

Wokingham Borough Council

Topic Paper: Housing: Gypsy and Traveller accommodation

Wokingham Borough Local Plan Update:
Proposed Submission Plan (Regulation 19)

February 2025



**WOKINGHAM
BOROUGH COUNCIL**

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1. Introduction

- 1.1 The purpose of this topic paper is to explain the background to the policies relating to Gypsy and Traveller accommodation within the Local Plan Update (LPU): Proposed Submission Plan (September 2024).
- 1.2 The paper includes sections on national policy relating to Gypsy and Traveller accommodation, evidence of accommodation need within Wokingham Borough, and how policies are seeking to meet this accommodation need.

2. Background and policy context

Relevant Legislation and Case Law

- 2.1 Section 8 of the Housing Act 1985 (as amended by Section 124 of the Housing and Planning Act 2016) includes a duty for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed.
- 2.2 The Equality Act 2010 protects Romany Gypsies and Irish Travellers as ethnic groups of protected characteristics for whom 'culturally suitable' housing should be provided.

National policy and Guidance

- 2.3 The National Planning Policy Framework (NPPF) sets the context in which local plans must be prepared. Additionally in respect to the provision of accommodation for the Gypsy, Traveller and Travelling Showpeople communities, national policy is also contained within the Planning Policy for Traveller Sites (PPTS) document.
- 2.4 The current version of the NPPF was published in December 2024. The NPPF 2024 sets transitional arrangements for plans at an advanced stage of preparation. The Proposed Submission Plan will be submitted under these transitional arrangements, meaning it will be examined against the previous version of the NPPF published in December 2023. Key sections are summarised below.

National Planning Policy Framework

- 2.5 The National Planning Policy Framework (NPPF) is the principal document which sets out national planning policies for England.
- 2.6 NPPF 2023 Paragraph 60 states that to support the objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.
- 2.7 NPPF 2023 paragraph 63 states:

"...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) ...travellers..."

2.8 NPPF 2023 footnote 28 states:

“Planning Policy for Traveller Sites sets out how travellers’ housing needs should be assessed for those covered by the definition in Annex 1 of that document.”

2.9 Paragraph 69, continues stating that:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for five years following the intended date of adoption³⁵; and

b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.”

2.10 NPPF 2023 footnote 41 the NPPF makes clear that a five-year supply of deliverable sites for travellers as defined in Annex 1 to Planning Policy for Traveller Sites should be assessed separately, in line with the policy in that document.

Planning Policy for Traveller Sites

2.11 The PPTS sets out national planning policy specifically regarding Gypsy and Traveller and Travelling Showpeople. The PPTS should be read in conjunction with the NPPF.

2.12 The definition of Gypsies and Travellers is set out at PPTS Annex 1 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 or permanently, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

2.13 The definition of Travelling Showpeople is also set out at PPTS Annex 1 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 or permanently, but excludes Gypsies and Travellers as defined above..”

2.14 Both definitions differ from the definition in a previous version of the PPTS originally published in 2015, by adding the words “or permanently”. This has the effect of reverting the definitions back to those which were included in the original 2012 PPTS. In practice, this means that the PPTS again applies to Travellers and Travelling Showpeople who have permanently ceased to live a nomadic lifestyle due to reasons of education, health, or old age.

2.15 PPTS paragraph 3 states:

“The... overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.”

2.16 In order to achieve this, PPTS paragraph 4 lists the following aims:

- a. that local planning authorities should make their own assessment of need for the purposes of planning*
- b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites*
- c. to encourage local planning authorities to plan for sites over a reasonable timescale*
- d. that plan-making and decision-taking should protect Green Belt from inappropriate development*
- e. to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites*
- f. that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective*
- g. for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies*
- h. to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*
- i. to reduce tensions between settled and traveller communities in plan-making and planning decisions*
- j. to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*
- k. for local planning authorities to have due regard to the protection of local amenity and local environment*

2.17 Paragraph 9, within the ‘Plan-making’ section states that:

“Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.”

2.18 Paragraph 10 requires local planning authorities, in producing their local plans, to:

*“a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets
b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15
c) 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)
d) 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
e) protect local amenity and environment.”*

2.19 The PPTS states at paragraph 11 that:

“Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.”

