

## Shropshire Council Response:

### Matter 5 - Gypsies, Travellers and Travelling Showpeople (policy SP10)

#### Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the provision of accommodation for Gypsies and Travellers.



## Questions

*Question 1. The Shropshire Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) was published in 2017 and then subject to a 'focussed review' and later update in 2019. The Council has confirmed in their response to our initial questions that the 2019 update did not involve a re-survey of the Gypsy and Traveller community. We have been informed that the 2019 update relied on the knowledge of the Council's Gypsy liaison team, other professionals, planning approvals and unauthorised encampments. Is the approach to meeting the needs of the Gypsy and Traveller and Travelling Show People community in the Shropshire, justified, effective and consistent with the Planning Policy for Traveller Sites (PPTS)?*

In particular:

- a. Table 7.4 of the GTAA (2019) sets out the past turnover rate of pitches/plots on public sites. The Council has relied on turnover as a way of meeting the accommodation needs of Gypsies and Travellers for quite a few years. Has this approach met these needs and if so, can the Council please provide evidence to show this?*

### **Shropshire Council Response:**

- 1.1. There has been ongoing monitoring and research into the needs of Gypsies and Travellers to ensure that the evidence base is kept up to date and that accommodation needs continue to be met. This evidence has informed the plan making process and consideration of planning applications.
- 1.2. An initial Gypsy and Traveller Accommodation Assessment (GTAA) was produced in 2014, revised February 2015, and updated in 2017 to take account of the implications of changes to Planning Policy for Traveller Sites in August 2015 (PPTS 2015). The Council's Gypsy Liaison Officer was involved in the preparation of all the GTAAs and the 2017 study included interviews with 89 households living on sites and 7 households living in bricks and mortar.
- 1.3. The household survey information, as presented in the GTAA 2019 (EV053.02), considered responses to questions relating to the perception of overcrowding issues which is summarised Tables 5.8 & 5.9. Of households living on a pitch, only 9.2% considered that their pitch was overcrowded.
- 1.4. Updated information on occupancy and the waiting list has also been looked at by Shropshire Council in considering need but cannot be detailed in responding to questions to prevent inadvertently identifying individual households.

- 1.5. On Council sites updated data was available from the Council's own site management data. Information on private sites, also from the Council's Gypsy Liaison Team, included vacancy information for the private sites obtained from their survey work which has a baseline date of 28th April 2022. From this doubling up of households was only evidenced on two pitches.
- 1.6. It can be noted that the Council allows doubling up on its pitches where it can be satisfactorily accommodated, there is sufficient space and as a temporary measure. Residents with a local connection are generally prioritised for a pitch on local authority site when one becomes available, thus helping to ensure known local need is met.
- 1.7. It is also considered that the overall current picture of occupancy, presented in Tables 3.1, 3.2 and 5.1 does not suggest significant over occupation on sites and indeed a number of planning permissions have been given (as set out in Table 6.1) for additional pitches or the provision of additional accommodation on pitches to provide enhanced family accommodation.
- 1.8. It has been demonstrated, as set out in response to ID1 Paragraph 16 (**GC4**- Council Response to ID1 & ID2 Planning Inspectors' Initial Questions) that, in order to address existing and likely future requirements, the Council previously engaged in a programme of pitch provision and site refurbishment. There continues to be proactive management by the Council, including liaison with other Local Authorities as well as with the Gypsy and Traveller community. More latterly the focus of the Council's provision has shifted to provision of a Travelling Showperson plot and transit provision, with successful delivery of the former and ongoing work to deliver the latter.
- 1.9. Additionally, the Council has recognised that, irrespective of pitches coming forward through turnover, that there will always be situations where specific accommodation needs come forward, as outlined at para 8.6 of the GTAA 2019 (**EV053.02**). Thus, in accordance with PPTS 2015 (para 11) and the recommendation in the GTAA 2019 (**EV053.02**) (para 8.13), any such proposals have been and can continue to be considered against an appropriate criterion based Local Plan policy.
- 1.10. The Council's approach is locally tailored and sensitive to the needs of a diverse community in terms of the size, nature and location of pitches. There is evidence set out in Table 6.1 that existing policy has allowed provision of pitches to meet needs for small family sites via the planning application process. Additionally, there is no

significant evidence of accommodation 'stress' with a lack of long-term unauthorised encampments and limited doubling up on sites.

- b. Should turnover data continue to be relied upon solely to calculate the future requirements of the area's GRT community? What certainty is there that turnover will continue at that rate? Is turnover on public pitches necessarily a sign of new pitches becoming genuinely available to meet the needs of the 43 families shown in the GTAA (2019) who meet the PPTS definition of Gypsy and Traveller?*

**Shropshire Council Response:**

- 1.11. PPTS 2015 sets out a requirement that Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely accommodation needs of travellers (both permanent and transit) in their area and states that the Government expects that 'local planning authorities should make their own assessment of need for the purposes of planning'. The PPTS however provides no specific methodological guidance on how to carry out a GTAA and the withdrawn Gypsy and Traveller and Gypsy and Traveller Accommodation Assessment Guidance (DCLG 2007) has not been replaced. However, the Council's specialist consultants Arc4, have prepared the successive GTAA reports using best practice and a tested approach, including through the Examination of the existing Adopted Plan SAMDev.
- 1.12. Notably, whilst there is currently no official guidance on how to carry out a GTAA, Arc4 the consultants responsible for preparing Shropshire's GTAA, have highlighted their expertise in this area, including supporting the Planning Advisory Service in 2021 in delivering a series of workshops about planning for gypsy and traveller sites. These workshops included the topics of robust needs assessment and making appropriate site provision (<https://www.local.gov.uk/pas/find-event/pas-past-events/planning-traveller-sites>).
- 1.13. On the basis of work since the 2019 Shropshire GTAA (**EV053.02**), Arc4 continue to recommend that the potential for pitches to come available on public sites should be considered as an element of supply. This is in line with previous GTAA guidance (CLG 2007) which also indicated that turnover should be considered to inform the assessment of need (para 62 bullet 2).
- 1.14. Turnover is therefore considered to be appropriately included as an element of supply. Other elements of supply can include regularisation of temporary/unauthorised sites, the

expansion/intensification of existing sites and planning permissions for new sites. For Shropshire, the principal potential supply of pitches is through turnover on Council sites and delivery of new sites.

- 1.15. Although turnover is identified as supply together with additional pitches that come forward through the planning application process, the future requirements for the Gypsy and Traveller community are considered separately as need by the methodology in the GTAA 2019 **(EV053.02)** as set out in paragraphs 7.7 to 7.26 and Tables 7.1 & 7.2 and supporting text (GTAA 2019 **EV053.02**). This includes need from emerging households, households in bricks and mortar and movement in and out of the County.
- 1.16. There has been ongoing monitoring of occupancy and turnover on public sites with turnover data now going back to 2012 (as noted by Paragraph 7.30 footnote 46 in the GTAA 2017 **(EV053.01)**). Using the 2017 study **(EV053.01)** as a basis, the 2019 GTAA **(EV053.02)** updated information relating to pitches, turnover on public sites and the overall picture of need. In effect, the Council have therefore carried out 3 studies since 2015 to ensure that the need for Gypsy and Traveller pitches and turnover is regularly reviewed and reconsidered. In the case of the GTAA 2019 **(EV053.02)**, as only two years had lapsed since the previous GTAA evidence, a focused review, using information derived from both the Council's planning and gypsy liaison functions, including the Gypsy Liaison Team's broader knowledge of the Gypsy and Traveller community, provided a proportionate approach to updating the evidence base to ensure sufficient robustness.
- 1.17. In respect of turnover, the projected level of turnover of 9.3 pitches per annum (identified in in para 7.36 of the GTAA 2019 **(EV053.02)**) reflects the known rates of turnover only on pitches on public sites owned and operated by the Council which form around 40% of current supply, the remainder being privately owned and managed. There is inevitably turnover on private sites and vacancies are evident in Table 5.1 below, but this is excluded as the rates over time cannot be evidenced in the same way that they can be on Council sites and allocation is not subject to Council control. Nevertheless, it will also continue to contribute to meeting the needs of PPTS definition Gypsies & Travellers.
- 1.18. Furthermore, turnover assumptions for public sites are cautious and have been moderated where it was considered appropriate to do so. For example, figures have been moderated to take account of higher than expected turnover at the Craven Arms site in 2015 (as

explained in paragraphs 7.30 to 7.32 in the GTAA 2019 **(EV053.02)**).

