

# Gypsy and Traveller Five Year Land Supply Statement

1 April 2023 - 31 March 2028

**June 2023** 





## 1 Introduction

- 1.1 The Planning Policy for Traveller Sites (PPTS) 2015, in conjunction with the National Planning Policy Framework (NPPF) 2021, requires local planning authorities to identify and annually update specific deliverable sites suitable for Gypsies and Travellers and Travelling Showpeople. As there are no Travelling Showmen sites in Gravesham, this Statement focuses solely on the accommodation needs of Gypsies and Travellers who were living in the Borough at the time of the Gypsy and Traveller Accommodation Assessment (GTAA).
- 1.2 The need for new Gypsy and Traveller pitches in the borough is ascertained from the Gravesham GTAA (2018). This updates the 2013 GTAA which provided the basis for determining pitch requirements to be met through the adopted Gravesham Local Plan Core Strategy (2014).
- 1.3 This Statement provides a summary of the current level of need for new pitches and the 5-year supply position of deliverable Gypsy and Traveller sites within Gravesham for the period 1 April 2023 to 31 March 2028. It will be used to inform the consideration of planning applications for Gypsy and Traveller sites/pitches.

## 2 Need for Pitches

#### Identified need.

- 2.1 The updated current and future need for Gypsy and Traveller pitches over the remaining Local Plan Core Strategy plan period (2017 2028), is assessed and presented in the Gravesham GTAA (2018). The GTAA assesses the accommodation needs of Gypsies and Travellers who live in Gravesham and meet the planning definition as set out in Appendix 1 of the PPTS. While not a requirement, it also assesses the accommodation needs of those Gypsies and Travellers that do not meet the planning definition.
- 2.2 Table 1 shows the total pitch need over the current plan period 2017 2028 and the additional years that need to be considered to fully covering the timescales of the emerging Local Plan Review, 2028 2037.

Table 1 – Gypsy and Traveller pitch needs 2017 – 2028 and 2028 - 2037

	Total 2017 - 2028	Total 2028 - 2037
Households that meet the planning definition	24	7

Table 2 shows the total need figure over the current plan period (2028) and the emerging plan period (2037), broken down into 5 Year periods.

Table 2 - Gypsy and Traveller pitch needs 1 April 2017 – 31 March 2037

Period 1 April – 31 March	Pitch Need Met the Planning Definition
2017 - 22	19
2022 - 27	4
2028	1
2028 - 32	3
2032- 37	4
Total	31

- 2.4 Table 2 shows that there is the greatest need to deliver pitches in the first 5-year period, where between April 2017 and March 2022 there is a 5-year need for 19 pitches. This represents a need to deliver 3.8 pitches per year.
- 2.5 This Statement rolls forward the five-year period from April 2017 March 2022 to provide a picture of supply in 2023, and as such a proportion of the pitch need from the 5-year period, April 2022 March 2027 has been included.
- 2.6 Identified pitch need in the period April 2022 March 2027 is for 4 additional pitches; this represents the provision of 0.8 pitches per year. As pitches cannot be delivered in part, a single pitch has been added to the pitch need for the period April 2017 March 2022. There is therefore an identified need for 20 pitches over the period April 2017 March 2023.
  - Delivery of Pitches between April 2017 and March 2023
- 2.7 Table 3 shows that 10 additional pitches that have been granted planning permission over the 5-year period, April 2017 March 2022. Of these 5 pitches were on a new site (Heron Hill Lane, Meopham) and 5 pitches were on existing family sites. All permissions have been implemented.
- 2.8 There were no additional pitches delivered between April 2022 and March 2023

Table 3 – Number of pitches granted planning permission (April 2017 – March 2023)

Period (1 April 2017– 31 March 2023)	Site	No of pitches
4/2017 –3/2018		0
4/2018 –3/2019		0
4/2019 –3/2020	2019/00019/REF – Heron Hill Lane, Meopham	5
4/2020 –3/2021	20171128 - Millers Farm, Wrotham Road, Meopham 20180142 - Viewpoint, Rochester Road, Gravesend 20190823 - O'Dell Farm, Lower Higham Road, Chalk, Gravesend	1 1 3
4/2021 –3/2022		
Total (2017 – 2022)		10
4/2022 –3/2023		0
Total (2017 – 2023)		10

# Outstanding Need April 2017 – March 2022

- 2.9 As 10 pitches were delivered during the 5-year period April 2017 March 2022, there remains an outstanding need for 9 pitches against the identified need for 19 pitches for this period, which needs to be carried forward to the next 5-year period.
- 2.10 Given this Statement covers the period April 2017 March 2023, and that there were no pitches delivered last year (April 2022 March 2023) against a pitch need of 20 pitches for this extended period, the total undersupply would increase to 10 pitches over this 6-year period.