2.20 As per paragraph 13, local planning authorities are required to ensure that their policies:

*“a) promote peaceful and integrated co-existence between the site and the local community
b) promote, in collaboration with commissioners of health services, access to appropriate health services
c) ensure that children can attend school on a regular basis
d) provide a settled base that reduces both the need for long-distance travelling and possible environmental damage caused by unauthorised encampment
e) provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development*

f) avoid placing undue pressure on local infrastructure and services
g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans
h) 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.”

- 2.21 PPTS paragraph 16 confirms Traveller sites (both temporary or permanent) are inappropriate development in the Green Belt unless the exceptions set out in the NPPF 2024 apply.,

Planning Practice Guidance

- 2.22 The Planning Practice Guidance (PPG) on ‘Housing needs of different groups’ refers to the application of the PPTS in assessing the housing needs of specific groups (Paragraph: 001 Reference ID: 67-001-20190722).

3. Gypsy and Traveller Need

Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2023)

- 3.1 The latest full assessment of the accommodation needs for the Gypsy and Traveller community is the [Gypsy and Traveller and Travelling Showperson Accommodation Assessment \(2023\) \(GTAA 2023\)](#). The assessment considered the overall cultural accommodation needs of all Gypsy and Traveller households, as well as the specific need of nomadic households.
- 3.2 The GTAA 2023 identified no accommodation need for Travelling Showpeople accommodation.
- 3.3 Regarding Gypsy and Travellers, the GTAA 2023 identified a cultural need for 86 net additional pitches between 2022/23 and 2039/40. 53 of the 86 pitches represented the need of nomadic households. An overview of the need identified by the GTAA 2023 is set out in the table below.

Table 1: GTAA 2023: Pitch requirement 2022/23 to 2039/40

| <u>Period (years)</u> | <u>Cultural need (pitches)</u> | <u>Of which PPTS Superseded need (pitches)</u> |
|--|--------------------------------|--|
| 5yr pitch need (2022/23 to 2026/27) | 35 | 35 |
| Longer-term need (2027/28 to 2039/40) | 51 | 18.2 |
| Total pitch need (2022/23 to 2039/40) | 86 | 53 |

- 3.4 The longer term need for 51 pitches is further broken down into the following need (see Table 6.4 of the GTAA 2023):
- 2027/28 – 2031/32: 15 pitches (3 pitches per annum)
 - 2032/33 – 2036/37: 26 pitches (5.2 pitches per annum)
 - 2037/38 – 2039/40: 10 pitches (3.3 pitches per annum)

- 3.5 In light of the December 2023 changes to the definition of Gypsies and Travellers (discussed at paragraphs 2.11 and 2.13 above) the nomadic need identified in the GTAA is no longer relevant and the cultural need is the appropriate need for the LPU to consider.

4. Meeting the Gypsy and Traveller accommodation needs

- 4.1 Policy H9: 'Gypsies and Travellers and Travelling Showpeople provision' of the Proposed Submission Plan identifies that provision will be made for a minimum of 86 net additional pitches. This represents the pitch target as required by PPTS paragraph 9. In accordance with the PPTS, the council has sought to plan to meet need in full. The remainder of this section sets out the sources of supply towards meeting this target.

Deliverable Supply since GTAA 2023 base date

- 4.2 In accordance with national policy and guidance, sites with planning permission are considered to be deliverable. Accordingly, those sites with planning permission (and any subsequent completions) at the base date of the GTAA 2023 were factored into the needs modelling.
- 4.3 Since the GTAA 2023 the council has granted planning permission for 3 additional pitches at Dun Elms, Nelsons Lane, Hurst (application reference 241486 granted 29 August 2024¹). In addition, appeal permission 180072 for one additional pitch at Wind in the Willows is considered to have been implemented. The GTAA 2023 recognised the existing one pitch within the base supply, but the second pitch was not included within the supply model as the permission at that time was thought to have lapsed². These pitches represent deliverable supply capable of contributing towards identified needs.
- 4.4 Whilst no further pitches have been granted since the GTAA 2023, planning permission is not a pre-requisite for sites being considered deliverable. The test in national policy is that sites are "available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years" (PPTS footnote 4). The second sentence of footnote 4 specifically provides guidance on how sites with permission should be

¹ Details available here:

<https://planning.wokingham.gov.uk/FastWebPL/detail.asp?AltRef=241486&ApplicationNumber=241486&AddressPrefix=&Postcode=&KeywordSearch=&Submit=Search>

² It had been considered that the permission lapsed, based on the fact the additional pitch had not been delivered by 1 November 2022 which was 3 years from the grant of permission. It has now been established through a full enforcement investigation of the site and the planning history the permission was implemented by the provision of sub-base, drainage and other operational works. It is therefore now reflected in supply.

considered, but it is clear that planning permission is not necessary for a site to be deliverable. The relevant test is whether the likelihood of the site being delivered is no greater than a ‘realistic prospect’ within 5 years; there is no requirement for delivery to be certain or probable.