- 1.19. The detailed consideration of site management information also takes into account the reasons why pitches became available and who occupied them to exclude internal movement.
- 1.20. The analysis in the GTAA 2019 **(EV053.02)**, demonstrates that genuine turnover occurs showing that pitches are released which become available for re-occupancy. The GTAA evidence did not identify any anticipated constraints to future turnover. However, monitoring of movement since the 2019 study **(EV053.02)**, reflects the restrictions on moving and other impacts of the Covid 19 pandemic. Over the period July 2019 to April 2022, there was a reduced turnover to 11, averaged to around 4 each year. This period of time is considered atypical due to the implications of lockdown on the ability to travel and it is expected that future monitoring will show turnover continuing at the level evidenced by the GTAA 2019 **(EV053.02)**. However, this will of course be kept under review.
- 1.21. Applications for pitches are considered in accordance with the Council's allocation policy. This requires that applicants are Gypsies or Travellers but does not restrict pitches to those meeting PPTS definition as the management of pitches in Shropshire Council ownership is undertaken by the element of the Council operating as an accommodation provider rather than as a planning authority.
- 1.22. Whilst different 'definitions' are used for the different Council functions, in any event, the GTAA assesses and acknowledges the requirement to meet the need for the whole Gypsy and Traveller community. The projections of turnover set out in Table 7.8 GTAA 2019 **(EV053.02)** and Table 9.1 below in response to Question 9 of this Matter 5 demonstrate that there is in any case sufficient turnover to meet overall need.
- 1.23. The GTAA 2019 **(EV053.02)** demonstrated that 9.3 pitches p.a. was a realistic assumption based on a conservative assessment which looked at detailed site management data to support the survey work which had been carried out. This coupled with an understanding of local demographics including emerging household need and movement in and out of the County helps provide a greater understanding as to future requirements and provides confidence that accommodation needs can continue to be met.

- c. *Do the turnover assumptions relied upon to meet future needs include all vacant plots/pitches, bearing in mind some may be vacant for a particular reason or are not genuinely available because of cultural or family matters?*

**Shropshire Council Response:**

1.24. As discussed in response to Question 1b) of this Matter, turnover assumptions are cautious, exclude 'internal churn' and only apply to Council pitches which in total form around 40% of current supply. Whilst routine maintenance and interim repairs between occupants may be necessary this is not expected to affect pitch availability over the longer term.

1.25. Given the detailed management information available, the Council is confident that turnover has been robustly forecast and that 'released' pitches will meet expected future needs.

- d. *How have the Council taken account of changes in particular family circumstances such as household formation, or those of new families? Will the overall supply of pitches grow to meet the increased needs of the Gypsy and Traveller community in Shropshire that will arise from new household formation as well as potentially new families moving into the area?*

**Shropshire Council Response:**

1.26. The GTAA 2019 (**EV053.02**) carefully models future need arising from household formation and families moving in to the area. New household formation in Shropshire is recognised by the GTAA (**EV053.02**) as a key driver of future need. When establishing overall need, the GTAA evidence base takes into account future household growth (as summarised in Table 7.2 of the GTAA 2019 (**EV053.02**)) by analysing the demography of Gypsy and Traveller households. The approach is further explained in paragraphs 7.25 and 7.26 in the GTAA 2019 (**EV053.02**). The GTAA also considers the level of in-migration into Shropshire.

1.27. Further analysis of detailed local authority data in Table 7.6 (GTAA 2019 (**EV053.02**)) considers the origins of residents moving onto pitches which had become available since January 2014. Paragraphs 7.33 and 7.34 illustrate that 61 households had moved onto a pitch in the previous 5 years of whom 39 had migrated into Shropshire.

1.28. Table 7.7 (GTAA 2019 **EV053.02**) shows that pitches have become vacant because of movement to pitches outside the County and through movement to Bricks and mortar. There are a number of

unknowns because unlike the application to live on a site, the local authority cannot require details of a destination on departure from a site.

- 1.29. The waiting list (pitch register) has been recently reviewed to establish 'current' interest in obtaining a pitch on Council sites. The waiting list which has 17 applicants (as at 04 05 22) provides an indication of demand for pitches and preferred locations, but it is understood that this does not always translate in to the acceptance of a pitch when it is offered and that individuals are not automatically removed from the pitch register for this reason. Households may remain on the register for site preference or a range of other reasons. The waiting list also reflects movement between private and public sites, between Bricks and Mortar and sites (both onto sites from Bricks and Mortar and off sites into Bricks and Mortar), and out of County movement. This all contributes to variability in need when a snapshot in time is taken, highlighting the value of monitoring turnover data over time.
- 1.30. The grant of planning permissions (detailed in Table 6.1 below) has increased the number of pitches and demonstrates the Council's responsiveness to situations where specific evidenced need is not being met by the current supply of pitches. This accords with the GTAA 2019 (**EV053.02**) recommendation (para 8.13) that the Council considers applications for small sites for family use as they arise. This means that if a family is moving into the county or existing families need additional accommodation, their specific needs can be considered.
- 1.31. The Draft Shropshire Local Plan also recognises that small scale non-strategic needs will arise within proposed Draft Policy DP8 (Gypsy and Traveller Accommodation). This draft policy provides for a clear and positive approach to the consideration of windfall development to meet any demonstrated accommodation needs of Gypsy and Travellers. Specifically, the policy sets out a criteria-based approach for the consideration of proposals to allow for the delivery of sites of an appropriate scale in suitable locations to meet such need through the development management process. Furthermore, there is also a commitment in the draft plan policy (DP8 para 4d) to ongoing monitoring and review to identify and address any changes in strategic requirements.



- e. *We note that the 2017 GTAA recorded 83 Gypsy and Traveller families living in bricks and mortar housing (data taken from 2011 census). How does the GTAA (2019) take account of changing preferences of those settled Travellers who make up most of the area's GRT community? Does the evidence provide a robust assessment that vacancies will arise and be available for those not currently on a pitch? Have their needs been considered in the 2019 update?*

**Shropshire Council Response:**

- 1.32. In the context of this question, the term 'settled Travellers' is understood to mean those living in bricks and mortar accommodation rather than Gypsies and Travellers who have ceased a travelling lifestyle as referenced in the PPTS Annexe 1 Glossary who are considered in response to Question 2.
- 1.33. Whilst the PPTS does not reference the assessment of the needs of Gypsies and Traveller living in bricks and mortar housing, and these form part of the broader housing need, it is appreciated that there is inevitably movement between different forms of accommodation and an interaction between provision. The GTAA (2019) **(EV053.02)** methodology thus recognises that it is important that the flow to bricks and mortar and from bricks and mortar households to pitches is assessed and evidenced a net flow from pitches to bricks and mortar accommodation (in Table 7.1).
- 1.34. The methodological approach to considering bricks and mortar need is set out in para 7.14 of the GTAA (2019) **(EV053.02)**. In summary the needs of bricks and mortar households were assessed by:
- a. Engaging with bricks and mortar households where possible (in the case of Shropshire, households were interviewed with appropriate contacts being supplied by the Gypsy Liaison team).
  - b. Drawing on available data from 41 studies carried out by Arc4 across the country. These indicated that 5.3% of households in bricks and mortar want to move to a pitch. This is based on surveys of 348 households nationally who want to move to a pitch.
  - c. Use the housing register to identify any bricks and mortar households who want a pitch.
- 1.35. On the basis of the above a need for 4 pitches from households living in bricks and mortar was identified and taken into account in needs modelling.

