

Local Plan Review

Publication Plan

Gypsy & Traveller Topic Paper

November 2022

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1. Introduction

- 1.1 A key element of the new Local Plan is to allocate sites for different uses where a need has been demonstrated, including for gypsy and traveller pitches, and travelling showperson plots. This topic paper sets out what we are required to consider when planning for gypsies, travellers and travelling showpeople, and the approach we have taken in gathering evidence of needs and how we have assessed the suitability and deliverability of site options. As the Council is unable to meet its identified need for new gypsy and traveller pitches in full, this paper sets out the steps we have taken to explore additional sources of supply and will set out our strategy moving forward for addressing this unmet need as far as possible.

2. National Policy

- 2.1 In 2015 the Government published an updated ‘*Planning Policy for Traveller Sites*’ (PPTS) setting out Local Planning Authorities’ requirements to plan for Gypsies and Travellers. This set out national planning policy on Gypsies and Travellers to be read in conjunction with the National Planning Policy Framework (NPPF), which was last updated in 2021.
- 2.2 The PPTS confirms that Local Planning Authorities (LPAs) should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs of Gypsies and Travellers. To achieve this, LPAs should, in producing their Local Plan:
- identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets;
 - identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15;
 - consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a Duty to Cooperate on planning issues that cross administrative boundaries);
 - 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; and
 - protect local amenity and environment.
- 2.3 The PPTS sets out the definition of Gypsies and Travellers as follows:

“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.

“In determining whether persons are “Gypsy and Travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters

- (a) Whether they previously led a nomadic habit of life*
- (b) The reasons for ceasing their nomadic habit of life*
- (c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”*

2.4 The PPTS sets of the definition of travelling showpeople as follows:

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 The PPTS confirms that criteria should be set to guide land supply allocations where there is identified need, and plans should include criteria based policies to provide a basis for decisions should proposals for pitches/plots come forward through a planning application.

3. The current Development Plan

Core Strategy (2012)

3.1 In December 2012 the Council adopted its Core Strategy as the first part of its Local Plan. It was adopted after the introduction of the NPPF and PPTS and includes detailed criteria (see Core Strategy Policy H6) for determining planning applications for Gypsy and Traveller pitches, as well as for allocating sites in the subsequent Site Allocations Document (SAD) DPD. When allocating new Gypsy and Traveller sites through the SAD it had to be demonstrated that they are in accordance with the NPPF, the PPTS and Core Strategy Policy H6 criteria. Core Strategy Policy H6 also set the district’s pitch and plot requirements up until 2028 and was informed by the latest evidence at the time – the 2008 Gypsy and Traveller Accommodation Assessment (GTAA).

Site Allocations Document (2018)

3.2 In September 2018 the second part of the existing Local Plan was adopted – the Site Allocations Document (SAD). The SAD allocated the residual pitches required up to 2028 as set out in Core Strategy Policy H6. As a significant number of pitches had already come forward since the adoption of the Core Strategy through the Development Management process the residual requirement for allocation was for 20 pitches. These pitches are detailed in Policy SAD4 of the SAD which allocated additional pitches within existing gypsy and traveller sites, but saw the sites remaining in the Green Belt. Policy SAD4 confirmed that ‘*as an exception to the planning policies*

relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the SAD will be acceptable in principle.'

4. Local evidence of need

Gypsy and Traveller Accommodation Assessment 2021

- 4.1 Our latest evidence of need is set out in our [Gypsy and Traveller Accommodation Assessment \(GTAA\) 2021](#). This was undertaken by Opinion Research Services (ORS) who are one of the leading consultancy firms who prepare GTAA's and have had their needs assessment methodology endorsed through numerous appeals and examinations throughout the country.
- 4.2 At the time of the fieldwork the GTAA (2021) identified 35 sites/yards within the district with a total of 164 pitches/plots. The vast majority of these (20 sites, 129 pitches) are on private gypsy and traveller sites with these pitches having permanent planning permission. The GTAA was based on primary data gathering in the form of face to face interviews with Gypsy and Traveller families with 126 interviews achieved representing a strong response rate of 79%.
- 4.3 Following the interviews, future needs were calculated derived from those households who met the planning definition of a gypsy and traveller as well as a separate need figure for those who did not meet the planning definition. In addition, an assumed need figure was derived for those undetermined households/individuals (i.e where an interview was not achieved). The need for gypsies and travellers who met the planning definition was for **121 pitches** as set out below:

Years	0-5	6-10	11-15	16-18	TOTAL
	2021-25	2036-30	2031-35	2036-38	
	72	11	24	14	121

- 4.4 The large element of this need is as a result of expected household formation, teenagers on sites who will require a pitch during the plan period and existing concealed/over-crowded households. Only a very small proportion of the need (3 pitches) is from in-migration.
- 4.5 The GTAA also identified a need for **24 pitches** from those households who did not meet the planning definition and potentially up to an additional **9 pitches** from undetermined households where interviews were not achieved.
- 4.6 For travelling showpeople, the GTAA identified a need solely based upon new household formation from the one existing travelling showperson site within the district. This identified a need for **3 additional plots** for travelling showpeople, however this need only starts to emerge from 2031 onwards.

5. Approach to addressing needs

- 5.1 The GTAA (2021) concluded that needs from households that met the PPTS planning definition (121 pitches) is addressed through new pitch allocations and the intensification or expansion of existing sites. The GTAA recommends that need for those households who do not fall within the PPTS planning definition should be met as part of general housing need and through separate Local Plan housing policies. Meanwhile, meeting the need from underdetermined households, those living in bricks and mortar and need arising from in-migration could be considered on their merits against a criteria-based policy.

Focus on meeting the 5 years need for households meeting the planning definition

- 5.2 The PPTS requires Local Plans to identify a 5 year supply of deliverable sites (site allocations) to meet identified needs (PPTS para. 10) . Meanwhile, the PPTS confirms that developable sites or broad locations for sites should be identified for years 6-10 and 11-15 where possible. Given this, and the approach to addressing the needs of those households that do not meet the planning definition or their need was undermined (at para 5.1 above), **the initial focus has been on identifying sites/pitches to allocate to meet the 5 year need of households who meet the planning definition of a gypsy and traveller.** In total the GTAA identified a 5 year need of **72 pitches** from these households who meet the planning definition.

Focus on expanding existing privately owned sites

- 5.3 Given that all the identified need comes from households on privately owned sites, the GTAA suggested that need is most likely to be addressed on private sites. As the vast majority of this need is from existing families already residing in the district (rather than in-migration) it is deemed appropriate that **the principal strategy to meet the needs is to intensify and/or expand existing sites where a need has been evidenced**, instead of allocating public sites. Equally, it is not deemed appropriate to allocate sites in third party landownership where there would be no guarantee that the households/individuals currently living in the district with an identified need would secure a pitch.

Pitch Deliverability Study (2021)

- 5.4 Alongside the GTAA a [Pitch Deliverability Study \(2021\)](#) (PDS) was prepared that examined if additional pitches could be accommodated on sites where the GTAA (2021) identified a need from households who met the planning definition and who's need for a pitch emerged in the first 5 years of the Plan. The purpose of the PDS was to assess the suitability and deliverability of these sites against key site assessment criteria (e.g impact of historic environment, highways access, site within flood zone etc). in addition to the assessment against key planning considerations, the PDS examined the sites capacity to accommodate additional pitches as well as confirming with the site owner a willingness to deliver the allocation. The PDS assessments and

findings have been used directly to inform which of the sites with households with a 5 year need have capacity to accommodate this need, and as such, are proposed for allocation.

5.5 Following an initial stage 1 assessment the PDS excluded the following 8 sites from the detailed stage 2 assessment:

- 59a Long Lane
- Hospital Lane
- Land of Malthouse Lane
- Land rear of Squirrels Rest
- New Stables
- Pool House Barn
- Rose Meadow Farm
- Teddesley Road

5.6 The reasons for exclusion included:

- That there are some significant highways concerns for some of the sites.
- That some lie on land that is located in flood zones 2 and 3.
- Further encroachment into the Green Belt or proximity to an AONB.
- A loss of brick clay mineral safeguarding.

5.7 A further 4 sites were not taken forward to stage 2 assessment (Fishponds Caravan Park, High House, Oak Tree Farm and St James Caravan Park) due to a combination of highways issues and the intensification of larger sites that could have a significant impact on surrounding areas.

5.8 This resulted in 18 sites being subject to the further detailed stage 2 assessment with the five-year requirement from households on these totalled 49 pitches. However, following the assessment of site capacity to accommodate additional pitches and after speaking to families about the deliverability of additional pitches, the PDS concluded that there was only capacity to deliver **42 pitches** for allocation towards the 5 year requirement. This is broken down on a site by site basis in Chapter 5 of the PDS. These 42 were then included with our pitch allocations policy (Policy SA4) in our Preferred Options consultation.

5.9 The approach of focusing on allocating the sites that were assessed as deliverable through the PDS is in line with the PDS conclusions which recommended that:

‘...the Council consider specific allocations for pitches on the sites that have been assessed in order to make a clear link between the need that has been identified and the sites that are in a position to potentially meet this need’.

5.10 This approach ensure that allocations are specifically focused on sites where we know there is a need emerging within years 0-5, the household in need meets the planning definition, and there is capacity to deliver a pitch on site. This approach of directly

tying the allocation to the household where the need emerges avoid a situation where sites are allocated to meet a numeral target without any guarantee that an application for a pitch on the site will be forthcoming. This appears to have been the case with our Site Allocations Document (2018) where Policy SAD4 allocated 20 pitches on specific sites in order to meet our adopted Core Strategy requirement for pitches that had been based on a 2008 GTAA. However as of September 2022, only 5 pitches have come forward through a planning application despite engaging with families in advance of allocating the site to confirm that they required additional pitches. Equally, it is very unlikely that allocating new private sites within third party land ownership would meet the specific household need identified in the GTAA 2021, as there would be no mechanism to ensure these sites were sold to the households with the identified need. In practice, this would likely result in these allocated sites remaining unoccupied, or being sold to the highest bidder, which could result in additional immigration of new families into the district and would not address the evidenced need and exacerbating future baseline need requirements. In contrast, publicly owned sites offer an element of control as to which families the pitches are provided to. As such, further exploration for identifying a publicly run site to meet unmet needs has been explored further following the Regulation 18 Preferred Options consultation, as set out in Chapter 7 of this topic paper.

- 5.11 Therefore, in summary, our strategy for meeting our Gypsy and Traveller needs is to allocate sites to meet identified needs for years 0-5 of those households who meet the planning definition of a gypsy and traveller as far as possible. Determining needs for years 6-15 can be less certain and therefore needs emerging in years 6-15 will be addressed through sites coming through the development management process and considered against a criteria-based policy (Policy HC8), or through a review of the Local Plan when commenced. Policy HC8 will also be used for addressing needs of households who do not meet the planning definition, any undermined need, and for needs for new travelling showperson plots where the need is generated from household growth on a single existing site, and do not emerge to years 6-10.
- 5.12 It is expected that new pitch proposals for years 6-15 will predominantly come forward through intensification and expansion of existing sites with the PDS identifying options for 24 additional pitches against a need emerging in years 6-15 of 34 pitches from households who meet the planning definition. Existing sites are identified on the policies maps, and these are considered the broad locations for further traveller pitches. The Council is confident that there is adequate scope for a supply of pitches to come forward through development management process against the new criteria-based policy - Policy HC9 (see Appendix E). When examining the past delivery of new pitches, a very significant proportion of our supply of permanent gypsy and traveller has come forwarded on un-allocated sites, coming forward through ad-hoc planning applications. This can be demonstrated in Appendix D which shows a recent track record of delivering traveller sites through the development management process.