4.5 At the time of writing, a full application at Plot 10 Highfield Park (reference 223669) was before the Council for “the proposed addition of 5 no. mobile home pitches and re-arrangement of existing pitches on plot 10 for gypsy and traveller residential use” having been validated on 8 February 2023. The site is previously developed land within a wider mobile home site on which Gypsy and Traveller households live and the proposal was not for major development. In March 2023, the case officer had drafted their delegated report recommending the application for approval and consequently, on 23 March 2023, instructed the Council’s legal department to draft the Section 106 agreement to secure the required Thames Basin Heaths Special Protection Area (TBH SPA) mitigation. The Section 106 agreement has been signed and the council is currently awaiting payment before issuing the planning permission. While there have been delays with the payment of the necessary TBH SPA mitigation, the Council has proactively agreed to extensions of time to provide flexibility to the applicant.

4.6 Table 2 below shows sites considered to be deliverable within the next 5 years.

Table 2 – Additional sites with planning permission and considered deliverable through the planning application process since the GTAA 2023

| Site | Application number | Net additional pitches | Date of Permission | Pitches Under construction | Year of Projected Delivery |
|-------------------------------|--------------------|------------------------|--------------------|----------------------------|----------------------------|
| Plot 10 Highfield Park | 223669 | 4 ³ | N/A | N/A | 2026/27 |
| Dun Elms, Nelsons Lane, Hurst | 241486 | 3 | 29/08/2024 | N/A | 2027/28 |

³ Plot 10 is not currently restricted to occupancy to Gypsy and Traveller households. At the time the application was submitted, Plot 10 had been cleared and vacant of occupiers for at least 12 months. Previously Plot 10 contained a number of mobile homes with the number of static caravans across the plot (and wider site) often being in flux. Given the previous lawful position of the application site was one residential caravan plot (not Gypsy and Traveller), the application comprises a net increase of 5 units of accommodation but a net creation of 6 Gypsy and Traveller pitches. Based on previously available data from the 2017 GTAA (Plot vacant when 2023 GTAA undertaken) Plot 10 was understood to accommodate 2 Gypsy and Traveller households. On that basis, a conservative approach has been taken which assumes the net increase in terms of supply towards meeting currently assessed need is 4 households, i.e. 4 pitches.

| | | | | | |
|---------------------|--------|---|------------|-----|---------|
| Wind in the Willows | 180072 | 1 | 01/11/2019 | N/A | 2025/26 |
| | | 8 | | | |

4.7 There have been no losses of existing pitches in the period since the GTAA 2023.

4.8 In summary, in addition to base supply in the GTAA 2023, a total of 8 pitches are considered deliverable at the time of writing. The remaining need within the plan period is therefore reduced to 78 pitches.

Local Plan Update approach to meeting remaining needs

4.9 The Proposed Submission Plan includes a combination of measures to address the remaining accommodation need of the Gypsy and Traveller community to 2040. The measures included in the plan comprise the following:

- Allocating specific sites for additional Gypsy and Traveller pitches;
- Requiring strategic scale development to include appropriate onsite provision of Gypsy and Traveller pitches as part of a mixed community;
- Approving applications for pitches which accord with a specific criteria-based policy;
- Protecting existing Gypsy and Traveller and Travelling Showpeople pitches from redevelopment or change of use to other uses.

4.10 These sources of supply are addressed in turn below.

Site allocations

4.11 In order to allocate land for Gypsy and Traveller development, the council firstly had to establish the location and amount of land that was available. As detailed in the Housing and Economic Land Availability Assessment 2024 (HELAA), the council publicised an initial 'Call for Sites' from 11 January 2016 to 5 February 2016 and from 9 May 2016 to 3 June 2016. This 'call' invited land promotions for any planning use, with Gypsy and Traveller and Travelling Showperson use specifically included within the submission form. Subsequently, the council has invited further site promotions through all consultation exercises and continued to accept land promotions throughout the preparation of the plan.