- 1.36. It can be noted that one of the issues faced by researchers is the reluctance of people in bricks and mortar accommodation to engage with the GTAA process, particularly if families do not want to identify as GRT for fear of discrimination and prejudice. Arc4 are however able to draw on their extensive national work. The general conclusions drawn from this are that flows tend to be from pitches to bricks and mortar; and whilst there are some households who would prefer to live on a pitch, this is only a small minority of those living in bricks and mortar.
- 1.37. This is reinforced by the experience of the Council's Gypsy Liaison Team and is reflected by only 2 applicants currently in Bricks & Mortar on the waiting list (of a total of 17). Of these, one currently resides in Shropshire. The Gypsy Liaison Team have also indicated that in their experience whilst there are some individuals moving between pitches and Bricks & Mortar, this is a small number and they are not aware a significant level of latent or hidden demand from their interaction with the Gypsy and Traveller community.
- 1.38. It is therefore considered that the evidence has provided a robust assessment of need from Bricks and Mortar, which is proportionate and realistic, given the issues and constraints identified. Subsequent consideration of current waiting list data and qualification criteria has reaffirmed the limited scale of requirements from the Bricks and Mortar dwellers and that these individuals are not restricted from accessing pitches on Council sites subject to them meeting the eligibility criteria that apply to all Gypsy and Travellers.
- 1.39. The availability of vacancies on pitches via turnover has been confirmed by responses to previous questions including a-d above.

*f. What measures have been employed to avoid double-counting due to circumstances other than movement within the Local Plan area, for example where there has been a change in head of household?*

**Shropshire Council Response:**

- 1.40. The 2019 GTAA (**EV053.02**), in reviewing the 2017 GTAA (**EV053.01**) to ensure that the evidence remained robust and up to date, incorporated refinements to the methodology which, as well as considering the rate and location of turnover (tables 7.4 & 7.5) also analysed the nature of and reasons behind why pitches had become available and who subsequently occupied them (as summarised in tables 7.6 and 7.7).

- 1.41. Tables 7.4, 7.5, 7.6 and 7.7 in the GTAA 2019 **(EV053.02)** are based on information from record keeping by the local authority since 2014 and present a summarised picture based on detailed data and qualitative information provided by the Council's Gypsy Liaison Service from their site management and other roles. The quality of data supplied by the Council is commended by the consultants in the 2019 report **(EV053.02)** (para 7.31) and comes from a variety of sources including the detailed application form required to be completed by applicants for a pitch.
- 1.42. The Gypsy Liaison Team have confirmed that, where there is an existing household on a pitch and a named head of household changes to that of another adult individual legitimately living as part of that household on the pitch, e.g., from husband to wife, that this would not be recorded as turnover.
- 1.43. The Council does have succession arrangements within its pitch management policy which state:
- 'Succession is normally accepted where parent(s) are deceased leaving a dependant who has lived on the plot for more than 12 months providing the dependant is of age and does not present any management problems.'
- 1.44. This provision obviously allows for any dependent(s) to remain on the plot. In these relatively infrequent circumstances, the pitch may provide for emerging households and if that was the case it would be considered a new household. These emerging households are however likely to have been identified as future needs by the GTAA, and in these circumstances therefore it is considered that it is legitimate to consider these as new households.
- 1.45. The Gypsy Liaison Service have been fully involved in developing the GTAA evidence, from inception of the 2019 GTAA **(EV053.02)** to its conclusion and were active partners in previous GTAAs. As well as directly supplying the information required by the consultants who prepared the GTAA, the Gypsy Liaison service were also able to provide clarifications on base data and review and feedback on draft reports and conclusions. The Gypsy Liaison Team were specifically aware that the purpose of requiring the data on changes of pitch occupation was to identify pitches which were genuinely vacated, eliminating movement from one Council pitch to another and other obvious double counting. This helped to avoid any misunderstanding of study requirements, including the objective of robustly evidencing turnover. As such, the raw data has been screened, carefully assessed and the possibility of double counting minimised.

- g. How has the Council ensured that concealed households and other forms of overcrowding have been considered in their assessment of future needs?*

**Shropshire Council Response:**

- 1.46. It is confirmed that the Council has considered overcrowding in their assessment of future needs, both through the GTAA 2019 evidence **(EV053.02)** and through its understanding of occupancy on sites, the waiting list, and other information which is available through its Gypsy Liaison function.
- 1.47. The household survey information, as presented in the GTAA 2019 **(EV053.02)**, provides a summary of responses to questions relating to the perception of overcrowding issues as set out in Tables 5.8 & 5.9. Where a respondent has indicated that they consider that their home or pitch is overcrowded a professional judgement, based on their experience in the field, was made by Arc4 as to whether the perceived overcrowding results in a need for an additional pitch. The questionnaire informing the GTAA evidence also specifically asked if there were any concealed or doubled up households on a pitch and this was also factored into needs analysis.
- 1.48. Arc4 have also highlighted that they consider it important to take into account the overall structure of households in order to avoid any double counting in analysis. For instance, if there is family unit (couple and son) with a married son living on a pitch, the needs analysis would consider this as either an immediate emerging need or as a concealed household but not both.
- 1.49. The response to Question 1a also considers measures of overcrowding and highlights that the current picture of site occupancy does not suggest significant over occupation on sites.

**Shropshire Council Response Conclusion:**

- 1.50. In conclusion therefore it is felt that it has been demonstrated that there is an appropriate, locally tailored approach proposed to meeting the needs of the Gypsy and Traveller community over the Plan period, which is justified by robust and proportionate evidence, including the GTAA 2019 **(EV053.02)**.

