveller sites within this area to be relocated.** However, should those with interest wish to do so, there is potential for relocation, subject to the availability of suitable alternative sites, which would then consequently facilitate furthering the ambition of green infrastructure networks in the expansion area.
- 6.30 As noted in the Bucks GTAA (2013), it is desirable that there is no net loss in traveller sites at any location within the district. This consideration is extended to strategic allocations, including in the expansion area.
- 6.31 **With these points in mind**, it is considered that the strategy should allow for the possibility of the development of gypsy, traveller and travelling showpeople accommodation outside the expansion area, for the relocation of the existing sites within the expansion area, so long as the sites proposed meet with other applicable national and local policies regarding such provision. **This is not a requirement of the planned expansion of Princes Risborough, therefore no formal allocation is made to this end. It is anticipated that should those with an interest wish to pursue this avenue, the potential relocation sites will be brought forward through the planning system and be**

weighed against the other requirements of this strategy and other relevant local and national policy.

(iii) Green Belt

- 6.32 Government policy states that traveller sites (temporary or permanent) in the Green Belt are inappropriate development (PPTS 2015 para 16), which by definition is harmful to the Green Belt and should not be approved, except in very special circumstances. PPTS (2015) states that Green Belt boundaries should be altered only in exceptional circumstances. It states that if a LPA wishes to make an exceptional, limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site, it should do so only through the plan-making process and not in response to a planning application. If land is removed from the Green Belt in this way, national policy says it should be specifically allocated in the development plan as a traveller site only.
- 6.33 Furthermore, PPTS (2015) paragraph 16 states that the personal circumstances of any potential occupants and unmet needs are unlikely to demonstrate exceptional circumstances enough to outweigh any possible harm that might be caused through Green Belt release to accommodate a traveller site.
- 6.34 In the case of Wycombe District, a large part of the District – almost half of the land area – is designated as Green Belt, which therefore limits the pool of land outside of this which would be considered appropriate in government policy terms. This pool of land is further limited when the restrictions in specific geographical locations outlined above, are taken into account.
- 6.35 WDC is committed to protecting the Green Belt, and believes that it has helped shape our towns and villages and played a vital role in preventing urban sprawl, ensuring towns and villages do not merge into one another and helped prevent development encroaching into the countryside. There are a small number of existing traveller sites in the Green Belt, where further requirements are likely to arise from household formation, and there are also other sites in the Green Belt which are either the subject of interest from travellers from previous planning

applications or which are proposed for potentially being removed from the Green Belt through the local plan for other uses, and which could also be assessed for their suitability as traveller sites.

6.36 Our locally assessed needs for gypsies and travellers through the first ten years of the plan period are being met through specific pitches from recent permissions, as set out in the following section, and our needs for travelling showpeople could be met through the intensification of the existing sites where the needs may arise. On this basis, **we do not consider that there is justification for changes to the boundary of the Green Belt.**

6.37 Future applications for gypsy and traveller sites, and travelling showpeople yards, will be considered against the criteria set out in policy DM26; as there are no exceptional circumstances demonstrated new sites within the Green Belt would be inappropriate. This is in order to provide certainty regarding the permanence of the Green Belt, in line with government policy⁷.

⁷ Planning Policy for Traveller Sites (2015) Policy E: Traveller sites in Green Belt

7.0 Meeting the requirement

7.1 This section takes forward the strategy for travellers and the requirement for additional pitch provision outlined in the previous sections, and sets out how we intend to meet the accommodation requirements of travellers. This considers the following sources:

(A) Vacant/available pitches, commitments and current applications

7.2 These are pitches which can be counted already against requirements. This source includes:

- Recent permissions, planning applications already submitted where these are for suitable sites and sources of supply from vacant pitches;
- Additional provision through the take-up of vacant pitches on permitted sites including, where appropriate, extra provision on such sites to accommodate requirements arising from household formation.

(B) Potential additional pitch provision at existing sites

7.3 This source includes additional pitches at existing sites through:

- Site intensification (more pitches on the same area)
- Site expansion (allowing the site to expand)
- Converting temporary permissions to permanent permissions

(C) New sites

7.4 The search for potential additional pitch provision at new sites focused on a site list drawn up from following sources:

- Previous planning applications
- Sites assessed in the Baker Associates study, including those which were shortlisted in the Council's Interim Policy Statement 2010

- The Call for Sites which was carried out as part of the Local Plan Options Consultation 2014
- Further sites which have come forward as a result of the draft Local Plan consultation in summer 2016.
- Other potential sites which are proposed for other uses in the local plan, where these could potentially be suitable for traveller accommodation provision, including sites proposed to be removed from the Green Belt.