4.12 A focused call for sites with the potential for Gypsy and Traveller pitches was publicised from 6 January to 17 February 2023 in order to understand whether any

additional opportunities existed which should be assessed, given that few opportunities had to been identified by previous calls and through consultations.

- 4.13 As a result of these call for sites exercises, a total of 21 sites were promoted for Gypsy and Traveller use, either solely for that use or amongst other selected uses. Upon further consideration through the HELAA process, a number of these sites were deemed to be unsuitable for Gypsy and Traveller use or were no longer available. All promoted sites and a summary of their deliverability is provided in Table 3. Further detail is contained within the HELAA⁴.

Table 3 – Sites promoted for Gypsy and Traveller use

| HELAA reference | Site name | Deliverability summary |
|-----------------|---|--|
| 5BA013 | Woodlands Farm, Wood Lane | Assessed as potentially developable through HELAA process. Proposed for allocation. |
| 5BA036 | High Barn Farm, Commonfield Lane | Assessed as potentially developable through HELAA process.. Proposed for allocation. |
| 5FI001 | Tintagel Farm, Sandhurst Road. | Proposed for allocation in Revised Growth Strategy (2021) for 5 pitches. Subsequently landowner confirmed no longer available for Gypsy and Traveller use. |
| 5FI002 | Heartwood Lodge | Assessed as unsuitable through HELAA process. |
| 5FI005 | Silverstock Manor | While assessed as potentially developable, site considered to perform less well than other potential options and lack of certainty over the continued availability of the site for pitches. |
| 5FI012 | Land opposite Hall Farm, Lower Sandhurst Road | Assessed as unsuitable through HELAA process. Appeal for promoted use dismissed in December 2017. |
| 5FI015 | Land to rear of 166 Nine Mile Ride | Proposed for allocation in Revised Growth Strategy (2021) for 4 pitches. Subsequently obtained planning permission for 4 pitches. Site considered to be at capacity and landowner not pursuing additional pitches. |
| 5FI027 | Land lying to the rear of 115 – 137 Nash Grove Lane | Assessed as unsuitable through HELAA process. |
| 5FI032 | Honeysuckle Lodge, Commonfield Lane | Assessed as potentially developable through HELAA process. Proposed for allocation. |

⁴ Available at: <https://www.wokingham.gov.uk/planning-policy/evidence-studies>

| | | |
|--------|---|--|
| 5FI050 | Land at Longwater Lane | Land promoted for 1 pitch and subsequently permission granted for 1 pitch. Promoted site area considered to be at capacity. |
| 5HU018 | Land on north west side of Nelsons Lane | Land promoted for 2 pitches and subsequently permission allowed for 2 pitches at appeal. Promoted site area considered to be at capacity. [NB: additional area of land adjacent to the site comprises Dun Elms which has subsequently obtained permission for 3 additional pitches as detailed at paragraph 4.3] |
| 5HU025 | Hedgerley Stables | Assessed as unsuitable through HELAA process. |
| 5HU026 | Hedgerley Stables | Assessed as unsuitable through HELAA process. |
| 5HU054 | Poppies Farm | Assessed as unsuitable through HELAA process. |
| 5HU055 | Wind in the Willows | Assessed as unsuitable through HELAA process. |
| 5SO007 | Land adjacent to Model Farm Cottages, Bath Road | Assessed as unsuitable through HELAA process. Appeal for promoted use dismissed in August 2017. |
| 5SW027 | Fairlands, Church Road, Farley Hill | Land has subsequently obtained consent for alternate use, consequently no longer available. |
| 5TW013 | Land opposite 136-144 Wargrave Road | Site benefits from temporary permission for Gypsy and Traveller use. Site located in Green Belt and exceptional circumstances not considered to exist. |
| 5WK042 | Woodside Caravan Park, Blagrove Lane | Assessed as potentially developable through HELAA process. Proposed for allocation. |
| 5WW003 | Pine Ridge Park, Nine Mile Ride | While assessed as potentially developable, site considered to perform less well than other potential options and lack of certainty over the continued availability of the site for pitches. |
| 5WW005 | Old Sawmill Lane | Site below the size threshold capable of accommodating pitches. |

4.14 A total of 4 sites have been assessed through the HELAA process as being potentially suitable for Gypsy and Traveller use and are confirmed to be available (as detailed in Table 4). This includes one site – High Barn Farm – which is in council ownership, where provision and management will be overseen by the council.