6. Preferred Options (Regulation 18) consultation

- 6.1 The Preferred Options Policy SA6 proposed for allocation 42 pitches. These are identified for households with a need within years 0-5, who meet the planning definition, and are on sites identified as suitable/deliverable in the PDS. An extract of Policy SA6 from the Preferred Options consultation is set out below:

SA6: Gypsy and Traveller Allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Site	Site ref no.	Total no. pitch allocations	Proforma page number
New Acre Stables, Penkridge	GT01	4	160
Granary Cottage, Slade Heath	GT05	1	155
The Spinney, Slade Heath	GT06	2	157
The Bungalow, Coven	GT07	3	156
Brinsford Bridge, Coven Heath	GT08	7	153
Brickyard Cottage, Essington	GT14	2	152
The Stables, Upper Landywood	GT17	3	158
Park Lodge, Wombourne	GT18	1	161
Glenside, Slade Heath	GT23	1	154
Kingswood Colliery, Great Wyrley	GT32	8	162
Fair Haven, Cross Green	GT33	4	159
Anvil Park, Essington	GT34	1	151
122 Streets Lane, Great Wyrley	GT35	5	163

All sites are existing established sites or direct extensions to these, and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC8, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process. Proposals should be consistent with other Development Management policies in the Local Plan.

- 6.2 In line with the approach that was deemed appropriate by the Planning Inspector examining our Site Allocations Document (2018), the draft policy confirms the following:

‘As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.’

- 6.3 This reflects that the vast majority of our sites are located in isolated rural locations and are washed over by Green Belt and is not considered necessary for the site to be removed from the Green Belt for the pitches to be delivered. This is demonstrated by the fact that all sites/pitches allocated in the SAD that subsequently came forward as planning applications have been recommended for approval and subsequently approved at Planning Committee.
- 6.4 As the Council was only able to identify suitable sites for 42 pitches against a 5 year requirement in the GTAA of 72 pitches, the Preferred Options consultation sought view on if there was another approach to meeting our gypsy and traveller needs and requested that other site suggestions were put forward for exploration. The results of this request and the steps we have taken to explore further supply options are set out in Chapter 7.

7. Changes to Policy SA6 and exploring additional pitch supply

- 7.1 Through the Preferred Options consultation only a very limited number of representations received related to gypsies and travellers with key headline responses set out below.
- Amenity concerns raised relating to site GT35 (Streets Lane)
 - Lack of ecology evidence to support the pitch allocations
 - Highways impacts as a result of new pitches will require early engagement
 - Concerns relating to the impact of expanding site GT08 on the Staffordshire and Worcestershire Canal without substantial screening
 - A fairer distribution should be made across all 27 Parishes.
 - Concerned about proposals to regularise unauthorised pitches to meet South Staffordshire’s Gypsy and Traveller needs. Council need try to address the issue through Duty to Cooperate discussions.
 - Local amenities should be easily accessed from selected sites.

New site suggestions

- 7.2 Through the Preferred Options consultation only one new site option was put forward for consideration as a Gypsy and Traveller site, on land off Queens Road, Calf Heath. This was not put forward by an existing traveller family, was not suggested as a public site and appeared to only have been suggested as part of a larger housing proposal, with it appearing conditional on the housing allocation being allocated. In addition, it is noted that part of the site is within flood Zone 2. Therefore, as Calf Heath is a Tier 5 settlement identified as unsuitable for housing growth and is not adjacent to or within

the control of a family with an identified unmet pitch need the site has been scoped out and is not taken forward for consideration through a PDS update.

122 Streets Lane (GT35)

- 7.3 The GTAA 2021 identified a 5 year need for 5 pitches from the residents of 122 Street Lane with the accompanying Pitch Deliverability Study 2021 concluding that this need could be met on a new traveller site to the rear of the property.
- 7.4 As part of the Regulation 18 Preferred Options consultation a number of objections were raised to its allocation as a permanent traveller site with concerns largely relating to the impact on amenity of local residents. This issue was flagged with an 'amber' score through the Pitch Deliverability Study but the Preferred Options consultation responses did raise a number of significant concerns relating to amenity, including existing noise and odour issue that allocating the site for an expanded traveller site could exasperate.
- 7.5 Concern was also raised through the representations that the site was being proposed even after a proposal for four traveller caravans on the sites were refused. Having subsequently reviewed the Inspectors decision and undertaken a planning history review of the site it has been concluded that the caravans on site are currently within the curtilage of the domestic dwelling and therefore it does not represent an option for an unauthorised site to be made permanent, but rather a wholly new site. The legal view is that the caravans on site are ancillary and unenforceable but allocating the site for 5 pitches as proposed in the Preferred Options consultation would not be ancillary and could lead to a greater level of development. The inspector's decision for the proposed four caravans noted that the proposal would have a demonstrably harmful impact on the openness of the Green Belt and result in encroachment into the countryside and concluded that '*...landscaping would not obscure or minimise the presence of the development in a way that the openness of the Green Belt could be said to be preserved*'. The PDS did undertake a 'Stage 1 Initial Review' of sites and discounted some site options prior to be taken to a stage 2 assessment, including proposals that would see unacceptable encroachment into the Green Belt. After reflecting on the inspector's clear position on the impact on openness and encroachment into the Green Belt, it is concluded that this site should too be discounted due to its substantial harm to the Green Belt and as such is not proposed for allocation.

Exploring options on publicly owned land

- 7.6 Taking account of the PDS findings and further follow up work, all options to meet pitch needs on sites where the need is generated in years 0-5 have been considered and only **37 suitable sites** have been identified in the Publication Plan. Following the Preferred Options consultation further efforts have been made to explore options to deliver publicly run sites within the district. The key focus has been on trying to identify options for publicly run sites, as this would give the Council some control of

who the pitches were allocated to, and as such, can help ensure that the pitches were meeting the identified family need.

- 7.7 First consideration was given to South Staffordshire District Council owned land with a review with the [Gypsy and Traveller Public Sites Search – November 2021](#), published alongside the Preferred Options consultation. This assessed 199 parcels of land in total however none were found as suitable for development due to key constraints on the land. The vast majority of these sites were public open space that have not been identified as surplus to requirements.
- 7.8 Following the review of district council owned land, consideration was given to land owned by Staffordshire County Council that has previously been suggested to housing through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. The 'Gypsy and Traveller site assessment – Staffordshire County Council owned land' assessed large farmsteads which were broken down into 10 separate parcels for assessment. The assessment identified significant initial concerns for the vast majority of sites, often on access/connectivity grounds. Only one site, 'parcel 6 – Land south of Langley Road' was identified as potentially suitable for a public gypsy and traveller site. However, subsequent to the assessment taking place Staffordshire County Council has confirmed that they do not consider that these sites would be acceptable or viable unless as part of a wider strategic development area / site allocation and comprehensive master-planning exercise (See Appendix F). As none of these parcels have been assessed as suitable for housing allocation through our site assessment process, and there is not a willing landowner to deliver them as a standalone gypsy and traveller site, **none of the parcels assessed (including parcel 6) are considered deliverable.**
- 7.9 The Council has also consulted with other public bodies through our Regulation 18 Preferred Options consultation and previous call for sites consultations. This process has not identified any sites suggestions from other public bodies (such as NHS/Integrate Care System) for a gypsy and traveller site.

Exploring options on housing site allocations

- 7.10 In addition to considering publicly owned land, the Council contacted site promoters for proposed housing allocations in March 2022 to confirm if in principle they would be willing to transfer a proportion of their site to be run as a public gypsy and traveller site. In total we received responses from 14 site promoters but none of them responded confirming they would be willing to transfer part of their existing proposed allocation for use as a public gypsy and traveller site. Miller Homes promoting 'land off Holly Lane, Great Wyrley' (Ref: 536a) were open to exploring if a gypsy and traveller site could be accommodated, although this was contingent on additional green belt release for housing on land they were promoting adjacent to their allocation. However, this wider land parcel had been assessed through our Housing Site Assessment Topic Paper as unsuitable. The email request and redacted responses can be found in Appendix C

Exploring meeting needs on publicly owned sites in neighbouring authorities

7.11 In tandem with exploring supply options to meet (or reduce) our unmet need for Gypsy and Traveller pitches as set out above, we have also contacted neighbouring authorities to explore if they are able to assist us in meeting our unmet needs under the Duty to Cooperate. In January 2022 we wrote to all authorities either adjoining South Staffordshire and/or in our Housing Market Area (HMA). In the letter, dated 14th January 2022, we set out the position on our evidenced need as confirmed through our GTAA 2021 and confirmed how we had considered supply options through of PDS 2021, as well as providing our assessment of district council owned land. In the letter we asked if there were options to either accommodate some or all of these unmet needs on existing public sites within the administrative areas of Duty to Cooperate bodies or whether new public sites could be created. In total 14 authorities¹ were written to with 11 responses received from the following authorities:

- Association of Black Country Authorities
- Birmingham City Council
- Bromsgrove District Council
- Cannock District Council
- Lichfield District Council
- Redditch Borough Council
- Shropshire Council
- Stafford Borough Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Wyre Forest District Council

7.12 No respondents indicated that they were able to assist in supplying additional pitches to meet our unmet needs. The letter of 14th January 2022 and responses can be found in Appendix A.

7.13 Following on from our letter of 14th January 2022 and following further exploration of supply options on Staffordshire County Council land and proposed housing allocations, we were able to write to neighbouring authorities again on 8th August 2022 to update them on our position and to set out the further work undertaken to explore supply options. In the letter we provided a summary of previous responses and asked again if there were plots available on existing sites and sought clarification on the additional steps taken to explore supply, including on Green Belt sites, in order to understand if a consistent approach had been taken. In total we received 9 responses from the following authorities:

- Birmingham City Council
- Bromsgrove District Council
- Cannock District Council

¹ Association of Black Country Authorities counted as one authority

- Lichfield District Council
- Shropshire Council
- Stafford Borough Council
- Stratford-on-Avon District Council
- Tamworth Borough Council
- Wyre Forest District Council

7.14 Again, no responses indicated that neighbouring authorities were in a position to assist with additional supply to reduce our unmet needs. The letter of 8th August 2022 and responses can be found in Appendix B.

7.15 Correspondence with neighbouring authorities to date suggests a number of them have not considered the same breadth of options for considering traveller site options that South Staffordshire has (e.g considering green belt options and land in public ownership). As such, requesting that neighbouring authorities take a consistent approach for exploring pitch will be an ongoing focus for South Staffordshire Council through the Duty to Cooperate.

8. Publication Plan (Regulation 19) consultation and next steps

8.1 Having explored options for identifying additional supply through the Duty to Cooperate, assessing Council owned land and exploring options for gypsy and traveller sites as part of housing allocations, at the current time no additional available and suitable supply options have been identified.

8.2 In addition, having reviewed representations to the Preferred Option consultation and having reconsidered site GT35: 122 Streets Lane in light of a previous Inspector's decision on the site, the site is no longer considered suitable for allocation due to its encroaching effect on the Green Belt. This has the effect of reducing the suitable pitch options to 37 against a 5 year need of 121 pitches up to 2038 and a five year need of 72 pitches.