Broad Locations for Growth

7.5 As stated above, we consider that it is appropriate to identify broad locations for growth for the latter part of the plan period. This will cater for the requirements arising after the first ten years of the plan.

Summary of potential delivery and site options to meet the requirement

(A) Vacant/available pitches, commitments and current applications

7.6 Table 2 below provides a summary of recently granted planning permissions.

7.7 At the time of writing, there are no planning applications under consideration on sites that are considered to be suitable.

7.8 At the time of writing, there are no vacant pitches where it would be appropriate to accommodate our requirements.

Table 2 Summary of recently granted planning permissions

<i>Site Source of site and other comments</i>	<i>Additional pitch nos</i>
Charlotte's Farm, Marsh Lane Application permitted (15/06133/FUL)	2
The Willows, Marsh Application permitted (16/05268/FUL)	2
Total	4

(B) Potential additional pitch provision at existing sites

7.9 Table 3 below provides a summary of where additional pitches may be, or have been, provided on existing sites through intensification or expansion of the site, or the conversion of temporary permissions to permanent permissions.

Table 3 Summary of potential additional pitch provision at existing sites

<i>Site Source of site and other comments</i>	<i>Additional pitch nos</i>
Field Farm, Spurlands End Road, Great Kingshill Application permitted for the conversion of existing temporary permission to permanent (see planning app ref 12/06652/FUL).	1
The Nursery, Flackwell Heath Application for site intensification permitted (15/06045/VCDN).	1
Pendles Paddock, Stokenchurch Potential opportunity for intensification of site to provide one additional travelling showpeople plot to accommodate a doubled-up household.	1
Pettigrove, Longwick Potential opportunity for intensification of travelling showpeople yard to accommodate new household formations.	1-2
<i>Total</i>	5

(C) New sites

7.10 The 2014 Options Consultation led to two sites being suggested for possible gypsy and traveller accommodation. These were High Barns, Cadmore End, and Dry Banks, Stokenchurch.

7.11 The 2016 draft Local Plan consultation included a shortlist of possible site allocations to meet our future needs. These options included the potential for the intensification of existing sites, and four new sites:

- High Barns, Cadmore End
- Dry Banks, Stokenchurch
- Part of land adjoining High Heavens, Booker
- Land adjacent Old Horns Lane, Booker

7.12 Table 4 below summarises the outcomes of the consultation in 2016 and of further investigation which has led to these sites being discounted as site allocations.

Table 4 Sites considered for potential traveller site allocations in 2016 draft Local Plan consultation, and reasons for not being taken forward

<i>Site</i>	<i>Reason for being discounted</i>
Land adjoining High Heavens, Booker	Representation received from landowner as a part of the 2016 draft Local Plan consultation indicating that they were unwilling to allow this use for their land.
Part of land adjoining High Heavens, Booker	Representation received from the corporate landlord of High Heavens indicating that a site adjoining the strategic waste complex would not be supported. The same site area is being taken forward in the Local Plan separately for yard-based light industrial uses ⁸ , which there is an identified shortage of in the district ⁹ .
High Barns, Cadmore End	Site is located in the Green Belt, and has an active planning permission granted in April 2016 for equestrian uses. Government guidance in PPTS (2015) states that

⁸ Policy HW16 of the Wycombe District Local Plan, publication version, October 2017

⁹ Wycombe District Council Economy Study & Employment Land Review, January 2014, draft report, Roger Tym & Partners

	<p>exceptional circumstances must be demonstrated in order to remove land from the Green Belt for use as a traveller site, and that unmet need on its own is unlikely to constitute exceptional circumstances.</p> <p>Additionally, motorway noise is a potential concern which would need to be properly assessed and mitigated against before development on the site could come forward.</p>
<p>Dry Banks, Stokenchurch</p>	<p>The landowner for this site did not respond to the 2016 draft Local Plan consultation. Indication has previously been given through discussions with the development management service that they may not be willing to let part of their site come forward for traveller uses.</p>

7.13 The 2016 draft Local Plan consultation did not result in any sites being promoted for possible Gypsy & Traveller accommodation.