Table 4 – Sites proposed for allocation in the Regulation 19 Plan

| Ref | Site name | Approx no. pitches |
|---------|--|--------------------|
| SS14.1 | High Barn Farm, Commonfield Lane, Barkham | 20 |
| SS14.2 | Honeysuckle Lodge, Commonfield Lane, Barkham | 4 |
| SS14.3 | Woodlands Farm, Wood Lane, Barkham | 15 |
| SS14.24 | Woodside, Blagrove Lane, Wokingham | 4 |
| | | 43 |

- 4.15 In order to calculate capacity, an average pitch size of approximately 625m² has been assumed based on the recommendation of the GTAA 2023 (paragraph 3.20). This pitch size is sufficient to accommodate hardstanding for two parking bays and a vehicle turning circle, a twin-unit chalet/mobile home, a touring caravan, an amenity building measuring 4m x 4.8m for each space, amenity space and a small garden area/play space.
- 4.16 This pitch size is considered to be desirable, but it is recognised that a number of existing pitches in the borough are of a smaller area whilst still providing adequate accommodation and amenity. The number of pitches is therefore ‘indicative’ and does not represent a fixed requirement for each site. Those proposing developments are encouraged to produce the most appropriate design-led solution, taking all relevant local and national policies, in arriving at a total pitch figure for their site. The design-led approach is not expected to be unnecessarily constrained by the indicative figure.
- 4.17 The allocation of the above sites for Gypsy and Traveller use would enable the delivery of 43 pitches. Taken together with permissions / expected permissions would contribute 51 pitches towards meeting the identified target, leaving a remaining requirement for 35 pitches.

Provision through strategic developments

- 4.18 The LPU requires strategic scale development to make appropriate onsite provision of Gypsy and Traveller pitches. For this purpose, strategic scale development is defined as that which delivers a minimum of 500 homes.
- 4.19 Strategic developments will be required to make provision equivalent of 1 pitch per 200 dwellings rounded to the nearest whole pitch e.g. a scheme for 500 dwellings would equate to 2.5 pitches, rounded to a requirement for 3 pitches. This approach is considered reasonable and proportionate, and facilitates the delivery of mixed communities. It is considered to be the most effective way of achieving the aim of national policy to promote peaceful and integrated co-existence between sites and the local community.

- 4.20 Priority will be given to onsite provision in the interests of creating inclusive mixed communities. The provision of pitches should be incorporated into the masterplanning of development proposals from an early stage. In rare cases, where onsite provision is not achievable due to genuine and demonstrable physical constraints on site, the Council will accept the provision of an equivalent financial contribution to facilitate off-site provision in lieu of direct provision, if it can be demonstrated that a suitable, available and achievable site (or sites) can be provided and made operational within an appropriate timescale.
- 4.21 As explained at paragraph 9.97 of the Proposed Submission Plan, the council will be alert to, and not permit any benefit to be gained from, the subdivision of larger sites to circumvent provision. Sites in the same ownership, or where an ownership relationship can be proven, will be treated as a single planning unit/site and if the overall gross quantum of housing reasonably capable of being achieved is 500 or more dwellings, the applicant will be expected to provide Gypsy and Traveller pitches in accordance with the set standard.

Table 5 – Strategic site allocations required to provide pitches

| Allocation | Number of dwellings | Of which GRT pitches |
|--|----------------------------|-----------------------------|
| Loddon Valley Garden Village | 3,930 | 20 |
| South Wokingham SDL extension | 1,150 | 6 |
| Arborfield Garrison SDL additional dwellings | 900 | 5 |
| | | 31 |

