



Five-Year Gypsy and Traveller Pitch Supply Statement 2024-2029

April 2024



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1 Introduction

- 1.1 The Planning Policy for Traveller Sites (PPTS) 2023, requires local planning authorities to set pitch/plot targets for Gypsies and Travellers and Travelling Showpeople (as defined in Annex 1), to address the likely permanent and transit site accommodation needs of travellers in their area. As there are no Travelling Showmen sites in Gravesham and no identified need for such sites, this Statement focuses solely on how the identified accommodation needs of Gypsies and Travellers who were living in the Borough at the time of the GTAA will be met.
- 1.2 The identified need for new Gypsy and Traveller pitches in the borough is derived from the Gypsy and Traveller Accommodation Assessment (GTAA) 2022. This updated GTAA supersedes the 2018 GTAA. It updates and assesses need from the existing pitches in the Borough, over the period 1 April 2022 – 31 March 2040, including the proposed occupants of new pitches permitted since 2017. This covers the remaining 6 years of the Local Plan Core Strategy plan period (2022 – 28) and will inform the evidence base for the emerging Local Plan period (2025 – 2040).
- 1.3 The Council is aware that the PPTS and the planning definition of Gypsies and Traveller set out in Annex 1 was updated in December 2023, but as the GTAA was completed in November 2022 and pre-dates the change in the definition, this Statement will reflect the identified accommodation needs of those Travellers who meet the 2015 PPTS definition. It is acknowledged that this may have implications upon the November 2022 GTAA, and the Council is seeking further clarity from the consultants on the implications of the change in definition on identified need in Gravesham.
- 1.4 This Statement provides a summary of the current identified need for new pitches and the 5-year supply position of deliverable Gypsy and Traveller sites within Gravesham for the period April 2024 – March 2029. It will be used to inform the consideration of planning applications for Gypsy and Traveller sites/pitches.

2 Identified need.

- 2.1 The updated current and future need for Gypsy and Traveller pitches is assessed and presented in the Gravesham GTAA (2022). 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, 2015. While not a requirement, it also assesses the accommodation needs of those Gypsies and Travellers that do not meet the planning definition.
- 2.1 Table 1 shows the total pitch need over the period 2022 – 2040, which is the plan period for the emerging Local Plan. However, for the purposes of this Statement, the focus is on need between April 2022 and March 2028.

Table 1 – Gypsy and Traveller pitch needs April 2022 - 2040

Households that meet the planning definition (pre-Dec 2023 definition)	2022 - 2027	2027-2028	2028 - 2040	2022 - 2040
Total	19	1	20	40
Annual	3.8	1	1.66	2.22

2.3 Table 2 shows the identified pitch need figure broken down into 5-year periods. This shows that there is the greatest need to deliver pitches in the first 5-year period, where between April 2022 – March 2027 there is a need to deliver 19 pitches. Against the Local Plan Core Strategy plan period, this need would increase to 20 pitches.

2.4 For completeness the table includes the identified needs for households who do not meet the planning definition and those where it was undetermined whether they met the planning definition. However, as already mentioned, the needs of these households do not form the basis of this statement and will be addressed through a criteria-based policy in the emerging Local Plan.

Table 2 - Gypsy and Traveller pitch needs 1 April 2022 – 31 March 2040

Period 1 April – 31 March	Pitch Need Meet the Planning Definition (PPTS 2015)	Pitch Need Non-Planning Definition (PPTS 2015)	Pitch Need Undetermined whether they meet the Planning definition or not	Overall Pitch Requirement
2022 - 2027	19	12	0	31
2028	1	0	0	1
2028 - 2032	4	4	1	9
2032 – 2037	10	1	1	12
2037 -2040	6	1	0	7
Total	40 ¹	18	2	60

¹The need figure includes need from two sites which with planning permissions granted prior to 2022 but were in fact were unimplemented in 2022. In the case of one of these sites, the need will have been addressed through the implementation of this pre 2022 permission. Any amendment to identified need will be picked up in the review to be undertaken by the consultants when reviewing those households who currently are assessed as not meeting the definition.

3 Gypsy and Traveller need between April 2022 – March 2024

- 3.1 To establish the level of outstanding need as of 1 April 2024 (the base date of this Statement), the annual requirement for pitches, derived from April 2022 – March 2027 (i.e. 3.8 pitches per annum $(19 \div 5) \times 2$ years) has been applied from the base date of the GTAA (April 2022) to the base date of this statement (March 2024). This is divided into 2 scenarios; the first sets out the identified need for those households who meet the planning definition, and the second sets out the identified need based on the total need identified in the GTAA for this period. **This concludes that as of March 2024 there is an outstanding need of 7.6 pitches for those households who meet the planning definition, and 12.4 pitches based on overall identified needs.**

Table 3 Gypsy and Traveller pitch need April 2022 – March 2024

	Scenario 1: Pitch Need Meet the Planning Definition (PPTS 2015)	Scenario 2: Overall Pitch Requirement
April 2022 – March 2024	7.6 pitches $((19 \div 5 = 3.8) \times 2$ years)	12.4 pitches $((31 \div 5 = 6.2) \times 2$ years)
Total Pitches	7.6	12.4

Delivery of Pitches between March 2022 and April 2024

- 3.2 **No new pitches have been granted planning consent between April 2022 – March 2024** and hence there remains a shortfall of 7.6 pitches as of April 2024.