8.3 The 37 pitches proposed for allocation are set out in an updated Policy SA6 for the Publication Plan below:

Policy SA6: Gypsy and Traveller Allocations

Gypsy and Traveller pitches are allocated at the locations set out in the table below to meet identified family needs.

The new pitch allocations must be located within the red line boundary of the site as shown in Appendix D.

Site	Site ref no.	Total no. pitch allocations	Proforma page number
New Acre Stables, Penkridge	GT01	4	160
Granary Cottage, Slade Heath	GT05	1	155
The Spinney, Slade Heath	GT06	2	157
The Bungalow, Coven	GT07	3	156
Brinsford Bridge, Coven Heath	GT08	7	153
Brickyard Cottage, Essington	GT14	2	152
The Stables, Upper Landywood	GT17	3	158
Park Lodge, Wombourne	GT18	1	161
Glenside, Slade Heath	GT23	1	154
Kingswood Colliery, Great Wyrley	GT32	8	162
Fair Haven, Cross Green	GT33	4	159
Anvil Park, Essington	GT34	1	151

All sites are existing established sites or direct extensions to these and are often in remote rural locations and washed over by the West Midlands Green Belt. As an exception to the planning policies relating to the location of Gypsy and Traveller pitch provision in the Green Belt, pitches identified in the Green Belt through the Local Plan will be acceptable in principle where planning applications are submitted for the specified number of additional pitches allocated in the Local Plan.

Planning applications on these sites will need to be in accordance with the criteria in Policy HC8, any site-specific planning requirements set out in Appendix D, and any other mitigation which is deemed necessary through the development management process.

Proposals should be consistent with other policies in the Local Plan.

- 8.4 Policy DS4 of the Publication Plan (see Appendix E) acknowledges the Council's unmet needs for traveller sites set out in this paper and the steps taken to consider options to address it. The policy commits the Council to continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet our unmet need and confirms that the Council will respond positively to windfall proposals that accord with Policy HC9. The Council will continue to monitor the delivery of sites, including the delivery of windfall sites, to inform whether a review of the policy is needed.



Sent via email
FAO: Cabinet Members for Planning

Please ask for: [REDACTED]

Direct Dial: [REDACTED]

Email: [REDACTED]

14 January 2022

Dear Councillor,

South Staffordshire Council Gypsy and Traveller pitch provision

I'm writing to you in connection with South Staffordshire's recent 2021 Local Plan Review [Preferred Options](#) consultation. As you may have seen in the document itself the District Council is currently unable to meet its Gypsy and Traveller pitch needs identified through our [Gypsy and Traveller Accommodation Assessment \(GTAA\) 2021](#). The GTAA 2021 identifies that Gypsy and Traveller families within the District generate a need for 72 pitches within the 5 year period and 121 pitches over the 15 year period.

In tandem with our GTAA we have prepared a separate [Pitch Deliverability Study \(PDS\) 2021](#). This study was also undertaken by ORS and assessed the deliverability of all site options that had been suggested to us, including an assessment on the planning constraints of the site and an analysis of sites capacity to accommodate new pitches. Following this analysis, the PDS 2021 concluded that South Staffordshire is only able to accommodate 42 additional pitches through expanded or intensified existing sites. All of these pitches are within the Green Belt and reflect the District's attempts to maximise all suitable and deliverable Green Belt sites available to meet identified family needs. Policy SA6 of the 2021 Preferred Options consultation proposes to allocate all of these pitch options, but despite this the Council will still be unable to meet the high need figures given in the GTAA 2021, either in the 5 or 15 year period.

Given what appears to be an acute unmet need for the Gypsy and Traveller pitches to meet family needs, the Council has also examined its own land holdings to see if there is potential for a new public site to be created within the District, which could then be controlled to ensure it supplied pitches to the Gypsy and Traveller families which generate the District's pitch needs. The summary results of this work are set out in the [Gypsy and Traveller Public Sites Search November 2021](#). Despite reviewing all of the Council's own landholdings, all appear to have significant constraints that would prevent them from being delivered, such as open space or sports facilities which have not been identified as suitable for disposal, environmental





designations (e.g. Local Nature Reserves) or sites which are permitted/in use as other important functions (e.g. crematoria or employment land).

Given the need to plan for our Gypsy and Traveller pitch needs, **we are therefore seeking your assistance as a Duty to Co-operate body¹ to meet these unmet pitch needs. Specifically, we need to understand if there are options to either accommodate some or all of these unmet needs on existing public sites within your area, or whether new public sites could be created on available land in your area to address this cross-boundary issue.** If you are unable to assist the District in meeting these unmet needs on public sites we would appreciate a justified explanation of why this is not the case and the site typologies you have explored before reaching this conclusion, so that we can be sure that a consistent approach is being taken.

Given the pressing need to address this matter prior to our next local plan consultation, **we would appreciate a response to this letter no later than 25th February 2022.** If you wish to clarify any matters relating to this letter then please contact [REDACTED]
[REDACTED]

Yours faithfully,

[REDACTED]

[REDACTED]
Cabinet Member for Planning and Business Enterprise

¹ This letter has been sent to all Greater Birmingham Housing Market Area authorities and other local authorities that adjoin South Staffordshire. This recognises the functional housing market area geography already established over this area and the need to work with other adjoining local authorities prior to delivering otherwise inappropriate development within the District's Green Belt. As a key duty to co-operate body and public landowner Staffordshire County Council have also been copied into this correspondence.



Sent via email

20 October 2022

Dear [REDACTED]

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter of 14 January 2022 concerning the above. This letter represents the response of the four Black Country authorities to that letter.

The 2016 Gypsy and Traveller Accommodation Assessment set out a level of need for new pitches in the Black Country in excess of current supply on identified sites. This Assessment is currently being updated and early indications are that this situation will not change.

No additional sites have been put forward to meet local need for new pitches through the draft Black Country Plan consultation, previous call for sites or site identification work.

Therefore, the Black Country authorities are unlikely to be able to meet pitch needs arising in neighbouring authorities, including South Staffordshire, through the Black Country Plan review. This position will be confirmed as the work outlined above progresses.

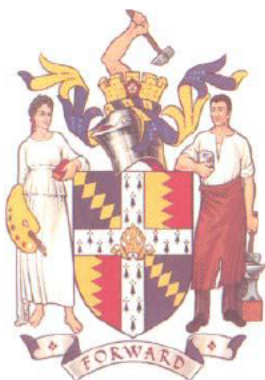
Notwithstanding the above, we remain committed to cooperation on issues of mutual / cross-boundary interest. We welcome the opportunity to continue to work with South Staffordshire District Council in a positive and constructive manner through the preparation of the Local Plan Review. This will include involvement in the preparation of Statements of Common Grounds to support both the South Staffordshire Local Plan and the Black Country Plan, at an appropriate stage.

We trust you find these comments helpful and look forward to further discussions with you.

If you would like to discuss our response please get in touch.

Yours sincerely

[REDACTED]
Lead Planning Manager (Sub-Regional Strategy)
City Planning
City of Wolverhampton Council
Email: [REDACTED]
Tel: [REDACTED]



[REDACTED]
LEADER OF THE COUNCIL
THE COUNCIL HOUSE
VICTORIA SQUARE
BIRMINGHAM
B1 1BB

[REDACTED]
Email: [REDACTED]

Our Ref: IW/1530tr

23 February 2022

SENT VIA E-MAIL ONLY TO: [REDACTED]

FAO: [REDACTED]
Cabinet Member for Planning and Business Enterprise

Dear Councillor [REDACTED]

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 seeking assistance to help meet unmet Gypsy and Traveller pitch needs in South Staffs as part of your 2021 Local Plan Review.

Birmingham Development Plan (2020-2042)

As you may be aware, Birmingham City Council itself has recently commenced an update of the Birmingham Development Plan as well as updating the evidence base that underpinned the existing Plan. As part of that evidence base, the needs of Gypsies and Travellers is being considered as part of the overall need for housing across the City.

To this effect, evidence has recently been commissioned to carry out a Housing and Employment Development Needs Assessment (HEDNA) as well as a Housing and Employment Land Availability Assessment (HELAA) and urban capacity work. The HEDNA, as part of its remit, has undertaken an estimate of Gypsy and Traveller requirements across the City based on the most recent Gypsy and Traveller Needs Assessment (GTAA) which was completed in February 2019. On this basis, the HEDNA estimates that the projected need for Gypsy and Traveller pitches for the new plan period up to 2042 would be 30 permanent pitches. This figure will be verified though a more detailed needs assessment to be carried out in the near future.

Since the 2019 GTAA was carried out, site searches have been regularly undertaken to identify suitable sites to accommodate the projected shortfall in gypsy and traveller pitches in Birmingham. Unfortunately, such sites have yet to be identified and this is compounded by the fact that the vast majority of potential sites have also been earmarked for other housing types due to a significant shortfall in housing need across the whole of Birmingham.

The shortfall in general housing need was first established when the Birmingham Development Plan was adopted confirming a shortfall of 37,900 homes primarily to be met by other authorities in the Greater Birmingham and Black Country Housing Market Area. Given that recent changes to the methodology for housing need could result in significant increases in Birmingham's housing requirement, along with the fact that Birmingham has always been a net exporter of housing for a number of decades, it is envisaged that significant housing shortfalls will continue to be experienced in the City once all of the latest evidence is established and applied to a new timeframe for the new Birmingham Plan up to 2042. It is therefore anticipated that the new Birmingham Plan will also identify significant shortfalls in the capacity to accommodate its general housing need.


Meeting Unmet Gypsy and Traveller Pitch Needs in South Staffs

Given that Birmingham has an unmet housing need in its current Plan (BDP) and that early evidence strongly suggests that this will continue, or be further exacerbated in the new Birmingham Plan, the City is likely to continue facing capacity issues over the new plan period. This situation will make it challenging to find appropriate sites for Gypsy and Traveller provision to meet Birmingham's own needs, notwithstanding the needs of neighbouring local authorities, given the likely pressures to find sites for all housing needs across the City. For these reasons, it is therefore unlikely that Birmingham will be able to assist in meeting any unmet Gypsy and Traveller pitch needs in South Staffs.

Birmingham City Council has been instrumental in ensuring that the 14 local authorities that make up the Greater Birmingham and Black Country Housing Market Area (HMA), which includes South Staffs, continue to work together to ensure that strategic plan requirements are met. Although, on this occasion Birmingham is unlikely to be able to assist, the City Council is still committed to continuing to work with South Staffs District Council, alongside other local authorities making up the HMA, to ensure that strategic issues can be addressed as much as possible.

In the meantime, if you require any other information or input from Birmingham City Council in support of your approach to the Local Plan Review, please do not hesitate to contact us.

Yours sincerely


Leader of Birmingham City Council

Bromsgrove District Council

Parkside, Market Street, Bromsgrove,
Worcestershire, B61 8DA

tel: 01527 881288



Bromsgrove
District Council

www.bromsgrove.gov.uk

██████████
South Staffordshire Council

██████████
Lead Planning Manager
Strategic Planning

25th February 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Dear Councillor ██████████

I write in response to your letter dated 14th January 2022 regarding gypsy and traveller pitch provision in South Staffordshire. In considering the request in your letter, we note the findings of both the 2021 South Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA) and Pitch Deliverability Study. Please note that this letter represents the views of officers only at this stage and are not binding on the Council.