- 4.22 For the avoidance of doubt, the requirement from strategic sites relates to the overall quantum of housing they are expected to deliver, rather than the delivery expected within the plan period. Accordingly, the requirement of 20 pitches at Loddon Valley Garden Village is based on its overall expected delivery of 3,930 dwellings rather than the 2,700 expected to be delivered to 2040. This reflects that Gypsy and Traveller sites are much quicker to deliver and therefore all the pitches can comfortably be completed in the plan period, compared to the bricks and mortar housing whose delivery profile is influenced by a range of factors. The approach also reflects the importance of meeting the specific pressing need for a specialist type of accommodation within the plan period.
- 4.23 The 900 additional dwellings being enabled by the Proposed Submission Plan at Arborfield Garrison SDL comprises 600 dwellings at land known as Barkham Square and 300 dwellings by optimising development density at land currently occupied by Arborfield Studios. The requirement for the provision of 5 pitches is based on the full 900 dwellings, recognising that whilst this will be delivered across two sites, these are located adjacent to each other and are being promoted by the same developer,

meaning they would satisfy the relationship test detailed at paragraph 9.97 of the plan.

- 4.24 Delivery of pitches as part of strategic development, together with permissions / expected permissions and specific site allocations, would contribute 82 pitches towards meeting the identified pitch target. This leaves a very modest remaining requirement for an additional 4 pitches.

Windfall applications

- 4.25 National planning policy allows for local planning authorities to consider windfall sites in their housing land supply. Paragraph 72 of the NPPF 2023 states:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

- 4.26 The PPTS is silent on windfall development, but Paragraph 11 supports criteria-based policies to provide a basis for decisions on applications.
- 4.27 Policy H10: Traveller sites of the Proposed Submission plan is a criteria-based policy for the determination of applications. Policy H10 will guide proposals for Gypsy and Traveller use that come forward on sites over the plan period.
- 4.28 Policy H10 is an evolution of, and supersedes, Policy TB10: Traveller Sites contained within the adopted Managing Development Delivery Local Plan (2014) (MDD). Existing criteria-based policy TB10 has facilitated a reliable source of supply since the adoption of the MDD. Table 6 below details the number of pitches that have been approved against the current criteria-based policy.

Table 6 – Permanent pitches approved / allowed since MDD adoption⁵

| Site | Planning reference | Net additional pitches | Decision Date |
|------|--------------------|------------------------|---------------|
| | | | |

⁵ Permissions marked with an * represent permissions which have lapsed, despite the Council’s best efforts to facilitate extra pitches. Permission marked with ** represents a site with a recommendation to grant but formal decision pending subject to legal agreement.

| | | | |
|---|-----------------|---|------------------------|
| Wally's Mobile Home Park, Charvil | F/2014/2041 | 2 | 16.04.15 |
| Belvedere | F/2014/1680 | 1 | 02.06.15 |
| Hogwood Meadows | VAR/2014/2421 | 2 | 30.07.15 |
| 166 The Promise | VAR/2014/1945 | 2 | 10.09.15 |
| Highfield (plots 1-7, 10)* | F/2014/2032 | 7 | 02.11.15 |
| Old Kingsbridge | F/2014/2365 | 1 | 26.11.15 |
| Littlemoor Plot 1 | VAR/2014/2436 | 1 | 26.11.15 |
| Littlemoor Plot 2 | VAR/2014/2437 | 1 | 26.11.15 |
| Highfields (Plots 8 & 9)* | VAR/2015/1038 | 2 | 26.11.15 |
| Highfields (Plot 11) | F/2012/0276 | 7 | 26.11.15 |
| Wind in the Willows | 153360 | 1 | 28.04.16 |
| Hogwood | 163212 | 1 | 09.01.17 |
| Honeysuckle Lodge* | 171589 | 2 | 27.07.17 |
| Belvedere Park | 173022 | 2 | 28.11.17 |
| Land to the north West of Nelsons Lane | 152605 | 2 | 28.06.18 |
| Littlemoor Plot 1 | 173365 | 1 | 18.12.18 |
| Carters Hill* | 192012 | 3 | 23.09.19 |
| Belvedere Park | 192174 | 5 | 04.10.19 |
| Cartref Farm | 180072 | 1 | 01.11.19 |
| 166 The Promise Nine Mile Ride | 201143 | 4 | 28.01.21 |
| Honeysuckle Lodge and Pine Lodge | 203626 / 230606 | 5 | 28.06.21 / 20.06.23 |
| Woodside Caravan Park | 192128 | 3 | 03.09.21 |
| 23a Nine Mile Ride | 212274 | 2 | 05.08.22 |
| Land West of Twin Oaks | 223021 | 1 | 22.06.23 |
| Plot 10 Highfield Park** | 223669 | 4 | Pending |
| Dun Elm's Nelsons Lane | 241486 | 3 | 29/08/24 |