Table 4 Pitch delivery between March 2022 – April 2024)

	Scenario 1: Pitch Need Meet the Planning Definition (PPTS 2015)	Scenario 2: Overall Pitch Requirement
Need (April 2022 – March 2024)	7.6 pitches $((19 \div 5 = 3.8) \times 2$ years)	12.4 pitches $((31 \div 5 = 6.2) \times 2$ years)
Supply (April 2022 – 2024)	0	0
Total Pitches	7.6	12.4

Gypsy and Traveller pitch need April 2024 – March 2029

- 3.3 Table 5 below sets out the pitch need for the next 5 years (April 2024 – March 2029). This is divided into 2 scenarios as above and uses the annualised pitch requirement for the April 2022 – March 2027 period and the annualised pitch requirement for the April 2027 – March 2032 period.

Table 5 Gypsy and Traveller 5-year Pitch Need – April 2024 – March 2029

	Scenario 1: Pitch Need Meet the Planning Definition (PPTS 2015)	Scenario 2: Overall Pitch Requirement
April 2024 – March 2027	11.4 pitches ($(19 \div 5 = 3.8) \times 3$ years)	18.6 pitches ($(31 \div 5 = 6.2) \times 3$ years)
April 2027 – March 2028	1 pitch	1 pitch
April 2028 – March 2032	0.8 pitches ($(4 \div 5 = 0.8) \times 1$ year)	1.8 pitches ($(9 \div 5 = 1.8) \times 1$ year)
Total Pitches	13.2	21.4

Gypsy and Traveller 5-year Pitch Requirement April 2024 – March 2029

- 3.4 The calculation of the 5-year pitch requirement for those who meet the planning definition and the overall requirement, for the period April 2024 – March 2029, is set out in Table 6 below.

Table 6– Pitch needs April 2024 – March 2029

	Scenario 1: Pitch Need Meet the Planning Definition (PPTS 2015)	Scenario 2: Overall Pitch Requirement
Pitch Need (April 2022 – March 2024)		
Table 3 Total	7.6	12.4
Annualised Five Year Requirement	2.64	4.28
Supply		
Pitches with implementable permission deliverable within period	0	0
Deliverable Land Supply from Site Allocations within period	0	0
Outstanding Need (April 2022 – March 2024)		
Table 3 - Table 4 Totals	7.6 pitches	12.4 pitches
Pitch Need (April 2024 – March 2029)		
Table 5 Total	13.2 pitches	21.4 pitches
5-year Pitch Requirement (April 2024 – March 2029)		
Outstanding need (April 2022 – March 2024) + 5- year land requirement (April 2024 – March 2029)	20.8 pitches (7.6 + 13.2)	33.8 pitches (12.4 + 21.4)
Annual 5 Year Pitch Requirement	4.16 pitches	6.76 pitches

4 Deliverable Supply of Gypsy and Traveller Pitches

- 4.1 There were no sites with an extant planning permission for additional Gypsy and Traveller pitches, as of March 2024. At the time, the GTAA was undertaken, there were two sites with extant planning consents, and need from the prospective occupants were taken into account along with the fact that planning permission had been granted and was likely to be implemented
- 4.2 There are no allocated sites in the Local Plan Core Strategy, but sites will be allocated in the emerging Local Plan Review and Site Allocations.

- 4.3 There is one pitch available on the Council's public site at Denton and one available on a private site, but this supply has been taken into account in the GTAA

5 Conclusion

- 5.1 From Table 6 it can be seen that the Council cannot currently demonstrate a 5-year supply of deliverable pitches in line with national policy. This is a matter that will be addressed through the emerging Local Plan Review and Site Allocations.

6 Addressing GTAA Need going forward.

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

- 6.1 Gravesham's adopted development strategy to meet the Borough's identified development needs is set out in Core Strategy Policy CS02 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.
- 6.2 In line with the adopted development strategy, Strategic Objective SO2 of the Core Strategy 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 identify sites to meet identified Traveller.

The emerging Local Plan

- 6.3 The council is reviewing the Local Plan Core Strategy, preparing Site Allocations and a Development Management Policies Document. In the light of population increases 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 2018 and the Stage 2 consultation in 2020.

Regulation 18 Stage 1 consultation

- 6.4 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.
- 6.5 A draft Strategic Housing Land Availability Assessment (SHLAA) supported this consultation. It sets 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.

- 6.6 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.
- 6.7 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.
- 6.8 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.
- 6.9 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 for travellers were submitted.

Regulation 18 Stage 2 consultation

- 6.10 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](#)).
- 6.11 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.
- 6.12 The consultation confirmed that the evidence of traveller accommodation need had been updated (GTAA 2017) 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).

- 6.13 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.
- 6.14 The GTAA 2017 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

- 6.15 In terms of responding to identified need, the GTAA (2202) 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 public sites should be addressed through the consideration of additional public sites. (para 8.5)
 - need arising from households who meet the planning definition should be addressed through site allocations or through the intensification/expansion of existing sites (para 8.6).
 - need from in-migration, windfall applications and any need from households in bricks and mortar, should be addressed via a criteria-based policy to guide such development (as suggested in the PPTS) (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).
- 6.16 The next step is therefore to identify sufficient deliverable sites to meet current needs and need in the first five years for those households who meet the planning definition. **As detailed in the first part of this statement there is a need to identify sufficient land to deliver 21 pitches.**
- 6.17 The Council are exploring a number of ways of meeting this identified need going forward 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.
 - Review of public sector land within the urban area, rural settlements inset from the Green Belt and on the edge of existing settlements.
 - Review of existing sites promoted through the Strategic Housing Land Availability Assessment (SHLAA)
 - Review of planning applications for the use of land as a caravan site that were withdrawn or refused planning applications.
 - Discussions with neighbouring authorities to identify any opportunities to meet any of our unmet need.