*Question 2. What evidence exists about the future requirements of other caravan and boat dwellers and how does the Local Plan address any identified needs?*

- 2.1. The Gypsy and Traveller Accommodation Assessment (GTAA) 2019 (**EV053.02**) considers need both in the context of the PPTS definition of a Gypsy and Traveller, and the cultural definition of a Gypsy and Traveller. The assessment of future supply specifically demonstrates (as summarised in paragraph 7.36) the ability to meet both these needs.
- 2.2. The needs and requirements of other caravan and boat dwellers are considered within the assessment of Local Housing Need (**EV069**) as they are captured within the sub-national household projections which underpin this assessment. They are also considered within Part 2 of the Strategic Housing Market Assessment (SHMA) (**EV097.02**) undertaken to inform the draft Shropshire Local Plan.
- 2.3. The housing needs of these other caravan and boat dwellers will be addressed as part of the overall spatial strategy for the level and distribution of residential development that is primarily captured within draft Policy SP2 of the draft Shropshire Local Plan, and then expanded upon within the wider draft Policies of the draft Shropshire Local Plan.
- 2.4. This approach within the draft Shropshire Local Plan recognises that Gypsies and Travellers have a cultural tradition of nomadism and/or caravan living, the accommodation needs of which must be specifically reflected in the draft Shropshire Local Plan.
- 2.5. It is acknowledged that this type of accommodation can provide a more affordable type of rural 'housing' and meet the lifestyle choice/preference, rather than cultural needs, of these other (non Gypsy and Traveller) households. This does not necessarily mean that their needs cannot be met through other forms of housing.
- 2.6. The draft Shropshire Local Plan's strategy and policies do provide for rural development as part of meeting local housing need, but there is not a desire to encourage a proliferation of caravan parks in unsustainable locations in rural areas for permanent residential use. Instead, the strategy seeks to deliver a range of good quality housing to meet all needs including the delivery of rural affordable housing. This approach is consistent with Paragraph 80 of the National Planning Policy Framework (NPPF).
- 2.7. Within Shropshire there are series of navigable waterways including the Shropshire Union and Llangollen Canals and moorings range from sites on serviced marinas to moorings along watercourses. The

Canal & River Trust are responsible for issuing boat licences to residents and users of canals in Shropshire and whilst these do not specify if it is a residential rather than leisure use, it is understood most licences for permanent moorings are for leisure purposes.

- 2.8. Arc4s national work, which has included interviews with houseboat residents, indicates living on a houseboat is generally a lifestyle choice and there are only small numbers of people who identify as boat travellers/bargee travellers.
- 2.9. It is also understood that many liveaboard boaters do so without having a permanent mooring as they can moor in many places. Therefore, it is the availability and access to facilities such as water points, wet waste disposal, refuse/recycling that is important, more than mooring space.
- 2.10. Whilst Shropshire Council is aware that the specific allocation of marina development in Local Plans is generally not supported by the Canal & River Trust some provision to meet requirements in Shropshire is proposed. Outline Planning Permission has been granted for a new marina in Ellesmere (on the Llangollen Canal) and proposals in the draft Shropshire Local Plan could also facilitate a new marina in Market Drayton (on the Shropshire Union Canal). These could contribute to the provision of supporting infrastructure. Additionally, the approach within the draft Shropshire Local Plan provides scope to positively consider proposals for additional infrastructure provision within proposed settlement development boundaries.
- 2.11. Additionally, whilst draft Policy SP10 of the draft Shropshire Local Plan relates to tourism and leisure use, it nevertheless recognises the valuable role of canals as a multifunctional resource and that they should be protected against other forms of development that conflict with their use.
- 2.12. Shropshire Council will continue to liaise with the Canal & River Trust and if it is considered necessary in the future, will support the process of identifying additional permanent residential moorings and/or infrastructure provision.

*Question 3. What changes have occurred to the baseline position since the GTAA (2019) was undertaken about households permanently occupying caravans, Travelling Showpeople, the supply of sites, plots and pitches, transit demand and supply of transit sites?*

### Shropshire Council Response

3.1. The tables below reflect baseline data from the GTAA 2019 **(EV053.02)**, information from records of planning permissions (to 31<sup>st</sup> March 2022) and survey work carried out by the Council's Gypsy Liaison Team. Occupancy on Council sites has been updated from the Council's own site management data and that for private sites has been updated by the Council's Gypsy Liaison Team, who had vacancy information for the private sites obtained from the Caravan Count (and follow up phone contact for most sites) which has a baseline date of 28th April 2022.

**Table 3.1: Summary of Gypsy & Traveller sites July 2019 to 31<sup>st</sup> March 2022**

Type of site	No. of sites 2019	No. of sites 2022	Total Pitches 2019	Total Pitches 2022	Occupied Pitches 2019	Occupied Pitches 2022	Vacant Pitches 2019	Vacant Pitches 2022	No. h'holds 2019	No. h'holds 2022
Total authorised (private permanent)	23	28	83	97	76	90	7	6	82	94
Total authorised (Council)	4	4	64	64	63	53	1	11	63	54
Total private tolerated	1	0	1	0	1	0	0	0	1	0
Total Temporary Authorised	0	1	0	1	0	1	0	0	0	1
<b>TOTAL Gypsy and Traveller</b>	<b>28</b>	<b>33</b>	<b>148</b>	<b>162</b>	<b>140</b>	<b>144</b>	<b>8</b>	<b>17</b>	<b>146</b>	<b>149<sup>1</sup></b>
Changes 2019 - 2022		+5		+14		+4		+9		+2

3.2. Table 3.1 provides a summary of changes in provision and site occupancy since the 2019 GTAA. There has been an overall increase in both the number of sites and pitches, with a total of 14 additional pitches some of which have been delivered on existing sites. The single pitch site included in the temporary authorised category has a 12 month permission.

3.3. There has also been an increase in vacancies on Council sites from 1 to 11 vacancies. The 6 current vacancies on private sites are of a similar scale but different locations to 2019, when 7 were recorded. It is recognised that whilst vacancies are totalled, a number of the

<sup>1</sup> Excludes households on transit pitches

pitches on private sites are only available to serve specific individuals/family groups due to the use of restrictive condition(s). However, pitches on private sites do not contribute to turnover assumptions and future supply modelling within the 2019 GTAA(**EV053.02**). It is nevertheless worth noting as evidence of continuation of movement on and off both public and private pitches, with a known degree of interplay with households moving between both types of sites and as well as into and out of the County. This is also known from contextual information provided by the Gypsy Liaison Team.

- 3.4. Table 3.2 (below) provides site specific commentary on changes since 2019 and specifically identifies the location of vacant pitches, with sites Priv10 and Priv23 being currently unoccupied and a further site Privnew 25 at Gobowen, being a permission, which has not yet been implemented.
- 3.5. There is variation in occupied pitches and number of households due to multiple households living on some pitches. Notably a number of pitches are considered to provide family site accommodation rather than a 'traditional' single pitch. Detailed information on occupancy was available, however, specific pitch occupancy and additional households on pitches are not individually specified for the purposes of ensuring anonymity of households. It can be noted however that only 2 households in total were identified as doubling up.
- 3.6. Private transit pitches were in use but these households, as they are on transit provision, are not included in the total number of households in summary table 3.1 above. No additional transit sites have been given consent and transit demand (as evidenced by incidences of unauthorised encampments) has reduced overall as discussed further in relation to Question 4.
- 3.7. Other changes since 2019 include relocation of the family of Travelling Showpeople from a temporary site to a new permanent family plot.