7.14 A recent unauthorised site has come forward in the countryside between the villages of Askett and Meadle, to the north-east of Princes Risborough. This site arose after the completion of survey work that informed the GTAA (2017), therefore is not currently recorded as part of our need. It is currently subject to two planning applications. These applications are being assessed on their merits against extant policy. The site's suitability, and consequently, any need that might arise, will be subject to a decision through the development management process.

Summary

7.15 The assessment of needs in the Bucks GTAA (2017) as set out in table 1 above consisted of the following elements of need:

- a) 1 traveller household on a site with temporary planning permission (Field Farm, Great Kingshill)
- b) 6 new traveller household formations expected across the duration of the plan period

- c) 1 concealed / doubled up travelling showperson site (Pendles Paddock, Stokenchurch)
- d) 2 new travelling showperson household formations expected across the the plan period.

7.16 Permission has been granted since the base date of the GTAA (2017) for permanent planning permission for the household on Field Farm, Great Kingshill. This fully resolves the identified element of need a).

7.17 Permission has also been granted, as set out in table 2 above, for 4 additional pitches for travellers. This addresses some of the need set out in b) above.

7.18 Since the base date of the GTAA (2017) permission was granted for the intensification of The Nursery, Flackwell Heath, in order to add a third pitch to accommodate a concealed / doubled-up household.

7.19 No additional permissions have been granted since the base date of the GTAA for additional travelling showpeople plots, therefore elements c) and d) above remain outstanding in full.

7.20 Taking the recent permissions noted above into account, our modified need for traveller pitches and travelling showpeople plots is set out in table 5 below:

Table 5 Assessed need for gypsy and traveller pitches and travelling showpeople plots, modified to take account of new permissions since February 2016 base date of study¹⁰

Travellers	No. pitches 2016-23	No. pitches 2023-28	No. pitches 2029-33	Total
Travelling (or status unknown)	0	0	2	2
Travelling Showpeople	1	0	2	3

¹⁰ Buckinghamshire Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (May 2017, Opinion Research Services)

- 7.21 This need cautiously assumes that all seven of the travellers and both the travelling showpeople whose status is unknown in terms of the planning definition meet the definition. Our consultants ORS advised in the GTAA (2017) that the proportion of these who would meet the official definition would be 10%¹¹; the reality is likely to lie between the two figures. This means that we expect to meet the need for all who meet the planning definition in line with paragraph 10 of PPTS (2015), and any future need that arises will be assessed against the criteria set out in policy DM26.
- 7.22 With respect of the need for additional plots for travelling showpeople, the need set out in table 5 arises from new household formations at existing travelling showpeople yards (one at Pendles Paddock, Stokenchurch, and two at Pettigrove, Longwick). These needs could be best accommodated through the intensification of these sites. Applications for intensification would be assessed in accordance with the applicable local and national policies.
- 7.23 It is worth noting that the assessment of needs set out in the Bucks GTAA (2017) does not account for inward migration. Consideration was given to the possibility of allocating a site to accommodate need that may arise in this way; however due to the unpredictable nature of movements and desired areas of residence, and a lack of suitable sites being proposed by private operators, it has been decided to not proceed with such an allocation, and instead to weigh proposals against the proposed local criteria based policy as they arise.

Transit Accommodation

- 7.24 The original 2013 GTAA recognised that there is little evidence that there are any major regular or established travelling routes in Buckinghamshire or any information indicating a need for transit accommodation to be provided for anyone travelling through the area.
- 7.25 The 2017 GTAA notes that there is a possibility of increased travelling as a result of the changes brought forward in the PPTS (2015). However, the earlier

¹¹ 70% in terms of traveling showpeople.

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assessment is supported and ORS recommends no new transit accommodation is needed at the time of writing.