Bromsgrove District Council is in the process of finalising its own GTAA. Draft findings indicate that there is a need for a further 11 traveller pitches and 3 travelling showperson plots to be provided within the Bromsgrove District Plan Review period to 2040. Within the district there is currently only one publicly owned site comprising of 23 pitches. This site is at capacity and there is no scope for this to be extended. All other sites are in private ownership and provide for a maximum of 3 pitches each.

Given the Green Belt designation covering the majority of Bromsgrove District, the Council does not have an extensive land portfolio in order to assist in meeting our own needs or those of other authorities.


The GTAA consultants were also tasked to look at a variety of sources to find potential sites in the District where any future need identified through the assessment could be accommodated. To date, this process has not resulted in any sites being identified. Unless some or all of our need can be met by one of our neighbouring authorities through the Duty to Cooperate, we are in the position where it is likely we will have to release land from the Green Belt to allocate sites in private ownership for traveller provision. Given the need to evidence and justify exceptional circumstances in order to alter Green Belt boundaries (2021 NPPF - Para 140 and 2015 PPTS – Policy E), we will first focus on demonstrating exceptional circumstances in order to meet our own locally derived needs for traveller pitches and travelling showperson plots.

I note that para 7.26 of the South Staffordshire GTAA concludes that net pitch requirements are driven by locally identifiable need (and by inference not in-migration). There is also no reference to the movement patterns of travellers residing in South Staffordshire to suggest there is a strong connection with Bromsgrove District, and this was not found in our own GTAA either. We would therefore also question the evidence for and sustainability of providing pitches in Bromsgrove District to meet locally arising needs.

Therefore we must unfortunately conclude in this instance that we are unable to assist South Staffordshire Council in meeting your unmet need for gypsy and traveller provision. However we look forward to engaging with you on other Duty to Cooperate matters as both of our plans progress.

Yours sincerely,




Strategic Planning and Conservation Manager
Bromsgrove District Council

22 February 2022

Apologies for the delay in responding.

We published a Gypsy and Traveller Accommodation Assessment in 2019 that identified an 'Area of Search' based on existing provision and known travelling corridors. This area included the majority of existing sites and identified need. Interviews carried out showed a clear preference for sites on or near to existing sites.

The Draft Site Selection Methodology is contained within the May 2019 Local Plan Issues and Options Consultation, Section 5 from page 120.

We are progressing the next stage of the Local Plan review and more information will be available in due course but I am not able to share anything further at this time. I will be happy to revisit this in the very near future.

Kind regards



Interim Planning Services Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
01543 464326 | [REDACTED] | www.cannockchasedc.gov.uk

Your ref
Our ref SSCGTPP
Ask for [REDACTED]
Email [REDACTED]



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YU

Strategic Planning Team
South Staffordshire Council
Wolverhampton Road
Codsall
South Staffordshire
WV8 1PX

Direct Line 01543 308147
Customer Services 01543 308000

03 February 2022

Dear [REDACTED]

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 regarding Gypsy and Traveller pitch provision in South Staffordshire in connection with your Local Plan and its recent Preferred Options consultation. As you are aware Lichfield District Council provided formal representation to this consultation on a range of matters including housing and employment need. Lichfield District Council welcomes the further opportunity to provide comments on the South Staffordshire Local Plan in respect of Gypsy and Traveller pitch provision. Lichfield District Council welcomes the continuing, positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the authority's respective local plans progress.

Lichfield District Council notes that South Staffordshire Council has identified a need of 121 pitches through its plan making process and associated evidence base and that to date sufficient sites to meet all of this need has not been identified. As such South Staffordshire Council have contacted authorities to ascertain if neighbouring authorities can assist in meeting this unmet need.

Lichfield District Council are also in the position that it has not been able to identify sufficient sites to meet its own Gypsy and Traveller pitch requirements within its adopted Local Plan nor in the review of its Local Plan. The adopted Local Plan identified a need for 14 residential pitches and 5 transit pitches within the district to 2029. The Council was not able to identify sufficient sites to meet this need.

In support of the review of the Lichfield Local Plan (known as the Local Plan 2040) Lichfield District Council undertook a [Gypsy and Traveller Accommodation Assessment](#) (GTAA) published in November 2019. This identified a seven residential pitches by to 2040 with four of these to be needed by 2024. This need was expressed within Local Plan 2040 publication document which was consulted upon during summer 2021. The document acknowledges that Lichfield District Council is currently unable to identify sufficient sites to meet its own Gypsy and Traveller site requirements.



The Council also prepared a [Gypsy and Traveller site paper](#) to consider the potential supply of sites to meet gypsy and traveller needs. The study concluded that there were insufficient deliverable sites to meet identified needs at the time it was undertaken. Since the time of the study no further sites for potential gypsy and traveller accommodation have been promoted or identified through the plan-making process.

Further to this Lichfield District Council wrote to neighbouring authorities, including South Staffordshire Council in 2019 to ascertain if authorities were able to assist Lichfield District Council in meeting its unmet need in relation to accommodation for Gypsies and Travellers. South Staffordshire Council confirmed they were unable to assist in meeting this unmet need.

As such, and as is evidenced by the above chronology, Lichfield District Council is not able to assist South Staffordshire Council in meeting its unmet Gypsy and Traveller Pitch need.

Lichfield District Council welcomes continuing a positive dialogue with South Staffordshire Council through the Duty to Co-operate process as the South Staffordshire Local Plan progresses.

Yours faithfully

[Redacted]

[Redacted]

Spatial Policy and Delivery Manager

[Redacted]
[Redacted]



Town Hall, Walter Stranz Square,
Redditch, Worcestershire B98 8AH

tel: (01527) 64252

fax: (01527) 65216



[REDACTED]
South Staffordshire Council

[REDACTED]
Lead Planning Manager
Strategic Planning

21st February 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Dear [REDACTED]

I write in response to your letter dated 14th January 2022 regarding Gypsy and Traveller pitch provision in South Staffordshire. We have considered the request in your letter and have noted the findings of both the 2021 South Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA) and Pitch Deliverability Study. Please note that the comments set out in this letter represent Officer views only and should be regarded as non-binding on the Council.

Redditch Borough Council has recently commissioned consultants Lambert Smith Hampton to undertake a HEDNA to establish the housing needs for the Borough to inform the Local Plan review. This has also included a high-level consideration of the need for new pitch provision for Gypsies and Travellers. The draft report has established that given the very small gypsy and traveller population in Redditch, it is recommended that there is a requirement for zero permanent pitches over the assessment period and a need for 2 temporary pitches.

We note that Section 5 of the latest GTAA report commissioned by South Staffordshire Council confirms that most of the existing pitches are located in the north of the District including the area near the Cannock border and main highway infrastructure. It also states that most of the need derives from the family growth of the existing population and there are few applications from new families. Furthermore, Paragraph 5.14 suggests that South Staffordshire should prioritise creating small family sites for families local to the area.

The evidence suggests that pitch requirements within South Staffordshire are therefore very localised to the area and not driven by in migration. It also does not include any evidence on the movement patterns of travellers who reside in the area to suggest that there is a strong connection with Redditch Borough.

Paragraph 13h of the National Planning Policy on Gypsy and Traveller Pitch Provision states that pitch provision should reflect the extent to which traditional lifestyles (whereby some travellers

live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

Redditch Borough Council therefore considers that there is insufficient evidence to conclude that we should be enabled to assist South Staffordshire Council in meeting their unmet need for gypsy and traveller provision. This would not provide a sustainable solution to meeting the specific needs of the Gypsy and Traveller population within the South Staffordshire area, who currently have no evidenced links with Redditch Borough.

Yours sincerely,

A black rectangular box used to redact a signature.

Head of Planning, Regeneration and Leisure Services

Bromsgrove District and Redditch Borough Councils

██████████
Strategic Planning Team Manager
South Staffordshire Council

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

3 March 2022

Dear ██████████

South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your Duty to Cooperate communication of 14th January 2022 which highlights that your Gypsy and Traveller Accommodation Assessment 2021 evidence and supporting work has identified likely insufficient capacity to meet Gypsy and traveller pitch needs within South Staffordshire District over your proposed Local Plan period. I apologise for the delay in response. For clarity, this response has been agreed by Shropshire Council's Deputy Leader and Portfolio Holder for Economic Growth, Regeneration & Planning, ██████████

We note that you are formally exploring the scope for Shropshire Council, as an adjoining local authority, to help in addressing the forecast unmet Gypsy and travellers pitch need which has been identified by your evidence. You ask specifically whether Shropshire could, *'accommodate some or all of these unmet needs on existing public sites within your area, or whether new public sites could be created on available land in your area to address this cross-boundary issue'*.

As you are aware the review of the Local Plan in Shropshire is at an advanced stage of preparation with the Draft Shropshire Local Plan 2016- 2038 having been submitted for examination on the 3 September 2021. Planning Inspectors have been appointed and we are currently waiting for confirmation of hearing dates.

As part of this process Shropshire Council and South Staffordshire District Council have engaged constructively via the Duty to Cooperate, captured within an agreed Statement of Common Ground (SoCG) between the authorities dated 26th May 2021.

The SoCG between Shropshire Council and South Staffordshire District Council sets out Shropshire Council's position regarding Gypsy and Traveller matters, summarising the outcome of the Gypsy and Traveller Accommodation Assessment (GTAA) update 2019.

This update evidence concluded that there was no current strategic requirement for general pitch allocation, although a need to address requirements for travelling showpeople and potential for public transit capacity to support private provision was identified.

The GTAA update took into account the extended Plan period of 2016 to 2038 and was informed by detailed site management data, supplied by the Councils Gypsy Liaison team who manage Council sites, together with a range of other information. This approach to the update of the GTAA has allowed the Council to re-examine findings within the earlier GTAA and confirm assumptions, remained appropriate. It is therefore considered to be a proportionate and robust evidence base document.


As well as evidence review, Shropshire Council had carried out a 'Call for Gypsy and Traveller sites' alongside the 'Regulation 18' Plan making consultation on 'Preferred Sites' (29 November 2018 - 08 February 2019) for potential locations that could be available to meet the potential accommodation needs of Gypsies and Travellers. There was limited response. There have also been reviews of Council land, in particular with regard to specific identified Travelling Showpeople needs and a potential transit site. Subsequently a permanent site for Travelling Showpeople in Oswestry was granted planning permission in May 2020 and therefore no allocation is proposed for this purpose in the Draft Local Plan.

Significant work has been carried out by the Council in expanding and improving its existing sites and facilities in order to deliver a better offer of accommodation for the Gypsy and Traveller community in Shropshire. This has included redevelopment of sites to make additional pitch provision as well as the aforementioned provision for Travelling Showpeople. The Council as a landowner is continuing to consider requirements for additional and enhanced pitch provision. Shropshire Council does not however manage any existing Gypsy and Traveller sites in reasonable proximity to South Staffordshire, with its sites being located in Craven Arms and near Oswestry, Shrewsbury and Whitchurch. The Council is also mindful of the impact of Green Belt designation in considering sites for development, as well as the influence of main gypsy and traveller transit routes and the concentration of gypsy and traveller sites in northern Shropshire locations.

On the basis of the above there is a notable mismatch in both the timing of our local plan preparation cycles and the geography of Shropshire Council's gypsy and traveller provision and main areas of demand that would not facilitate provision in Shropshire to meet need identified for South Staffordshire District. Thus, with these constraints in mind, we consider that we are not in a position to offer any cross boundary assistance at this time.