**Table 3.2: Occupancy of Gypsy & Traveller sites and Travelling Showperson yards (as of 28<sup>th</sup> April 2022)**

Site Code	Site Name	Address	Type of Site	Total Pitches	Occupied Pitches	Vacant Pitches 2022	Vacant pitches 2019	Changes since July 2019
LA1	Craven Arms Caravan Site	Long Lane, Craven Arms, SY7 8DU	Authorised Council	16	9	7	1	+6 vacant
LA2	Cross Houses Caravan Site	To south of Cross Houses on A448 SY5 6JR	Authorised Council	5	5	0	0	None



Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Site Code	Site Name	Address	Type of Site	Total Pitches	Occupied Pitches	Vacant Pitches 2022	Vacant pitches 2019	Changes since July 2019
LA3 /LA3A	Park Hall Caravan Site (including expansion)	Whittington Road, Oswestry, SY11 4AY	Authorised Council	25	21	4	0	+4 vacant
LA4	Manor House Lane Caravan Site	Higher Heath, Whitchurch, SY13 2HT	Authorised Council	18	18	0	0	None
<b>Sub Total Council:</b>				<b>64</b>	<b>53</b>	<b>11</b>	<b>1</b>	
Priv1	The Caravan Park	Sheinton Road, Cressage, SY5 6DH	Authorised Private	6	6	0	0	None
Priv2	The Caravan	Froxley, Moreton Hall, Shawbury, SY4 4ES	Authorised Private	1	1	0	0	None
Priv3	Marton Grange Caravan Park	Myddle Wood, Baschurch, SY4 3RY	Authorised Private	8	8	0	0	None
Priv4	The Bungalow (Brookside Caravan Park)	Kinnerley, SY10 8EL	Authorised Private	10	8	2	0	+2 vacant
Priv5	The Oakery	Wheatcommon Lane, Richards Castle, SY8 4AF	Authorised Private	10	10	0	0	None
Priv6	Annscroft Site	The Farriers, Annscroft SY5 8AN	Authorised Private	1	1	0	0	None
Priv7	Lacon Street	Prees (field number 9752) SY13 2EL	Authorised Private	2	2	0	0	None
Priv8	Field View	Green Lane, Onibury, SY7 9BL	Authorised Private	1	1	0	0	None
Priv9	Adastra Services	Tern Hill, Market Drayton, TF9 3QD	Authorised Private	1	1	0	0	None
Priv10	Former Goods Yard	Webster's Lane, Hodnet, TF9 3JH	Authorised Private	1	0	1	0	+1 vacant
Priv11	Land Adjacent to Brook Cottage	Wem Lane, Saulton, SY4 5RT	Authorised Private	1	1	0	0	None
Priv12	Orchard Cottage	The Orchard, Rock Green, Ludlow, SY8 2DS	Authorised Private	2	2	0	0	None
Priv13	The Caravan Site	Sheinton Road, Cressage, SY5 6DH	Authorised Private	1	1	0	0	None
Priv14	Pigeon Door	Frodesley, SY5 7NQ	Authorised Private	2	2	0	0	None

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Site Code	Site Name	Address	Type of Site	Total Pitches	Occupied Pitches	Vacant Pitches 2022	Vacant pitches 2019	Changes since July 2019
Priv15	Adbo Hill	Tern Hill, Market Drayton TF9 2JF	Authorised Private	4	4	0	4	-4 vacant
Priv16	Dorrington	Old R.O.C. Post, Church Road , Dorrington SY5 7JL	Authorised Private	2	2	0	0	None
Priv17	Land off Pixley Lane	Hinstock, TF9 2TN	Authorised Private	3	3	0	3	-3 vacant
Priv18	Manor House Lane Caravan Site	Higher Heath, Whitchurch, SY13 2HT	Authorised Private	10	10 <sup>2</sup>	0	0	None
Priv19	Barkers Green (The Old Orchard)	Land adj. the Builders Yard, known as No. 8 Barkers Green, Wem, SY4 5JN	Authorised Private	1	1	0	0	Additional permission 22.09.2021 to increase number of caravans on site
Priv20	Shawbury Heath	Sparrow Cottage, Shawbury Heath, SY4 4EA	Authorised Private	2	2	0	0	None
Priv21	The Hawthorns	Land South of Albrighton Bypass A41	Authorised Private	3	3	0	0	None
Priv22	The Paddocks	Warrant Road, Stoke Heath, TF9 2DZ	Authorised Private	12	12	0	0	+4 additional pitches permitted
Priv23	The Former Nursery	Barkers Green, Wem, SY4 5JL	Authorised Private	3	0	3	0	+ 3 vacant pitches
Priv 24	Fenn Green	Land Adjacent The Round House, Fenn Green, Alveley	Authorised Private	1	1	0	0	Previously tolerated site authorised as a family site November 2020. March 2022 further permission to allow additional static caravans.
Priv new25	Five Crosses	Five Crosses, Gobowen	Authorised Private	1	0	0	n/a	Consent for new site (approved 02 10 19) not yet implemented
Priv new26	South East of The Hawthorns	South East of The Hawthorns, Newport Road Albrighton	Authorised Private	1	1	0	n/a	New Authorised Site + 1pitch
Priv new27	South of Idle Patch	South Of Idle Patch, Main Road, Dorrington	Authorised Private	1	1	0	n/a	New Authorised Site + 1 pitch

<sup>2</sup> Excludes transit pitches

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Site Code	Site Name	Address	Type of Site	Total Pitches	Occupied Pitches	Vacant Pitches 2022	Vacant pitches 2019	Changes since July 2019
Priv new28	Silverwoods	Netherton Road Highley	Temporary Authorised Private	6	6	0	n/a	New Authorised Site + 6 pitches
Priv Temp01`	Hawthorn Paddock	Hawthorn Paddock, Welshampton	Temporary Authorised Private	1	1	0	n/a	New Authorised Site + 1 pitch
<b>Sub Total Private:</b>				<b>98</b>	<b>91</b>	<b>6</b>	<b>98</b>	
<b>TOTAL GYPSY AND TRAVELLER</b>				<b>162<sup>3</sup></b>	<b>144</b>	<b>17</b>	<b>152</b>	
Yard Code	Yard Name	Address	Type of Yard Ownership	Total Plots				
TSP New	Glovers Meadow	Glovers Meadow Oswestry;	Authorised	1	1	0	3	New Authorised permanent plot providing extended family accommodation
<b>TOTAL Travelling Showperson</b>				<b>1</b>	<b>1</b>	<b>0</b>	<b>3</b>	

*Question 4. The GTAA (2019) does not show a requirement for more sites for transit plots/pitches and recommends that the effect of recently consented provision on unauthorised encampments is monitored and where necessary reviewed. What monitoring has been undertaken in the intervening period and does this signify any change in needs for transit provision?*

**Shropshire Council Response:**

**Figure 4.1: Unauthorised encampment 2014 to 2021**

Year	Number of Encampments
2014	10
2015	18
2016	37
2017	41
2018	33
2019	20
2020	9
2021	13

<sup>3</sup> Includes PRIV25 authorised but not yet implemented

- 4.1. Table 4.1 above updates the annual figures on unauthorised encampments set out in the GTAA 2019(**EV053.02**) to the latest available year, 2021. The monitoring is carried out by the Gypsy Liaison Team, who are directly involved in managing unauthorised encampments on Council land and the data includes these encampments and other known unauthorised encampments on private land. The Gypsy Liaison Team have confirmed that there are no long-term unauthorised encampments and therefore that the figures relate solely to short term encampments as described in the GTAA 2019 (**EV053.02**) section (paras 7.40 – 7.44) on transit site requirements.
- 4.2. The data shows a general year on year decrease from a peak of 41 encampments in 2017 to 9 in 2020, rising slightly to 13 in 2021. As noted in respect of turnover on sites, movement in 2020 and 2021 may not be typical due to lockdowns and other potential impacts of the Covid 19 pandemic. Therefore, whilst encampments had reduced prior to March 2020, continued monitoring will be needed to establish whether the significant reduction in 2020 and 2021 is a long-term trend.
- 4.3. However irrespective of the recorded level of unauthorised encampment activity, there are still considered to be potential benefits in proceeding with Council transit site provision to support the management of unauthorised encampments and to possibly assist in meeting other short term emergency accommodation requirements. Therefore, following discussion with the Department for Levelling Up, Housing and Communities, the Gypsy Liaison Team is currently preparing an application for funding from the Traveller Site Fund for temporary transit provision on the site identified on the edge of Shrewsbury (which has been subject to consultation as previously described in the Council's response initial questions **GC4 ID1** Paragraph 16 - paragraph 71) whilst also moving forward towards formal Council approval for the scheme.