Table 4 - Summary of Need

	Number of Pitches
5-year need -April 2017 – March 2022	19
Permissions - April 2017 - March 2022	10
5- year total undersupply	9
6-year need to inform position from 1 April 2023 (April 2017 – March 2023)	20
Permissions – April 2017 – March 2023	10
Total undersupply to 31 March 2023	10

# 3 Deliverable Supply of Gypsy and Traveller Pitches

- 3.1 There are no sites with an extant unimplemented planning permission for additional Gypsy and Traveller pitches, as of March 2023.
- 3.2 As of March 2023, there is 1 pitch available on the Council's public site at Denton. There is also 1 pitch vacant on the Springvale site in Northfleet, but as this is a private site this cannot be considered to add to the available supply of sites.
- 3.3 There are no allocated sites in the Local Plan Core Strategy or the emerging Local Plan Core Strategy Partial Review and Site Allocations.

#### 4 Conclusion

- 4.1 From Table 4, it can be seen that there is an undersupply of 10 pitches against identified need for 20 pitches in the 6-year period April 2017 March 2023.
- 4.2 Looking forward, as shown in table 2, there is an identified need for 4 pitches in the 5 period, April 2022 March 2027 and 1 pitch for the 2028. As this statement has already taken account of the need for 1 pitch between April 2022 and March 2023, the remain pitch need for the next 5 years (April 2023 March 2028) reduces to 4 pitches.
- 4.3 Taking account of the undersupply from the previous 6-year period, the pitch need for the 5-year period April 2023 March 2028 increases to 14 pitches, reducing to 13 pitches taking account of the 1 vacant pitch at Denton.
- 4.4 As shown in the calculation below, based on the above information, as of 31 March 2023, there is a supply of 0.4 years:

Period of time x supply  $\div$  Need = years of supply  $5 \times 1 \div 13 = 0.38$  years of supply

- 4.5 The Council is aware that it cannot demonstrate that a 5-year supply of deliverable pitches in line with national planning policy requirements and is seeking to address this through its emerging Local Plan Core Strategy Partial Review and Site Allocations.
- 5 Addressing GTAA Need going forward.

# Adopted Local Plan Core Strategy – Policy CS17 Provision for Traveller Sites

- 5.1 Gravesham's adopted development strategy to meet the Borough's identified development needs is set out in Core Strategy Policy CSO2 and focuses on making the most efficient use of land by focussing new development in sustainable locations, such as previously developed land in the urban area predominantly along the Thames (defined as Opportunity Areas) and rural settlements inset from the Green Belt. Development outside rural settlements is supported provided it is in line with national planning policy.
- 5.2 In line with the adopted development strategy, Strategic Objective SO2 of the Core Strategy the seeks to provide sites for Travellers in sustainable locations, such as the urban area and rural settlements inset from the Green Belt. The strategic approach to site provision set out in Core Strategy Policy CS17 focusses on expanding existing sites in the urban area (i.e. Denton and Springvale) and supporting new sites in the urban area and rural settlements inset from the Green Belt. The Core Strategy does not allocate sites to meet identified Traveller.

#### The emerging Local Plan

5.3 The council is reviewing the Local Plan Core Strategy, preparing Site Allocations and a Development Management Policies Document. In the light of the Government's housing need methodology and the need to look forward over a 15-year period, options for how and where future growth to meet the development needs of an increased population have been explored through two Regulation 18 consultations, the Stage 1 consultation took place in April 2018 and the Stage 2 consultation in October 2020.

# Regulation 18 Stage 1 consultation

- The Regulation 18 stage 1 consultation looked at options for how and where future growth could be accommodated. It took account of the settlement hierarchy which categorised settlements according to their size and the range of services and facilities available and hence their sustainability and environmental constraints, while still remaining committed to the adopted strategic objectives of urban regeneration and focussing most development within the Opportunity Areas identified in the Local Plan Core Strategy.
- 5.5 A draft Strategic Housing Land Availability Assessment (SHLAA) supported this consultation. It set out how much deliverable and developable land was available to meet identified development needs and concluded that there was insufficient promoted land outside the Green Belt to meet these needs over the whole plan period.
- 5.6 In the absence of sufficient deliverable and developable land within the urban area and rural settlements inset from the Green Belt, the council stated that it was considering whether a case for exceptional circumstances could be made to justify the release of Green Belt land to

meet identified development needs, including the accommodation needs for Travellers. Alongside this neighbouring Boroughs have been approached to see if they have capacity to take any of our unmet need.