I hope that the information set out above sufficiently addresses the questions raised in your correspondence but please do contact me to discuss this matter if required. We look forward to continuing constructive conversations to discuss strategic cross boundary issues as part of your continued plan making process.

Yours sincerely,


Planning Policy and Strategy Manager
Shropshire Council

[REDACTED]
Cabinet Member for Planning & Business Enterprise
South Staffordshire Council
Council Offices
CODSALL
South Staffordshire
WV8 1PX

CONTACT [REDACTED]
DIRECT DIAL [REDACTED]
FAX [REDACTED]
EMAIL [REDACTED]
OUR REF [REDACTED]
YOUR REF [REDACTED]
DATE 8 February 2022

By e-mail

Dear Councillor [REDACTED]

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14 January 2022 to my Cabinet Member, under the Duty to Co-operate, asking about the position of Stafford Borough Council concerning gypsy and travellers. I have been asked to respond on behalf of Cllr Mrs Frances Beatty.

The Plan for Stafford Borough 2011-2031 (adopted in June 2014) includes Policy C6 – Provision for Gypsies, Travellers & Travelling Show-people setting out policy criteria for considering development proposals. Subsequently a Gypsy and Traveller Accommodation Needs Assessment (GTAA) was jointly published with the City of Stoke-on-Trent, Newcastle-under-Lyme Borough and Staffordshire Moorlands, which demonstrated a need for 43 new pitches in Stafford Borough up to 2027. Whilst planning permissions have been granted for new pitches in the Borough, there remains an outstanding requirement for new pitches to meet the identified need.

The Borough Council is progressing with the New Local Plan 2020-2040 to replace the adopted Plan for Stafford Borough and the Part 2 Plan (adopted in January 2017) which will include meeting the future gypsy and traveller needs in our administrative area. This evidence base and call for sites identification process is still on-going, with further information being made available when the Preferred Options consultation is published in June & July 2022. Nevertheless at this stage I can confirm that Stafford Borough Council are not in a position to help the unmet need for new gypsy and traveller pitches in South Staffordshire District Council.

If you have any further queries, please do not hesitate to get back in contact.

Yours sincerely,

[REDACTED]
[REDACTED]
Strategic Planning & Placemaking Manager

2 March 2022

Informal officer response only:

In view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SDC does not consider it appropriate to take unmet needs from South Staffs.

Notwithstanding the above, as you know SDC is keen to investigate existing migration patterns across the region to better understand how needs can be accommodated moving forwards.

Head of Place and Economy
Stratford-on-Avon and Warwick District Councils

Assistant Director – Growth & Regeneration

Please ask for:
Telephone:
E-mail:

Councillor

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council
By email only

27 January 2022

Dear Councillor

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 14th January 2022 concerning the above. I note that your recent Gypsy and Traveller Accommodation Assessment (GTAA) identified a significant need for pitches within both the 5 and 15 year periods and that you have been unable to identify sufficient sites to accommodate the full identified need. I also note your request for assistance in meeting your unmet need on existing public sites or potential new public sites.

Unfortunately there are currently no public sites or pitches within Tamworth Borough and so Tamworth would not be able to accommodate any unmet need through existing sites.

In 2019 the Council, jointly with Lichfield District Council and North Warwickshire Borough Council, commissioned ORS to carry out its own GTAA. The result of the assessment was that there was no identified need for pitches within Tamworth Borough. As a result of this, the Council has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches.

However, Tamworth has recently seen a number of visits from Gypsy and Traveller groups and, as a result, is currently considering its approach, which may involve an assessment of the Council's own landholdings as a source of potentially suitable sites.

Therefore, whilst there may be potential opportunities in the future, at this time Tamworth Borough Council is unfortunately not in a position to be able to offer assistance.

Yours sincerely,

pp.

Councillor
Portfolio Holder for Skills, Planning, Economy & Waste



Wyre Forest District Council

Councillor [REDACTED]
Cabinet Member for Planning and Business Enterprise
South Staffordshire Council
Council Offices
Codsall
South Staffordshire
WV8 1PX

Ref: HD/SFP
Date: 17 March 2022

Dear Councillor [REDACTED]

South Staffordshire Council Gypsy and Traveller Pitch Provision

Thank you for your letter dated 14 January.

Wyre Forest District Council, as a Duty to Cooperate partner, has considered your request for assistance with meeting the unmet need for gypsy pitches in South Staffordshire. Unfortunately, we are not able to assist with this request.

There is only one public gypsy and traveller site in our District on the Sandy Lane Industrial Estate in Stourport-on-Severn. This site has already been redesigned to increase its capacity and there is no further scope for expansion.

The Council undertook its own Gypsy and Traveller accommodation assessment in 2021 and this identified a total need for 35 pitches over the period (2020/21-2035/36), with 13 of the required pitches falling within the definition set out in the Planning Policy for Traveller Sites.

The Council identified the potential to provide 4 more pitches by expansion/intensification of 3 small private existing sites together with the regularisation of an existing site for 4 pitches and one new site at Zortech Avenue, Kidderminster which is now included in the Local Plan. However, there were no other sites identified that could meet any further need.

We received the inspector's final report on the Wyre Forest District Local Plan 2016-2036 on 11 March and it is now too late to consider further changes to it. The site proposed in the plan is in the Council's ownership on the southern edge of Kidderminster. This will entail removing land from the Green Belt. This site, along with the others mentioned above, will

satisfy the plan requirement shown by our GTAA 2020. The site is considered suitable for allocation as it is adjacent to the main employment area and within easy reach by foot of schools, shops, and other facilities and is close to where the majority of our Gypsy and Traveller population are located, which is important for family networks.

Much of Wyre Forest District is also within the West Midlands Green Belt and for this reason we were also constrained in our search for suitable sites to fulfil the pitch requirement.

While your letter mentioned that you had examined sites in the District Council's ownership, you did not provide any information on whether you had examined other potential sites in public ownership (such as land owned by Staffordshire County Council or the NHS) or indeed previously developed land in private ownership and so it isn't clear whether you have also pursued these options.

Yours sincerely,



Councillor [Redacted]
Leader of the Council

Wyre Forest House, Finepoint Way, Kidderminster DY11 7WF



Sent via email
FAO: Cabinet Members for Planning

Please ask for: [REDACTED]

Direct Dial: [REDACTED]
[REDACTED] [REDACTED]

08 August 2022

Dear Councillor,

South Staffordshire Council Gypsy and Traveller pitch provision

Further to my previous letter dated 14 January 2022 (reattached), I'm writing to you in relation to South Staffordshire's emerging Local Plan and specifically our unmet needs for Gypsy and Traveller pitches.

As set out in my previous letter, ORS have prepared a Gypsy and Traveller Accommodation Assessment that has identified a need for 72 pitches within the 5-year period and 121 pitches over the 15-year period. Having then assessed the deliverability of site options to meet the identified family need, it was concluded that South Staffordshire is only able to accommodate 42 additional pitches through expanded or intensified existing sites. Further consideration was given to council landholdings at this time, but our assessment of these concluded that all had significant constraints that would prevent them from being delivered, such as open space or sports facilities. All 42 site options proposed through the Preferred Options consultation are in the Green Belt.

The Council received responses to my letter of 14 January from a total of 13 authorities (some within our Housing Market Area and some from other neighbouring authorities), however none of these responses indicated that pitches could be delivered on an existing public site or that a new public site could be delivered. In summary, responses included the following points:

- Authorities unable to meet their own needs due to lack of suggested sites for traveller pitches through call for sites consultations or other site identification processes
- Site identification process still ongoing so unable to help with unmet needs at this stage
- Land supply constraints including unmet needs for general housing, meaning suitable sites may be earmarked for other housing types due to the significant shortfall
- Existing public site(s) at capacity with no scope to extend
- Questioning whether exporting unmet needs to [REDACTED] MA would be appropriate given the lack of need in our GTAA that is driven by in-migration
- Mismatch in local plan preparation cycles and the geography of existing provision to meet South Staffordshire's unmet needs
- [REDACTED] Green Belt
- [REDACTED] Staffordshire have considered other public sector land (e.g Staffordshire County [REDACTED] land) or privately owned Previously Developed Land (PDL)



Having considered these responses, we have taken further steps [redacted] if additional supply for gypsy and traveller pitches is available and deliverable. Firstly, we contacted all the site promoters for proposed allocations within our emerging plan to enquire if they [redacted] a proportion of their site for a public gypsy and traveller site. However [redacted] of the site [redacted] with confirmation that part of their site would be available for this use.

We are also in the process of undertaking a further assessment of Staffordshire County Council owned farms, all of which are washed over by Green Belt or designated open countryside. This assessment is currently being finalised however early indications suggest that any potentially suitable sites are limited and that a shortfall, even against our five-year requirement of 72 pitches, will remain.

In light of the further steps we have taken, we are now contacting all HMA and neighbouring authorities for an updated position on this issue and to understand if a consistent approach has been taken to explore supply options. Whilst we appreciate that some authorities may have less of a functional relationship with South Staffordshire than others, the purpose of this request is to explore if there is availability within an existing public site, or suitable site options to create a new public site to meet the needs of specific family members with an identified need. We cannot assume that they would be unwilling to relocate to a public site in other authorities if this secured them a permanent pitch, so we must explore this option to export unmet needs further.

We therefore request confirmation of the following:

- 1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?
- 2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
- 3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
- 4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Given the pressing need to address this matter prior to our next local plan consultation, **we would appreciate a response to this letter no later than 2nd September 2022**. If you wish to clarify any matters relating to this letter, then please contact [redacted]

Yours faithfully,

[redacted signature]
[redacted name]

Cabinet Member for Planning and Business Enterprise

South Staffordshire Council • Council Offices • Codsall • South Staffordshire • WV8 1PX

Tel: **(01902) 696000** • Email: **info@sstaffs.gov.uk** • **www.sstaffs.gov.uk**

Twitter: **@south_staffs** • Facebook: **South Staffordshire Council**

Sent via email

████████████████████
Cabinet Member for Planning and Business Enterprise

05 September 2022

Email: ████████████████████

Dear Councillor ██████████

South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 8 August, 2022 further to your previous letter dated 14 January 2022 and our response dated 16 February 2022 concerning assistance to help meet unmet Gypsy and Traveller pitch needs in South Staffs as part of your 2021 Local Plan Review.

Birmingham City Council's previous response concluded that it was unlikely that we would be able to assist in meeting any unmet Gypsy and Traveller pitch needs in South Staffs as part of your Local Plan. This is mainly due to the City Council experiencing significant unmet housing need due to land supply constraints, (including unmet needs for general housing), meaning that potential sites for Gypsy and Traveller pitches to assist South Staffs are likely to be earmarked for other housing types due to the significant shortfall being experienced. Birmingham City Council are currently preparing to replace the Birmingham Development Plan (2017) with a new local plan, the Birmingham Plan, and early evidence gathering suggests that this housing shortfall will, potentially, be at least as large as last time.

In addition, as part of that evidence base, the needs of Gypsies and Travellers is being considered as part of the overall need for housing across the City. As set out previously, early evidence suggests that it is likely that the City Council will need to identify further sites to meet their own needs for Gypsy and Traveller accommodation in addition to the likely significant requirements to meet general housing needs.

In answer to your specific questions, I would therefore confirm the following on behalf of Birmingham City Council;

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

As set out above, evidence work towards the new Birmingham Plan is currently underway and indications are that the City Council will not be able to identify sufficient land to meet its own requirements for general housing need due to significant land supply constraints. It is likely that the City Council will also need to identify further sites to meet its own gypsy and traveller needs in addition to general housing needs and it is therefore unlikely that any plots could be identified to meet the Gypsy and Traveller Needs for South Staffs in addition to those identified to meet Birmingham's likely Gypsy and Traveller needs.