*Question 5. Please provide a list of council owned sites and private sites along with current vacancy data for each of them.*

**Shropshire Council Response:**

- 5.1. Table 5.1 below provides a list of sites with their status i.e., authorised/unauthorised/tolerated and whether they are in Council or private ownership. Occupancy on Council sites has been updated from the Council's own site management data and that for private sites has been updated from other information also supplied by the

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Council's Gypsy Liaison Team. Vacancy information for the private sites was obtained from the Caravan Count and follow up phone contact for most sites by the Gypsy Liaison Team. This information, which has a baseline date of 28<sup>th</sup> April 2022, therefore provides a very recent picture of occupancy on sites which can be easily compared to the data set out in Table 4.6, GTAA 2017 (EV053.01) & Table 4.6, GTAA 2019(EV053.02).

**Table 5.1: Vacant Pitches at Gypsy & Traveller sites and Travelling Showperson yards (as of 28th April 2022)**

Site Code	Site Name	Address	Type of Site	Ownership	Total Pitches	Occupied Pitches	Vacant Pitches
LA1	Craven Arms Caravan Site	Long Lane, Craven Arms, SY7 8DU	Authorised	Council	16	9	7
LA2	Cross Houses Caravan Site	To south of Cross Houses on A448 SY5 6JR	Authorised	Council	5	5	0
LA3/LA3	Park Hall Caravan Site( including expansion)	Whittington Road, Oswestry, SY11 4AY	Authorised	Council	25	21	4
LA4	Manor House Lane Caravan Site	Higher Heath, Whitchurch, SY13 2HT	Authorised	Council	18	18	0
<b>Sub Total:</b>				<b>Council</b>	<b>64</b>	<b>53</b>	<b>11</b>
Priv1	The Caravan Park	Sheinton Road, Cressage, SY5 6DH	Authorised	Private	6	6	0
Priv2	The Caravan	Froxley, Moreton Hall, Shawbury, SY4 4ES	Authorised	Private	1	1	0
Priv3	Marton Grange Caravan Park	Myddle Wood, Baschurch, SY4 3RY	Authorised	Private	8	8	0
Priv4	The Bungalow (Brookside Caravan Park)	Kinnerley, SY10 8EL	Authorised	Private	10	8	2
Priv5	The Oakery	Wheatcomm on Lane, Richards Castle, SY8 4AF	Authorised	Private	10	10	0
Priv6	Annscroft Site	The Farriers, Annscroft SY5 8AN	Authorised	Private	1	1	0

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Site Code	Site Name	Address	Type of Site	Ownership	Total Pitches	Occupied Pitches	Vacant Pitches
Priv7	Lacon Street	Prees (field number 9752) SY13 2EL	Authorised	Private	2	2	0
Priv8	Field View	Green Lane, Onibury, SY7 9BL	Authorised	Private	1	1	0
Priv9	Adastra Services	Tern Hill, Market Drayton, TF9 3QD	Authorised	Private	1	1	0
Priv10	Former Goods Yard	Webster's Lane, Hodnet, TF9 3JH	Authorised	Private	1	0	1
Priv11	Land Adjacent to Brook Cottage	Wem Lane, Soultton, SY4 5RT	Authorised	Private	1	1	0
Priv12	Orchard Cottage	The Orchard, Rock Green, Ludlow, SY8 2DS	Authorised	Private	2	2	0
Priv13	The Caravan Site	Sheinton Road, Cressage, SY5 6DH	Authorised	Private	1	1	0
Priv14	Pigeon Door	Frodesley, SY5 7NQ	Authorised	Private	2	2	0
Priv15	Adbo Hill	Tern Hill, Market Drayton TF9 2JF	Authorised	Private	4	4	0
Priv16	Dorrington	Old R.O.C. Post, Church Road, Dorrington SY5 7JL	Authorised	Private	2	2	0
Priv17	Land off Pixley Lane	Hinstock, TF9 2TN	Authorised	Private	3	3	0
Priv18	Manor House Lane Caravan Site	Higher Heath, Whitchurch, SY13 2HT	Authorised	Private	10	10	0
Priv19	Barkers Green (The Old Orchard)	Land adj. the Builders Yard, known as No. 8 Barkers Green, Wem, SY4 5JN	Authorised	Private	1	1	0

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Site Code	Site Name	Address	Type of Site	Ownership	Total Pitches	Occupied Pitches	Vacant Pitches
Priv20	Shawbury Heath	Sparrow Cottage, Shawbury Heath, SY4 4EA	Authorised	Private	2	2	0
Priv21	The Hawthorns	Land South of Albrighton Bypass A41	Authorised	Private	3	3	0
Priv22	The Paddocks	Warrant Road, Stoke Heath, TF9 2DZ	Authorised	Private	12	12	0
Priv23	The Former Nursery	Barkers Green, Wem, SY4 5JL	Authorised	Private	3	0	3
Priv 24	Fenn Green	Land Adjacent The Round House, Fenn Green, Alveley	Authorised	Private	1	1	0
Priv new25	Five Crosses	Five Crosses, Gobowen	Authorised	Private	1	0	0 <sup>4</sup>
Priv new26	South East of The Hawthorns	South East of The Hawthorns, Newport Road Albrighton	Authorised	Private	1	1	0
Priv new27	South of Idle Patch	South Of Idle Patch, Main Road, Dorrington	Authorised	Private	1	1	0
PrivNew28	Silverwoods	Netherton Road Highley	Authorised	Private	6	6	0
Priv Temp01`	Hawthorn Paddock	Hawthorn Paddock, Welshampton	Temporary Authorised	Private	1	1	0
<b>Sub Total:</b>				<b>Private</b>	<b>98</b>	<b>91</b>	<b>6</b>
<b>TOTAL GYPSY AND TRAVELLER</b>					<b>162</b>	<b>144</b>	<b>17</b>
Yard Code	Yard Name	Address	Type of Yard	Ownership	Total Plots		
TSP New	Glovers Meadow	Glovers Meadow Oswestry;	Authorised	Leasehold	1	1	0
<b>TOTAL Travelling Showperson</b>					<b>1</b>	<b>1</b>	<b>0</b>

<sup>4</sup> Consent for new site not yet implemented

*Question 6. What new pitches have been granted planning permission since 2016/2017 when the GTAA (2017) found a shortfall of 17 pitches in Shropshire?*

**Shropshire Council Response:**

6.1. Table 6.1 provides a summary of pitches and the Travelling Showpeople plot granted planning permission to 31<sup>st</sup> March 2022 since the 2017 GTAA (**EV053.01**) which identified a shortfall of 17 pitches excluding turnover. The table includes a planning permission given for the site which had tolerated status: PrivTolerated1, Adjacent The Round House, Fenn Green. Also included are two recent consents 21/04587/FUL The Old Orchard and 21/01175/VAR Adjacent The Round House which enhance the accommodation available on existing sites as detailed by the explanatory notes.