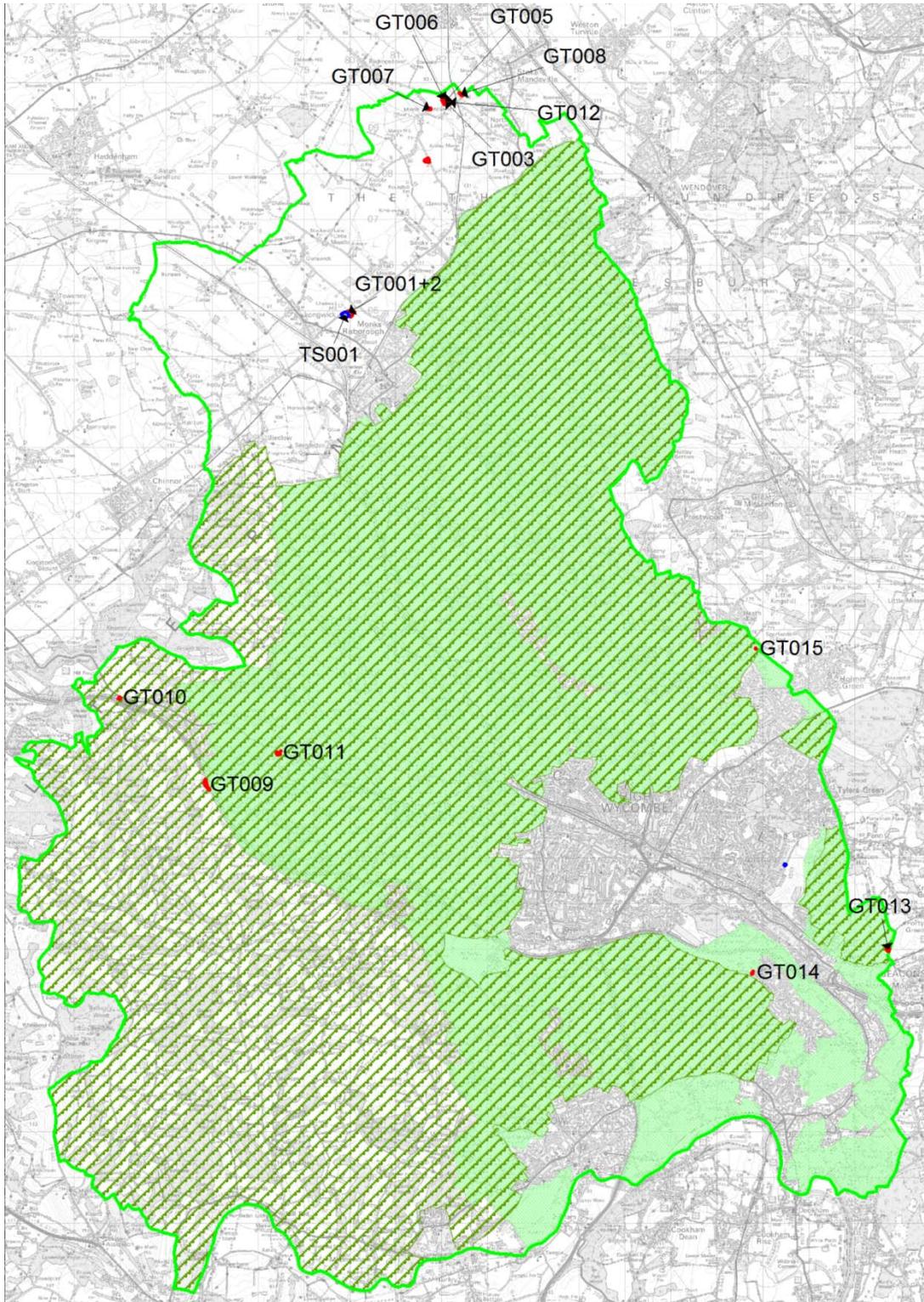
8.0 Conclusions

8.1 Based on the latest requirements identified by ORS in the updated Bucks GTAA (2017) and the assessment of site options, the overall conclusions can be drawn:

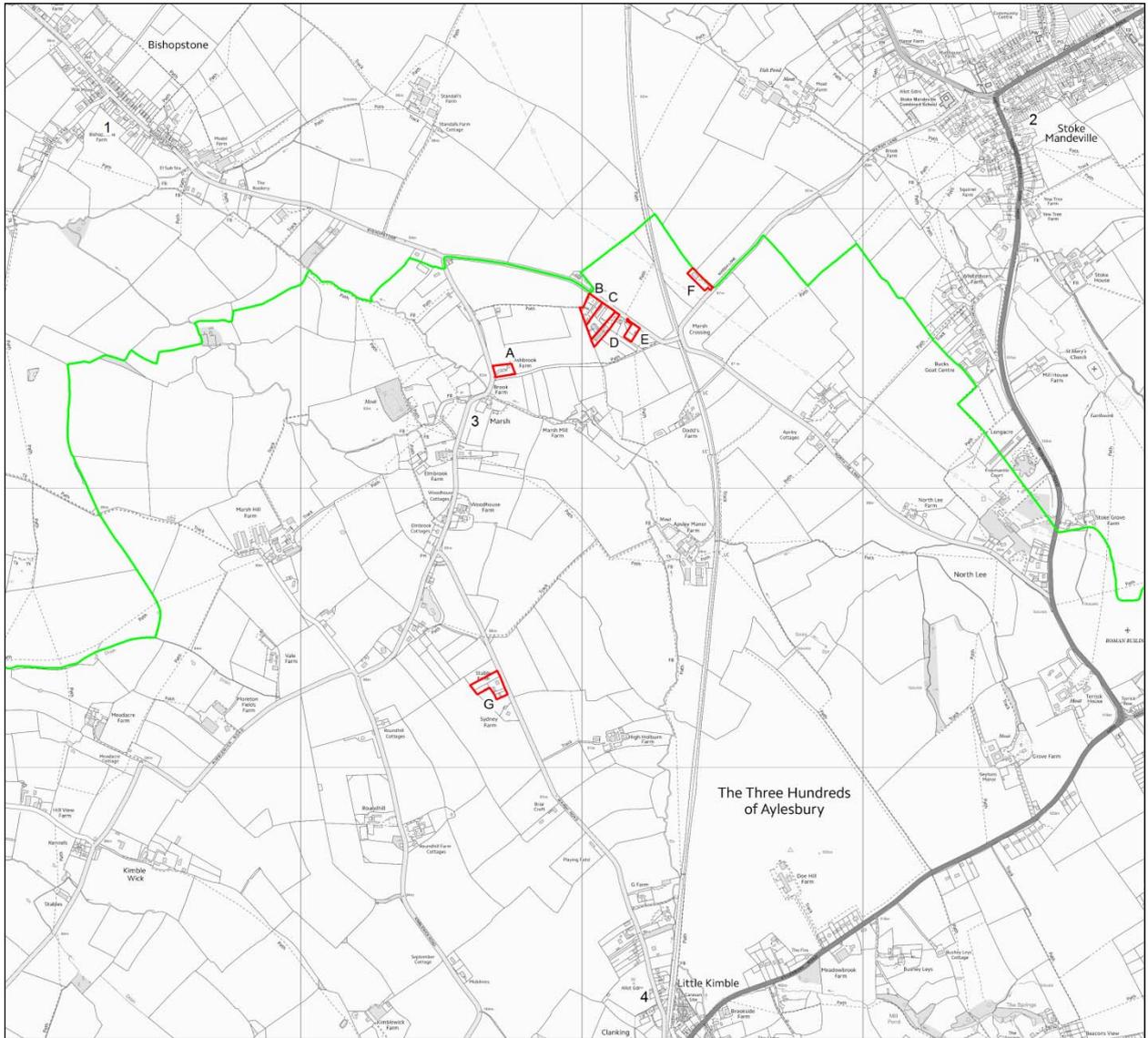
- That through our cautious approach that presumes any traveller whose status was assessed as unknown in the GTAA (2017) meets the planning definition of a traveller, we have made sufficient provision for travellers who meet the current definition in line with the requirements of paragraph 10 of PPTS (2015).
- That the need resulting from this approach has been met through recent planning permissions for the expansion and intensification of existing sites.
- That while balancing recent permissions against the assessed needs presents a remainder to two further pitches for delivery in years 11-15 of the plan period, this need is derived from the need identified for those who may or may not meet the planning definition. As noted at paragraph 7.21, it is unlikely that 100% of this “status unknown” need will actually meet the planning definition. Therefore it is not necessary to make allocations, when also considering a lack of willing landowners for sites previously assessed,
- That pitch requirements for travellers beyond the level of need assessed in the GTAA (2017) be addressed through a criteria-based approach.
- That the needs of travelling showpeople be addressed through the intensification of existing sites, as the need arises through household formations.
- That the requirements for travellers who no longer travel and wish to claim culturally appropriate accommodation in line with the Equalities Act 2010 be met through the application of the criteria-based approach.

9.0 Appendices

Appendix A: District-wide map of traveller sites (plan shows existing traveller sites in the district)



Appendix B: Traveller sites in the locality of Marsh



Sites:

Reference	Site	Number of pitches
A	Ashbrook Farm, Marsh	6
B	Oak Tree Farm, Marsh	4
C	Springfield Farm, Marsh	6
D	Lowlands, Marsh	3
E	The Willows, Marsh	4
F	Charlottes Farm, Bishopstone	4
G	Stables Farm, Kimble	5
	Total	32

Settlements:

Reference	Settlement
1	Bishopstone
2	Stoke Mandeville
3	Marsh
4	Little Kimble