2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Preparation for the new Birmingham Plan is still in its early stages with adoption scheduled for 2026. As part of that process, the City Council will be considering all options for the delivery of Gypsy and Traveller requirements across the City to meet its own needs including site options within the Green Belt if considered appropriate following the gathering of further evidence. This will be carried out during 2023 when the Preferred Options document for the Birmingham Plan is being prepared.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
This is something which the City Council has not yet done. The City Council is looking at site options on publicly owned sites first and foremost, preferably within Council control. If sufficient publicly owned sites cannot be identified, the Council will then consider approaching and engaging with site promoters to see if any further sites can be identified. Again, this is something which will be considered in the lead-up to the publication of the Preferred Options document towards the end of 2023.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?
As set out in the answer to question 3, the City Council have only considered publicly owned sites so far, preferably those within the control of the Council. Further work in identifying such sites is on-going and will continue into the near future in preparation for the Preferred Options document for the new Birmingham Plan.

I trust that this answers the questions raised by you at this stage in relation to Birmingham. As stated in the previous letter, the City Council supports the approach taken by South Staffs Council to your Local Plan Review and is committed to continuing to work with you, alongside other local authorities making up the HMA, to ensure that strategic issues can be addressed as much as possible.

Yours sincerely,




Director - Planning, Transport & Sustainability

Bromsgrove District Council

Parkside, Market Street, Bromsgrove,
Worcestershire, B61 8DA



Bromsgrove
District Council

www.bromsgrove.gov.uk

South Staffordshire Council

Lead Planning Manager
Strategic Planning

1st September 2022

Re: South Staffordshire Council Gypsy and Traveller pitch provision – August 2022

Dear Councillor

I write in response to your letter dated 8th August 2022 regarding unmet needs of Gypsies and Travellers in South Staffordshire. Please note that this letter represents the views of officers only at this stage and are not binding on the Council.

Specifically, your letter asked for confirmation of the four following points:

- 1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?**
As detailed in our response to you in February 2022, there is one public traveller site in Bromsgrove District which has a capacity of 23 pitches. The site is very popular and there are currently no free pitches.
- 2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?**
We are currently continuing to explore options as to how we will meet our own identified need of 11 traveller pitches and 3 travelling showperson plots. As set out in our previous response, given the Green Belt designation covering the vast majority of the District, it is very likely that this need will be accommodated within the Green Belt. We can confirm that we are considering both publicly run and privately run sites.
- 3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?**
At this stage we believe we may be able to accommodate our requirement without approaching privately owned sites. However if our favoured options prove undeliverable, we would consider other options, which could include a publicly run site as part of a wider allocation.
- 4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?**

We can confirm that we have considered all publicly owned land that was either promoted to us through the Call for Sites process or that we were aware of, as possible locations for meeting traveller needs.

I trust this evidences the thorough process that has been taken Bromsgrove District in identifying potential sites for Gypsies and Travellers and demonstrates consistency with your own approach. Furthermore, I hope this letter satisfies the need for further dialogue between our Local Authority areas raised by [REDACTED] in recent correspondence regarding the Bromsgrove District Plan Review (Duty to Cooperate letter dated 29 July 2022), specifically in relation to the Question 3 response.

Yours sincerely,

A large black rectangular redaction box covering the signature of the Strategic Planning and Conservation Manager.

[REDACTED]
Strategic Planning and Conservation Manager
Bromsgrove District Council

1 September 2022

Further to your letter of 8th August I can set out our position in relation to the 4 questions that are raised at the bottom of the letter.

1. There are no public sites within the District and therefore no plots available to meet our needs or unmet needs from elsewhere on such sites.
2. Green Belt sites have been considered for new gypsy and traveller provision although a new publicly run site has not been an option that has been considered. This is not something that we intend to explore further.
3. No engagement has taken place with site owners in respect of potential to allocate part of their site for a publicly run site. Again, there are no plans to investigate this further.
4. Publicly owned sites have been considered for potential new sites but these options were very limited when considered against our assessment criteria.

Please come back to me should you need any further clarification.



Planning Services Manager
Cannock Chase Council | Civic Centre | Beecroft Road | Cannock | WS11 1BG
01543 464326 | | www.cannockchasedc.gov.uk

14 September 2022

I can advise that in the run up to our submission we re-contacted other authorities to establish if any of them could provide sites as we appear to have no additional sites available to meet our current more modest need.

It may be the case looking at the initial questions from the Planning Inspectorate in response to the Local Plan submission that there may be a need to revisit site assessments done previously to see if any further capacity can be found, but it is not possible at this stage to advise on that point.

Spatial Policy & Delivery Manager
Lichfield District Council
District Council House, Frog Lane, Lichfield, Staffordshire WS13 6YZ



FAO

██████████ Lead Planning Manager
██████████ Strategic Planning Team Manager

Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
Shropshire SY2 6ND

Date: 7 October 2022

My Ref:

Your Ref

Dear ██████████

South Staffordshire Council Gypsy and Traveller pitch provision

I hope you are well. This letter is in response to the letter from ██████████ on 8th August 2022 addressed to our Portfolio holder for Planning, and addressing the issue of Gypsy and Traveller accommodation.

Firstly, can I apologise for the delay in responding to this letter. As a result of recent changes to our Cabinet, Planning related services, including those relating to Local Plan issues, now comes under the remit of Cllr ██████████. I can confirm that Cllr ██████████ has agreed this response.

As indicated in your letter, Shropshire Council responded to your earlier Duty to Cooperate correspondence on this issue on 3rd March 2022. We concluded that Shropshire would not be in a position to accommodate any identified unmet Gypsy and Traveller accommodation needs from South Staffordshire, due to a notable mismatch in both timing of our Local Plan preparation cycles and having regard to the geography of Shropshire's gypsy and traveller provision and main areas of demand. It is considered these conclusions remain valid, and therefore the Council's position regarding any unmet need has not changed.

Notwithstanding, we recognise the importance of continuing to engage constructively in relevant cross boundary discussions and acknowledge your 8th August letter raises further specific questions. Our response to these is captured below:

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

Clearly the level of occupancy on plots is a fluid position. Currently, whilst there are vacant plots, these are factored into the Council's evidence as turnover based supply based upon the identified needs of Shropshire. As such we do not consider there are any available plots on public sector sites that are capable of meeting any unmet needs.



2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

In response to specific evidence contained in our Gypsy and Traveller Accommodation Assessment (GTAA), the Council is considering options for additional transit site provision, with a planning application on Council land expected to be submitted shortly. In addition, provision for a specific travelling showpersons need has been met. Neither of these sites are located in the Green Belt.

Significant work has been carried out by the Council in expanding and improving its existing sites and facilities in order to deliver a better offer of accommodation for the [REDACTED] Traveller community. This has included redevelopment of sites to make additional pitch provision at the Council's sites in both Park Hall and Craven Arms (Long Lane); improvements at the sites in Craven Arms (Long Lane) and Higher Heath (Manor House Lane); as well as the aforementioned provision for Travelling Showpeople.

As such no new publicly owned run sites are being considered at this stage.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

The Council's evidence, contained in the GTAA, has not identified the need for the provision of additional gypsy and traveller accommodation, aside from specific provision for a new transit site and for the accommodation of a specific travelling showperson's need, as outlined in response to Q2. As such the Council has not engaged in specific discussions with site promoters of proposed allocations in the emerging Local Plan to explore the option along the lines described, and this is something we do not intend to do.


4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

Shropshire Council issued a 'Call for sites' to identify potential locations that could be available to meet the potential accommodation needs of Gypsies and Travellers alongside the 'Regulation 18' Plan-Making Consultation on 'Preferred Sites' (29 November 2018 - 08 February 2019). However, as both the 2017 and 2019 iterations of the GTAA arrived at similar conclusions, it has been concluded there was no strategic need for additional general sites to be allocated. Thus, sites promoted through the 'call for sites' process and other avenues for bringing forward general sites for allocation were not progressed as part of the Local Plan Review process.



I hope that the information set out above sufficiently addresses the questions raised in your correspondence but please do contact me to discuss this matter if required. We look forward to continuing constructive conversations to discuss strategic cross boundary issues as part of your continued plan making process.

Yours sincerely,


Planning Policy and Strategy Manager
Shropshire Council



██████████
Cabinet Member for Planning & Business Enterprise
South Staffordshire Council
Council Offices
CODSALL
South Staffordshire
WV8 1PX

CONTACT ██████████
DIRECT DIAL ██████████
FAX
EMAIL ██████████
OUR REF AY/766
YOUR REF
DATE 19 August 2022

By e-mail

Dear Councillor ██████████

Re: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 8 August 2022 directed to my Cabinet Member, under the Duty to Co-operate, asking about the position of Stafford Borough Council concerning gypsy and travellers. I have been asked to respond on behalf of Cllr ██████████

The Plan for Stafford Borough 2011-2031 (adopted in June 2014) includes Policy C6 – Provision for Gypsies, Travellers & Travelling Show-people setting out policy criteria for considering development proposals. Subsequently a Gypsy and Traveller Accommodation Needs Assessment (GTAA) was jointly published with the City of Stoke-on-Trent, Newcastle-under-Lyme Borough and Staffordshire Moorlands, which demonstrated a need for 43 new pitches in Stafford Borough up to 2027. Whilst planning permissions have been granted for new pitches in the Borough, there remains an outstanding requirement for new pitches to meet the identified need.

The Borough Council is progressing with the New Local Plan 2020-2040 to replace the adopted Plan for Stafford Borough and the Part 2 Plan (adopted in January 2017) which will include meeting the future gypsy and traveller needs in our administrative area. In March 2022 the Borough Council published an updated Gypsy and Traveller Accommodation Assessment (GTAA) which demonstrated a Planning Policy for Traveller Sites (PPTS) need for 22 new pitches in Stafford Borough up to 2040. The call for sites identification process is still on-going, with relevant policy context being made available when the Preferred Options consultation takes place in October to December 2022. Nevertheless at this stage I can confirm that Stafford Borough Council are not in a position to help the unmet need for new gypsy and traveller pitches in South Staffordshire District Council.

Turning to your specific questions I can confirm that all of the plots on existing public sites are occupied and therefore are unable to support South Staffordshire's unmet need. In addition we hold a waiting list for plots for when any become available. This unfortunately is rare as we have recently had to reduce the number of pitches during a refurbishment and most of the residents on the site have lived there for long periods of time and are not considering moving.

Based on current market conditions and available resources for effective delivery within Stafford Borough all potential site delivery options, both public and private, have been considered through submissions from landowners / developers. At this stage the Borough Council are not aware of any publicly owned land which is available to deliver new gypsy sites despite reviewing Stafford Borough Council's land and working with Staffordshire County Council over a number of years in an attempt to identify new gypsy sites.

If you have any further queries, please do not hesitate to get back in contact.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Strategic Planning & Placemaking Manager

14 September 2022

I apologise for the delay in responding to the letter from Cllr regarding Gypsies and Travellers dated 8th August 2022.

Planning for Gypsies and Travellers is being dealt with through the preparation of the South Warwickshire Local Plan and we have commissioned a GTAA to help inform that process. No decisions have yet been made about how needs will be met so I cannot provide a response to questions 2, 3 and 4.