**TABLE 6.1: Additional Pitch Supply (Planning consents) since GTAA 2017 Baseline (April 2017 to 31<sup>st</sup> March 2022)**

Additional Pitch Supply (Planning consents) from July 2017 to 31 <sup>st</sup> March 2022	Description of Development	Date of Approval	Explanatory Note	Number of pitches or plots
18/02596/VAR Manor House Lane Caravan Site Higher Heath, Whitchurch	Variation of Conditions attached to permission 14/04248/FUL dated 29.04.15, to increase the number of pitches on the site from 6 to 10, provide 3 transit pitches and increase the size of the approved dayroom on plot 6	07.11.2018	Additional provision at site identified as Priv18 in GTAA 2017	4 permanent pitches 3 transit pitches
16/05730/FUL The Former Nursery, Barkers Green, Wem	Change of use of land for the stationing of caravans for residential purposes for 3no. gypsy pitches, formation of hardstanding & ancillary utility/dayroom	07.03.2018	Site included as Priv23 in GTAA 2019	3 pitches
19/03361/FUL: Five Crosses, Gobowen	Change of Use from pony paddock to gypsy/traveller site to include one static caravan, one touring caravan and one amenity block and bio-disc	02.10.2019	Personal consent	1 pitch
19/03156/FUL: South East of The Hawthorns, Newport Road Albrighton;	Use of land for the stationing of caravan for residential purposes for 1 gypsy pitch	24.10.2019	Personal consent	1 pitch



Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Additional Pitch Supply (Planning consents) from July 2017 to 31 <sup>st</sup> March 2022	Description of Development	Date of Approval	Explanatory Note	Number of pitches or plots
18/04048/FUL: South of Idle Patch, Main Road, Dorrington	Change of use of land to a one family traveller site to include siting of one mobile home, one touring caravan, mobile ablution block and associated development	07.09.2020	Personal consent	1 pitch
20/02669/FUL: Adjacent The Round House, Fenn Green, Alveley	Sect73A application for use of land as travellers caravan site comprising of 3 caravans	18.11.2020	Site identified as PrivTolerated1 in GTAA 2017. Personal consent	1 pitch gained authorised status No change to overall pitch number
19/04688/FUL: Glovers Meadow Oswestry	Change of use of land to provide business base/residential accommodation for a local family of travelling show people	28.05.2020	Permanent site replacing temporary yard TSP1 (at Ifton Heath School) identified in GTAA 2017	1 plot
21/02133/FUL: The Paddocks, Warrant Road, Stoke On Tern	Redevelopment of part of existing site to enable the increase in the number of residential caravan pitches and three additional dayrooms for ancillary use	24.08.2021	Increase from 8 plots to 12 plots (site identified as PrivTemp 1 in GTAA 2017 & Permanent site Priv22 in GTAA 2019 reflecting variation of condition to allow permanent use 18.07.17 )	4 pitches
21/03044/FUL: Hawthorn Paddock, Welshampton	S73 application for the change of use from pony paddock to single pitch gypsy/traveller site including 1No static caravan, 1No touring caravan, amenity block and associated development	23.12.2021	Temporary consent (12 months)	1 pitch
21/01129/FUL Silverwoods Netherton Road Highley	Section 73A application for the siting of six static caravans and six mobile caravans; laying of hardstanding, construction of new access and erection of 3 No. amenity buildings to include the change of use of land	22.02.2022	Personal consent	6 pitches

Shropshire Council Response to Matter 5 of the Stage 1: Matters, Issues and Questions on the draft Shropshire Local Plan

Additional Pitch Supply (Planning consents) from July 2017 to 31 <sup>st</sup> March 2022	Description of Development	Date of Approval	Explanatory Note	Number of pitches or plots
21/04587/FUL The Old Orchard, Weir Lane, Barkers Green, Wem	Redevelopment of existing site to enable the increase in the number of residential caravan pitches with 4no caravans with no more than 3no static caravans/mobile homes to include hardstanding and erection of utility building and extension of existing dayroom	21.03.2022	Redevelopment of existing site (identified as PRIV19 Barkers Green in GTAA 2017) to provide 2 additional caravans and supporting facilities. Personal consent	No change to overall pitch number
21/01175/VAR: Adjacent The Round House, Fenn Green, Alveley	Variation of condition (number of caravans) pursuant to 20/02669/FUL to allow for the siting of three static caravans on	23.02.22	The variation allowed 3 static caravans to replace the two tourers on the site. A replacement day room was also permitted. Personal consent	No change to overall pitch number- family pitch
<b>Total</b>			<b>Permanent</b>	<b>20</b>
			<b>Temporary</b>	<b>1</b>
			<b>Transit</b>	<b>3</b>
			<b>Previously tolerated to authorised</b>	<b>1</b>
			<b>Travelling Showpeople Plot</b>	<b>1</b>

*Question 7. It is clear from the Inspector's report in relation to the SAMDev examination that several historic planning permissions for Gypsy and Traveller sites do not have conditions restricting occupancy to Gypsies and Travellers. If this is the case, can details be provided of whether those sites are currently occupied by gypsies and travellers or by members of the settled population?*

**Shropshire Council Response:**

7.1 It is acknowledged that the SAMDev Inspector's report references a limited number of historic permissions which do not restrict occupancy of sites to gypsies and travellers by condition. These were identified by the Inspector following the submission of records of planning consents relating to sites representing the wide range of

approved provision available in Shropshire which formed the supply of available pitches included in the GTAA (2014) by the Council.

- 7.2 Reviewing the SAMDev Inspector's interim response during Examination, the sites highlighted by the Inspector were: Warrant Road Caravan Park 2, Marton Grange Caravan Park, Myddle Wood; The Bungalow (Brookside Caravan Park), Kinnerley.
- 7.3 The status of Warrant Road Caravan Park 2, a large privately owned site was explored in detail. It became apparent on investigation that this site was in the process of works to upgrade the site to accommodate more park home type accommodation. Since the site owner also confirmed to the Council that the pitches on the site would be available to both Traveller and non-Traveller families, the Council acknowledged the Inspector's concerns regarding the validity of the inclusion of any pitches on this site as part of the Gypsy and Traveller provision. This site was subsequently deleted from supply and does not feature in either the 2017 **(EV053.01)** or 2019 GTAA **(EV053.02)**.
- 7.4 The Inspector also identified that the original 1988 permission for Marton Grange (included as Priv3 GTAA 2019 **(EV053.02)** with 8 pitches) and a subsequent variation of condition did not ensure occupation by gypsies and travellers but that a subsequent permission in 2014 for one pitch did appear to restrict occupancy to gypsies and travellers.
- 7.5 The SAMDev Inspector further identified the site known as The Bungalow (Brookside Caravan Park), Kinnerley identified as Priv4 with 10 pitches in the GTAA 2019 as being vulnerable due to lack of an appropriate condition. This was due to an application to modify a condition relating to planning permissions 89/6074 and 94/8756 being approved on 15 March 2004 and creating a new permission but with no condition imposed restricting occupation to gypsies and travellers. The Inspector was concerned that, 'If it is the case that this permission was subsequently implemented (i.e., larger static caravans were stationed on the site than previously permitted), it would appear that the occupation of pitches by non-traveller families may not be in breach of a planning condition.'
- 7.6 The Local Planning Authority works closely with the Council's Gypsy Liaison service who have on the ground involvement and strong mutual relationships with the Gypsy and Traveller communities and private site owners. The Gypsy Liaison service also have responsibility for carrying out the Caravan Count which provides them with additional opportunities to observe any changes in occupancy. The Gypsy Liaison service have therefore been able to

provide a useful insight into the current status of sites and assist with monitoring for planning purposes.