- 5.7 Six development options were also consulted upon:
  - Urban intensification
  - Urban expansion
  - Expansion of 2nd tier settlements
  - Expansion of 2nd, 3rd and 4th tier settlement
  - Creation of a single new settlement through the merger of existing settlements
  - Creation of a freestanding new settlement.
- 5.8 In respect of traveller accommodation, the Stage 1 consultation highlighted that the evidence of Traveller accommodation need was being updated to provide robust evidence of the accommodation needs of this group. No reference was made to options for how or where any identified need could be met.
- Alongside the consultation on the options for growth, a 'Call for Sites' consultation was undertaken, inviting landowners and developers to submit details of any land that was or could be made available for development over the plan period, including land for traveller sites. All existing traveller sites in the borough were sent a letter as part of this consultation. While additional sites were promoted, many of which were in the Green Belt, no sites were submitted either wholly or partially for Gypsies and Travellers.

#### Regulation 18 Stage 2 consultation

- 5.10 Since the Stage 1 consultation, the evidence base has been updated in respect of the future development needs of the Borough. The Regulation 18 Stage 2 consultation sought views on 4 possible approaches to distributing development over the plan period. Potential site allocations were provided to support option B, taking account of environmental constraints, the role of the Green Belt and sustainability factors (Figure 14 of the LPCS Partial Review and Site Allocations Main Document).
- 5.11 An updated SHLAA supported this consultation. Given the shortage of deliverable and developable land to meet identified development needs in the previous SHLAA, the methodology was amended to set aside Green Belt policy as a constraint to assessing the suitability, availability, and achievability of sites.
- 5.12 The consultation confirmed that the evidence of traveller accommodation need had been updated (GTAA, 2018) and showed an increase in pitch need from 16 pitches to 24 pitches up to 2028 (the Core Strategy plan period) as well as an assessment of need up to 2036 (the revised plan period) for an additional 7 pitches (at total of 31 pitches between 2017 2036).

- 5.13 A further 'Call for Sites' consultation was carried out alongside the Stage 2 consultation but again no sites were promoted for traveller accommodation despite the amendment to the methodology to consider sites within the Green Belt.
- 5.14 The GTAA (2018) is in the process of being updated to provide an assessment of need for the period 2022 2040, the revised Local Plan period. It is anticipated that the need for additional pitches will increase since the last GTAA given the increase in the number of pitches and family growth since 2017.

#### Next steps

- 5.15 The Council is aware of the need keep its evidence base up to date and has commissioned Opinion Research Services (ORS) to update the GTAA to identify the future accommodation requirements of Gypsies and Travellers up to 2040. The outputs from this will be made available as part of the evidence base supporting the emerging Local Plan Partial Review and Site Allocations. In view of the increased number of pitches that have been delivered since 2017 (Table 3), it is anticipated that the need figure identified in the GTAA (2018) (Table 2) will increase above the identified need for 31 pitches.
- 5.16 In terms of responding to identified need, the GTAA (2018) recommends that only the need from those households who meet the planning definition and those unknown households who subsequently demonstrate that they meet the definition should formally be considered as need arising from the GTAA. It goes on to recommend that:
  - need arising from households who meet the planning definition should be addressed through site allocations or through the intensification/expansion of existing sites (para 8.3).
  - need from unknown households, windfall applications and any need from households in bricks and mortar, should be addressed via a criteria-based policy is used to guide such development (as suggested in the PPTS, 2015) (para 8.4), and
  - need arising from those households who do not meet the planning definition should be addressed as part of general housing need, through separate Local Plan policies (para 8.5).
- 5.17 In line with the PPTS the Council are exploring a number of ways of meeting the identified needs of Gypsies and Travellers who meet the planning definition. These are as follows:
  - Liaising with existing site occupants to identify opportunities to accommodate additional need generated by existing households either by
    - intensifying the number of caravans on existing sites or
    - enlargement to accommodate need, taking account of impact on the Green Belt.
  - Reviewing public sector land within the urban area, rural settlements inset from the
     Green Belt and on the edge of existing settlements.

- Reviewing existing sites promoted through the Strategic Housing Land Availability
   Assessment (SHLAA) which either fell below the threshold or were assessed as being
   either not suitable or achievable.
- Reviewing planning applications for the use of land as a caravan site that were withdrawn or refused planning applications.
- Undertaking discussions with neighbouring authorities to identify any opportunities to meet any of our unmet need.