In respect of question 1, I respectfully reiterate the officer response to your previous letter:

In view of the weak links between the two authorities and the likelihood that any provision made in Stratford-on-Avon would not in reality meet actual needs arising in South Staffs, SDC does not consider it appropriate to take unmet needs from South Staffs. Notwithstanding the above, as you know SDC is keen to investigate existing migration patterns across the region to better understand how needs can be accommodated moving forwards.

If you wanted to progress any regional technical work to your timescales, I would be keen to support you in that activity.

I trust that this response is helpful and I apologise again for missing your September deadline.

Regards,

Head of Development
Stratford-on-Avon District Council

[REDACTED]
Assistant Director – Growth & Regeneration

[REDACTED]
[REDACTED]
Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council
By email only

21 September 2022

Dear [REDACTED]

RE: South Staffordshire Council Gypsy and Traveller pitch provision

Thank you for your letter dated 08 August 2022 concerning the above. I have provided answers to the specific questions posed below.

1) Are there any plots available on existing public sites within your area that are available for contributing towards meeting our unmet needs?

There are no existing public sites within Tamworth, so we are currently unable to contribute any pitches from that source.

2) Can you confirm if you have considered site options for a new publicly run site, including on site options within the Green Belt? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

As you will recall from our response to your letter of 14 January, in 2019 the Council, jointly with Lichfield District Council and North Warwickshire Borough Council, commissioned ORS to carry out its own Gypsy and Traveller Accommodation Assessment (GTAA). The result of the assessment was that there was no identified need for pitches within Tamworth Borough. As a result of this, the Council has not currently identified any potential sites within the Borough that would be suitable for accommodating pitches.

3) Can you confirm if you have engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available for a publicly run site? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

For the reasons set out above, the Council has not engaged with site promoters/proposed allocation sites to explore if they are willing to make part of their site available at this time.

4) Can you confirm if you have considered publicly owned land as part of your site identification process? If no, is this something you intend to do, and if so, can you provide indicative timescales for this?

For the reasons set out above, the Council has not at this time considered publicly owned land for the provision of Gypsy and Traveller pitches.

The Council is currently at the beginning of the process of developing a new local plan for Tamworth, and part of this will likely involve an update to the 2019 GTAA. However, given the lack of identified need for pitches at this time, we are unfortunately still not in a position to be able to offer assistance with your unmet need.

Yours sincerely,

A black rectangular box redacting the signature and name of the official.

Portfolio Holder for Skills, Planning, Economy & Waste

12 September 2022

Thank you for consulting Wyre Forest District Council and I apologise for the delay in responding.

The Wyre Forest District Local Plan (2016-2036) was adopted on 26th April 2022. It allocates 2 new sites (one already in use) and one new site on land in District Council ownership which has been removed from the Green Belt through the Local Plan process. This requirement comes from the 2020 Wyre Forest District Gypsy and Traveller Accommodation Assessment. As set out in Policy SP.14 at table 7.0.4, an additional 4 plots have also been proposed through expansion/intensification of existing sites. The new allocated site has the potential to meet our outstanding requirement for 13 pitches as shown in Table 7.0.4.

Thus, I can confirm that:

- 1) There are no plots available on existing public sites within Wyre Forest District that are available for contributing towards meeting the unmet needs of South Staffordshire.
- 2) We have no plans for a further publicly run site within Wyre Forest District. There is currently one site managed by Worcestershire County Council.
- 3) The allocation of gypsy pitches on the proposed allocations was discussed through the Local Plan Inquiry and was not considered feasible
- 4) The site which we have allocated for pitches is in public ownership and will be able to meet the requirement for pitches in Wyre Forest. It is a tightly constrained site which will need to be carefully designed to minimise any adverse impact on the neighbouring nature reserve.

Principal Planning Policy Officer
Wyre Forest District Council

Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF

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Wyre Forest
District Council

Visit the Wyre Forest District Council [website](#)

Appendix C: Email to site promoters of housing site allocations 18.02.22 and responses

18 February 2022

Email to Site Promoters

Good Afternoon,

As you will be aware, a housing site you are promoting was identified as a preferred site in our [Preferred Options](#) document, which we consulted on in late 2021. We are now in the process of considering whether there is a prospect for part of our proposed residential allocations to meet our outstanding unmet need for gypsy and traveller pitches.

Our Preferred Options proposed to allocate new traveller pitches following a full consideration of the suitability to extend/expand existing traveller sites through our [Pitch Deliverability Study \(PDS\) 2021](#). The PDS identified sites for expansion to accommodate 40 new traveller pitches all in the Green Belt which we proposed for allocation through the Preferred Options, however this is against a need of 72 pitches over the next 5 years and a need for 121 pitches over the 15 year plan period, as determined through our [Gypsy and Traveller Accommodation Assessment \(2021\)](#). The need identified was to meet the current and/or emerging needs of existing families within the District.

Through our Preferred Options consultation we also asked for site suggestions for new traveller sites to be put forward for consideration, however unfortunately this did not result in any new site suggestions being put forward; and neither did a [review of Council owned land](#).

We are also currently exploring if there is an option for some of our neighbouring authorities to meet some of our unmet need for pitches through agreement under the Duty to Cooperate. However, in light of the above, **we are asking you to confirm if you would in principle be willing to transfer a proportion of your site to be run by either the Council or a Registered Provider as a public gypsy and traveller site.**

Please could I ask that you confirm your position on this matter to me no later than 18th March 2022, but if you have any queries in the meantime, please get in touch.

Strategic Planning Team Manager
Strategic Planning
South Staffordshire Council

18 February 2022

Advance Planning

You should note that I also act for [redacted] and I have submitted representations in respect of the land off Saredon Road, Cheslyn Hay (119a and 119b), although Cameron Homes have also submitted reps as a housebuilder. For the record, this land is not available as Gypsy site.

With regards to Site 139 at Pool View, my client has been busy collating various reports to support a full planning application for residential development, that will be submitted in conjunction with a housebuilder.

So I can confirm that the site is not available as a Gypsy site. We intend to promote residential development and I fully expect a planning application will be submitted sometime this year.

18 March 2022

Avison Young

My client has given consideration to the email below and is unable to progress a conversation with South Staffs Council on gypsy and traveller pitches in relation to its land at White Hill, Kinver.

Whilst the land is being promoted by Trebor it is owned by Enville Estates. The Estate own land within Dudley MBC that may have potential for gypsy/ traveller pitches. Land at Caledonia/Bagleys Road is available, just under 6 acres and which has previously experienced trespass and fly grazing. A location plan is attached. The site has a Linear Open Space and SINC designations and also has TPOs. I believe that adjacent land is subject to a current planning application for housing (ref. P21/0734).

Whilst not in South Staffs, it is reasonably close and might be suitable under the Duty to Co-Operate.

If this is of interest as an opportunity for exploration under the Duty to Cooperate please do get in touch as to how this might be taken forward.

18 February 2022

Bloor Homes

I can confirm that no site or part thereof that Bloor Homes Ltd is promoting, either proposed for allocation or otherwise, is available for Gypsy or Traveller Pitches.

Planning Director

Bloor Homes Midlands

23 February 2022

DBA Estates

Further to your email, I assume that you are referring to the Loades Business Park site in Great Wyrley.

However, having consulted with my client, I have to advise you that they would not be willing to see / transfer part of their site for use as a gypsy and traveller site. In addition, given the site's surroundings, I would expect that such a proposal would generate significant local opposition.

Planning & Development Manager



28 February 2022

Gladman

Thanks for your email.

With reference to Site 036c (Land at Weeping Cross) being promoted by Gladman Developments Ltd, I confirm we are **not offering** any part of the site to be provided for gypsy and traveller pitches.

The site is promoted solely for residential dwellings.

Planning Director



21 February 2022

Lichfields

I write to confirm that Taylor Wimpey would **not** be willing to transfer a proportion of its site for this purpose. This position applies to the draft allocation at Poolhouse Road, Wombourne (Site 285) and land at Clent View Road, Stourbridge that Lichfields is promoting on behalf of Taylor Wimpey through the emerging Local Plan process.

Kind regards

Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

28 February 2022

Pegasus Group

Thank you for approaching us on this matter, which Miller are keen to understand better and assist with if possible, as we understand Gypsy and Traveller accommodation is a hugely challenging element of development planning work.

That said, we do not feel that the current proposed residential allocation at 'land off Holly Lane' (Ref: 536a) would be appropriate or practical to meet any of this unmet G&T need. This is largely due to the existing expectation for the site to deliver an element of on-site specialist elderly provision and a drop-off parking area for the school alongside regular market and affordable housing, on a relatively compact 4 Ha site. As such introducing a further land use on this site would be likely to generate operational conflicts and viability issues.

What's more, as emphasised in our representations to date, it is our strong view that the proposed plan will not meet regular housing needs in full, and that additional land will need to be identified to achieve this, including within Great Wyrley/ Cheslyn Hay which is still underprovided for in the latest draft, relative to its size and function as one of the district's 3 main settlements. As such we would not support any further uses on the current allocation site that would reduce its capacity for market and affordable housing.

However, if the Council were to consider additional Green Belt release to meet this G&T need, which must be an option given that most other sources of land seem to have been exhausted, then Miller would be keen to explore how some or all of their wider ownership (i.e. the 23 Ha site south of Holly Lane, including land to the west and south of the current allocation, as promoted in the Local Plan) could contribute to G&T needs as part of a comprehensive development, alongside regular market and affordable housing, and identified local needs for elderly housing and school parking.

As such we would welcome your thoughts and a further discussion on this matter.

Kind regards

Senior Director - Planning

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE

Queens House | Queen Street | Manchester | M2 5HT

18 February 2022

Persimmon Homes

I can confirm we are not willing to transfer a proportion of our site or any site we are promoting.

Kind regards,

Planning Manager

Persimmon Homes West Midlands

16 March 2022

Richborough Estates

In terms of the three sites we are promoting that are currently preferred options – we don't feel that any of these are particularly suitable for the delivery given their size and layouts. There are potentially other sites in our portfolio which have distinct parcels that could lend themselves more suitably but we wouldn't be able to promote these solely for traveller pitch use as we're contractually obliged to pursue residential led development.

Apologies we can't be of any more use.



Regional Manager



2nd Floor, Waterloo House, 20 Waterloo Street, Birmingham B2 5TB
Registered in England - 04773745

21 February 2022

RPS

Unfortunately the site is not available for G&T provision.

Senior Director - Planning
RPS | Consulting UK & Ireland
321 Bradford Street
Birmingham, West Midlands B5 6ET, United Kingdom



[rpsgroup.com](https://www.rpsgroup.com)

[LinkedIn](#) | [Facebook](#) | [Instagram](#) | [YouTube](#)

24 February 2022

St Philips

Given the land we are already proposing to dedicate to community infrastructure provision on the site – school/local centre/country park – we would not be keen to give up further developable area for Gypsy and traveller pitches.

Development Manager
St Philips

15 March 2022

Stansgate

I respond in respect of your email about sites for Gypsy and Traveller Pitches with specific reference to preferred option housing allocation Billy Buns Lane/Gilbert Lane, Wombourne (site 463b,c,d/284). The inference is that the allocated site would provide new dwellings alongside gypsy and traveller pitches. My client who owns the land does not support this in principle for the reasons as below.