- 7.7 In the case of Marton Grange the Gypsy Liaison officer is familiar with the site owner, who has for some time provided pitches for gypsy and travellers on the site. There is no evidence of changes of occupation for other than gypsies and travellers. Given the site owner's long-term involvement with the site there is no reason to doubt that the site will not remain available for occupation by Gypsy and Travellers.
- 7.8 Similarly, in respect of The Bungalow (Brookside Caravan Park), to the best of the Gypsy Liaison Officer's knowledge, this site is currently and has only ever been occupied by Gypsy and Travellers. Whilst there is effectively no condition restricting occupation it is not considered that the nature of occupancy is likely to change and thus the site will continue to contribute to provision for Gypsy and Travellers.
- 7.9 As a general comment, it is understood that the characteristics of Marton Grange and Brookside Caravan Parks are very much typical of gypsy and traveller sites in the locality, and that they would not be generally attractive to non-traveller residents.
- 7.10 Practice in respect of the use of conditions to restrict changes to occupancy has obviously evolved since these historic consents but, for the reasons set out above, despite the issue with the conditioning of the planning permission, it is still considered that they remain a bona fide part of gypsy and traveller provision.

*Question 8. Did the Council undertake a 'call for sites' capable of meeting future needs and if so, what was the outcome?*

- 8.1 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).
- 8.2 The promoted sites were not subject to formal sustainability appraisal or progressed further as part of the Local Plan Review process since the appropriate, up to date evidence (including the 2017 Gypsy and Traveller Accommodation Assessment (GTAA) **(EV053.01)** and the subsequent GTAA 2019 Update **(EV053.02)**

identified no strategic need for additional general sites to be allocated.

- 8.3 In reaching this conclusion the Council also took into account: the SAMDev Plan Inspector's position (paras 77 & 79 **EV010.01**) regarding the role of turnover; progress being made in identifying a site for the Travelling Showpeople; the Council's separate work on transit requirements; the additional delivery of sites from planning permissions and discussions with the Gypsy Liaison Team regarding capacity, including qualitative considerations that may influence requirements for sites.
- 8.4 It was ultimately concluded that 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.

*Question 9. What is the future supply for the first 5 years, years 6-10 and where possible, years 11-15 in terms of private and public provision respectively in terms of both numbers of pitches and plots? Are there any temporary permissions which could lapse within the plan period which would affect this supply?*

- 9.1. Table 9.1 sets out the current and expected supply of pitches using the GTAA 2019 (**EV053.02**) as the baseline supply. Subsequent permissions (detailed in Table 6.1) all for private sites, have added 14 pitches to the supply since the baseline date. Of these, 1 pitch (21/03044/FUL: Hawthorn Paddock detailed in Table 6.1) is subject to a 12 month consent and therefore would, if not renewed, lapse within the Plan period.
- 9.2. Supply for subsequent years, set out in table 9.1 below in 5 year segments over the whole plan period representing the initial 5 years 2021/22- 2025/26, years 6-10 and years 11-15 is identified solely from turnover<sup>5</sup> on Council (public) sites as no allowance is included for turnover on private sites.
- 9.3. It would be expected, given evidence of past permissions, that private supply would be supplemented by the delivery of sites via the proposed Local Plan policy mechanism in the circumstances set out by Draft Local Plan Policy DP8 (Gypsy and Traveller Accommodation) and its supporting explanatory text.

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<sup>5</sup>Using evidenced turnover rate from GTAA 2019 of 9.3 p.a.

9.4. Forecasting in relation to the later Plan period is obviously subject to greater uncertainty and monitoring would inform the consideration of the need to review the Local plan and supporting evidence.

**Table 9.1: Existing and Future Pitch supply 2019- 2038**

Baseline Supply GTAA 2019 (from Table 4.5)	Pitch	Plot	
Authorised permanent private pitches	83		
Authorised permanent Council pitches	64		
Private Tolerated	1		
<b>TOTAL:</b>	<b>148</b>		
Temporary Travelling Showpersons Yard (Plot)		<b>1</b>	
Additional Supply from permissions August 2019 – 31 <sup>st</sup> March 2022	Pitch	Plot	
Five Crosses, Gobowen	1		
South East of The Hawthorns	1		
South of Idle Patch	1		
The Paddocks	4		
Hawthorn Paddock	1		
Silverwoods	6		
<b>TOTAL ( all private)</b>	<b>14</b>		
Permanent Travelling Showpersons Yard (Plot )		<b>1</b>	
Supply from pitches expected to become available on Council sites			
Initial 5 years 2021/22- 2025/26	46		
5 years 2026/27- 2030/31	46		
5 years 2031/32- 2033/34	46		
4 years 2034/35- 2037/38	37		
<b>TOTAL Plan Period from 31<sup>st</sup> March 2022</b>	<b>175</b>		

*Question 10. What measures have been employed within the Council's assessment to ensure that the future supply of sites, plots and pitches will be capable of meeting future needs in terms of size, location, cultural requirements, family connections and tenure type?*

10.1. The needs modelling by Arc4 in the GTAA 2019 **(EV053.02)** carefully reviewed need arising from households planning to move and households likely to form in the shorter term (5 years) based on actual household data. It then considered longer-term need by modelling the demographics of the population. As such, this information provides evidenced projections of need for permanent pitches.

10.2. Requirements for transit provision are considered separately in the GTAA 2019 **(EV053.02)** in relation to survey responses and data on unauthorised encampment. The GTAA 2019 **(EV053.02)** highlights that unauthorised encampments are a good indicator of transit need

and it can be seen from this data that there has been a reducing level of unauthorised activity. This suggests reducing requirements but as set out in response to Question 4, continued monitoring is needed.

- 10.3. Travelling Showpeople are considered separately. Recent provision of a permanent site has met the needs for a family long-established in Shropshire. There are no other known requirements for this very specific type of provision, but the Council is aware as highlighted in the GTAA 2019 (**EV053.02**) that it should continue to engage with the Showman's Guild and consider any future need should it arise.
- 10.4. The survey information obtained to support the development of the GTAA provided useful information in respect of household characteristics, including ethnicity, and the Gypsy Liaison Team has a strong awareness of the different household make up on Council sites and the broader community. The Local Planning Authority is fortunate to be able to call upon the expertise and knowledge of an active and knowledgeable Gypsy Liaison Team who have positively responded to requests for information and have developed their monitoring and record keeping to facilitate the provision of appropriate information to support planning evidence requirements. This team also provide information to support the consideration of planning applications.
- 10.5. The assessment has used appropriate modelling and sought to be rigorous in examining sources of supply and modest in its turnover assumptions, with detailed site management data, based on specific knowledge of site occupants and applicants ensuring this. However, given the relatively small size, diversity and dynamics of the Gypsy and Traveller population there would be significant difficulties in subdividing and accurately predicting the likely future needs in terms of size, location, cultural requirements, family connections and tenure type.
- 10.6. It can be seen through the evidence presented that there are a large number of different types of sites across the County and that over the last 5 years there has been significant delivery of additional pitches. It is considered that there is a sufficient number and range of sites, both private and public, across Shropshire to provide flexibility for likely future needs. However, it is appreciated that this is a dynamic population and therefore that there may be a mismatch at times between available pitches and requirements in terms of location, family connections etc.
- 10.7. The existing adopted Plan Policy Core Strategy Policy CS12 ( Gypsies and Traveller Provision) provides the current policy framework to enable the provision of sites to meet need .The

proposed Policy DP8 Gypsy and Traveller Accommodation would update this policy to reflect PPTS 2015 and NPPF, whilst providing for a continuation of the approach which has resulted in the delivery of: small sites in Shropshire through the development management process (as identified in Table 6.1); provision of additional pitches at existing Shropshire Council managed sites and a site for Travelling Showpeople. It is thus considered that the inclusion of an appropriate policy mechanism within the Draft Plan (Proposed Draft Policy DP8 Gypsy and Traveller Accommodation) to deliver appropriate sites as such need arises, provides an additional means of ensuring that different considerations can continue to be taken into account by the Local Planning Authority.