Having regard to need, the District Council Gypsy and Traveller Accommodation Assessment evidences a need that exceeds the number of new pitches that can be made available from suitable extension to existing sites. The Assessment however does not identify where in the district the need arises and as such, technically the need could be met anywhere. It is not related to Wombourne and there is no requirement that it has to be met in Wombourne.

Whilst there may be a need to find additional pitches for gypsies and travellers as evidenced in the study carried out by the council, this site is inappropriate irrespective of need.

Impact of pitches on local character and amenity – the allocated site is adjacent to the existing development of Wombourne characterised by residential areas and the site itself includes an existing characterful farmstead that the proposed development aims to retain. Gypsy and traveller pitches would contrast with the established character of the residential areas and farmstead on site to the detriment of the local character. Whilst the open landscape character will change as a result of the development of dwellings, that will reflect the established character of the adjoining residential areas with similar built development in keeping.

Impact of pitches on amenity of local residents – experience generally has shown that gypsies and travellers pitches can cause conflicts and careful management is needed to ensure that tensions are not created with the nearby ‘settled community’ as such pitches do not always coexist peacefully with the settled community. Therefore, to respect both existing and proposed community relations and mitigate potential issues from a social perspective, pitches are better located outside of settlements. Furthermore, as part of a new development, delivery of the housing site might be prejudiced.

Potential noise from Stourbridge Road – The eastern edge of the site is defined by A449 Stourbridge Road which is dualled alongside the site. Pitches would be adversely affected by noise in the vicinity of the road that it would be difficult to address given the lightweight noise insulation of caravans. Built development is capable of being laid out to provide a noise shield and can be built with noise insulation and double glazing which makes the site suitable for built dwellings but not gypsy and traveller pitches.

Housing need – the site is allocated to meet an identified housing need and gypsy and traveller pitches on site might prejudice delivery of dwellings hence leading to a shortfall and under delivery of housing.

For these reasons, my client who owns the land respectfully cannot support gypsy and traveller pitches on this site.

*Principal Planner
Stansgate Planning*

21 February 2022

Taylor Wimpey

I write to confirm that Taylor Wimpey would **not** be willing to transfer a proportion of its site for this purpose. This position applies to the draft allocation at Poolhouse Road, Wombourne (Site 285) and land at Clent View Road, Stourbridge that Lichfields is promoting on behalf of Taylor Wimpey through the emerging Local Plan process.

Kind regards

Senior Planner

Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU

lichfields.uk

24 February 2022

Turley

Given the size of the sites we are promoting in Kinver on behalf of Bellway (i.e Hyde Lane and Dunsley Drive), gypsy and traveller provision on either site would not represent a viable proposition.

Please let me know if there are any queries.

Director

Turley

Appendix D: Past delivery of Gypsy and Traveller sites

Permanent pitches consented since 2007/08

Application Number	Site	Additional pitches	date pitches consented
06/00783/COU	Brinsford Bridge, Coven Heath	1	November 2007 (on appeal)
06/00005/COU	Hospital Lane, Cheslyn Hay	6	July 2007 (on appeal)
07/01059/COU	St James Park, Featherstone	9	June 2008 (on appeal)
09/00522/FUL	Poolhouse Barn, Old Stafford Road, Slade Heath	4	August 2010 (on appeal)
09/00686/VAR	The Bungalow, Rock Bank, Coven	2	August 2010 (on appeal)
09/00692/COU	Oak Tree Caravan Park, Featherstone	8	May 2010 (on appeal)
10/00027/FUL	Malthouse Lane, Calf Heath	6	June 2011 (allowed by SoS)
11/00125/FUL	Brinsford Bridge, Coven Heath	2	June 2011
11/00234/VAR	Hospital Lane, Cheslyn Hay	6	July 2011
11/00810/VAR	The Stables, Old Landywood Lane, Essington	3	February 2012
11/00957/VAR	The Bungalow, Rock Bank, Coven	2	February 2012
12/00679/COU	Hospital Lane, Cheslyn Hay	4	February 2013
12/00884/COU	High House, Hatherton	1	March 2013
14/00480/LUE	New Stables Poplar Lane	2	October 2014
14/00601/LUE	Glenside, Dark Lane	2	May 2015
15/00009/COU	Poolhouse Barn, Old Stafford Road	1	April 2015
09/00107/UNCOU	Kingswood Colliery	14	March 2016 (on appeal)
16/00147/FUL	Poolhouse Barn, Old Stafford Road	2	August 2016
18/00606/VAR	The Bungalow, Rock Bank, Coven	2	October 2018
18/00618/FUL	Land Rear of Hordern Lodge Ball Lane	1	April 2019
18/00789/COU	Brickyard Cottage	2	March 2020
20/00601/COU	Land Rear of Hordern Lodge Ball Lane	1	November 2020
20/00613/FUL	The Paddock, Anvil Park, Essington	2	December 2020
22/00082/COU	Land Rear of Hordern Lodge Ball Lane	2	July 2022

Appendix E: Extract of Policy HC9 and Policy DS4 from Publication Plan

Policy HC9: Gypsies Travellers and Traveling Showpeople

Applications for Gypsy, Traveller and Travelling showpeople pitches or plots will only be supported where all of the following criteria are met:

- a) Essential services such as power, water, drainage, sewage disposal and refuse/waste disposal are provided on site.
- b) The site is well designed and landscaped with clearly demarcated site and pitch boundaries using appropriate boundary treatment and landscaping sympathetic to, and in keeping with, the surrounding area. Where tree and hedgerow boundaries border the site these should be retained and where possible strengthened.
- c) A minimum 10% biodiversity net gain is demonstrated in accordance with Policy NB2.
- d) The amenity of the site's occupiers and neighbouring residential properties is protected in accordance with Policy HC11. Sites must be designed to ensure privacy between pitches and between the site and adjacent users, including residential canal side moorings. Proposals for caravans in residential gardens will be refused where they have an adverse impact on the amenity of neighbouring properties.
- e) The site can be safely and adequately accessed by vehicles towing caravans, is well related to the highway network, and provides adequate space within the site to accommodate vehicle parking and turning space to accommodate the occupants of the site.
- f) The proposal, either in itself or cumulatively having regard to existing neighbouring sites, is of an appropriate scale so as to not put unacceptable strain on infrastructure or dominate the nearest settled communities, to avoid problems of community safety arising from poor social cohesion with existing families.
- g) Pitches are of an appropriate scale for the size and number of caravans to be accommodated, without over-crowding or unnecessary sprawl. A single pitch to accommodate immediate family should only consist of one static caravan and one tourer caravan unless it can be demonstrated that additional caravans are necessary on the pitch to avoid overcrowding.
- h) Built development in the countryside outside the development boundaries is kept to the minimum required, in order to minimise the visual impact on the surrounding area. Where proposals are in the Green Belt, proposals will only be acceptable where they conform to Policy DS1. The proposed allocations of new pitches in the Green Belt set out in Policy SA6 will be acceptable in principle, subject to conformity with Policy SA6 and all criteria in this policy
- i) Any amenity buildings proposed are of an appropriate scale and reasonably related to the size of the pitch or pitches they serve.
- j) Proposals are not located in areas at high risk of flooding
- k) Where the proposal is for travelling showperson provision, the site is large enough for the storage, maintenance and testing of items of mobile equipment, and does not have an unacceptable impact on the amenity of neighbouring residential properties, including canal side residential moorings.

- l) Where the proposal is for a transit site, proposals avoid locations that are accessed via narrow country lanes and are in locations with good access to the strategic highway network.

Applications for pitches from individuals that do not meet the planning definition set out in Annex 1 of Planning Policy for Traveller Sites will also be considered in line with this criteria-based policy and other relevant policies on a case by case basis.

Development proposals should be consistent with other Local Plan policies.

Policy DS4: Development Needs

During the plan period up to 2039, the Council will promote the delivery of a minimum of:

- a) 9,089 homes over the period 2018-2039 to meet the districts housing target whilst providing approximately 13% additional homes to ensure plan flexibility. This housing target includes the district's own housing requirement of 5089 homes, plus a 4000-home contribution towards unmet housing needs of the Greater Birmingham and Black Country Housing Market Area.
- b) 99ha of employment land over the period 2020-2039 to ensure that South Staffordshire's identified need for employment land of 63.6ha is met, as well as making available a potential contribution of 36.6ha² to the unmet employment land needs of the Black Country authorities. 18.8ha of West Midlands Interchange will contribute towards South Staffordshire's employment land supply with an additional minimum 67ha available towards the unmet employment land needs of the Black Country authorities, which may increase depending on the employment land position of other local authorities in the site's market area. The remaining land supply on West Midlands Interchange (WMI) will be considered with related authorities through the Duty to Co-operate.
- c) 37 new Gypsy and Traveller pitches. This is the number of pitch options that have been assessed as deliverable against a larger need of 121 pitches, primarily to meet the future needs of existing families within the district. The Council has explored numerous options to meet this unmet need, including through ongoing Duty to Co-operate engagement with neighbouring authorities and promoters of residential site allocations, as well as assessing the suitability of publicly owned land. The Council will continue to work with Duty to Cooperate bodies to explore options for new or expanded public sites to meet this unmet need and will respond positively to windfall proposals that accord with Policy HC9.

² Of which 1.2ha is surplus ancillary office floorspace on strategic sites

Policies DS5, MA1, SA1, SA2, SA3, SA4, SA5, SA6 and SA7 set out how the above development needs will be delivered in a sustainable way that enhances the vitality of communities across South Staffordshire; supports economic growth, and which conserves and enhances the district's environmental assets. Delivery of new development will be monitored in line with the monitoring framework and the development needs set out above will be kept under review to inform whether a review of the Local Plan is required.

Appendix F: Email from Staffordshire County Council regarding availability of farm holdings

8 September 2022

Staffordshire County Council

In response to your enquiry around the potential release of County Farm Estate for the purpose of Gypsy and Travellers sites/pitches; the County Council do not consider that these sites would be acceptable or viable unless as part of a wider strategic development area / site allocation and comprehensive master-planning exercise.



Head of Planning Policy and Enabling

Economy, Infrastructure & Skills
Third Floor, Staffordshire Place 1
Tipping Street, Stafford, ST16 2DH

8 August

South Staffordshire Council

As you will be aware, further to our conversation a week or two back, Staffordshire County Council has previously submitted a number of its farm holdings to the district council (as set out in the attached) through our 'call for sites' process, indicating that it was willing to make these available for housing development. As part of our site assessment process for the Local Plan, we have also proactively started to assess these sites as potential options for gypsy and traveller sites, owing to the fact that we have a shortfall of traveller pitches against our needs requirement. Our focus has been to explore if there are site options specifically that could be publicly run so we could have control over who the pitches are rented to, in order to ensure those families with an identified need are allocated a pitch. As part of this process we have already assessed all South Staffordshire District Council land but have concluded that these are all unsuitable, in most instances due to an existing use already on site (e.g public open space).

Please find attached details of the county farm sites we are in the process of assessing. Please could you confirm, if through our assessment process, sites are identified as suitable, would Staffordshire County Council either:

- a) Be willing to make any of these sites available as a gypsy and traveller site and run them as a publicly run traveller sites?;or
- b) Be willing to make any of these sites available as a gypsy and traveller site and gift the land to the District Council or other public organisation to be run as a public traveller site?

As we are aiming to consult on our draft Local Plan in the Autumn, clarification on your position relating to the above would be welcomed as soon as possible.

Corporate Director Infrastructure and Business Growth
Corporate Leadership Team
South Staffordshire Council