- 4.29 Table 6 shows that 66 pitches have been approved over the last 10 years. Of these, 15 pitches have lapsed and the 4 pitches at Plot 10 Highfield Park and 3 pitches at Dun Elm's are yet to be delivered, leaving a total of 44 pitches that have delivered over the past 10 years.
- 4.30 The current development plan does not contain site allocations for Gypsy and Traveller pitches. Delivery through windfall applications has therefore been the only mechanism for meeting need and maintaining the required land supply. Therefore, historic delivery rates are likely to be higher than future windfall supply. However, while the scale of windfall delivery is not certain, what is clear is that having a sound criteria based policy in place has proven to lead to a reliable source of supply. There is a high degree of confidence that the very modest shortfall of 4 pitches against need will be met through windfall development.

Protecting existing sites

- 4.31 Policy H10: Traveller sites states:

"3. Development proposals that would result in the net loss of existing pitches /plots, land allocated for pitches / plots, or land with planning permission for pitches / plots will only be supported when one or more of the following criteria are met:

- a) The pitch, plot or site is no longer suitable for such use and that alternative provision on a site that is of equal or better quality is provided; or*
- b) It is clearly demonstrated that there is no current or foreseeable future need for pitches or plots in the borough."*

- 4.32 The safeguarding of existing sites from being redeveloped for alternative use provides no net supply of pitches. However, it does ensure that pitches remain available to help meet the accommodation needs of future generations and prevents need being exacerbated through net loss of supply. For this reason, the LPU seeks to protect existing and new pitches or plots from being redeveloped or being used for other purposes unless specific requirements are met.

Alternative options that have been considered to meet need

- 4.33 The Duty to Cooperate: Statement of Compliance (2025) sets out in detail the approaches that have been made to surrounding authorities for assistance in

meeting unmet need. In summary, all nine surrounding authorities have confirmed that they are unable to assist in meeting any needs arising in Wokingham borough.

- 4.34 Additionally, consideration has been given to the release of Green Belt land. As detailed in Table 3, a promoted site comprising one pitch benefits from a 5 year temporary permission until October 2027 (Land opposite 136-144 Wargrave Road, permission 202499⁶) but is located in the Green Belt. An additional site, immediately south of that site, also benefits from temporary permission from one pitch for 5 years until November 2028 (Land opposite 130-144 Wargrave Road, permission 230310⁷). In both cases, the proposals were allowed on balance, given the need for pitches and for a temporary period to allow the LPU to further progress and facilitate the delivery of additional alternative sites. The scale of each site is such that they are unlikely to accommodate more than a single pitch each. Therefore, any contribution from releasing the sites from the Green Belt would be limited and not capable of amounting to exceptional circumstances in the case of these two particular site options available for Gypsy and Traveller provision.
- 4.35 Further, the GTAA 2023 makes some observations on potential sources of supply at paragraphs 6.37 to 6.45. This included a potential additional supply of pitches on existing sites of between 23 to 43 additional pitches. It is however important to recognise, as acknowledged in the GTAA 2023 itself (paragraph 6.38), that these pitches have been identified by residents and/or landowners giving their informal opinion. This did not involve any technical planning assessment. Officers have reviewed these suggestions, and do not consider they currently offer a demonstrable source of deliverable supply as required by national policy.
- 4.36 The GTAA 2023 also identified the regularisation of an existing 11 pitch site which benefitted from temporary permission. There is a live application (reference 242780) for the permanent use of these 11 pitches. The site is located within the Detailed Emergency Planning Zone around AWE Burghfield, and therefore there is no guarantee permission will be granted.
- 4.37 The GTAA 2023 finally identified 29 pitches authorised for Gypsy and Traveller use that were found to be occupied by non-Gypsy and Travellers. Due to the complexities of carrying out enforcement investigations into these pitches, balanced against the potential for making occupiers homeless, it is not considered that regularising the occupation of these pitches currently represents a demonstrably deliverable source of supply.

⁶ Details available here:

<https://planning.wokingham.gov.uk/FastWebPL/detail.asp?AltRef=202499&ApplicationNumber=202499&AddressPrefix=&Postcode=&KeywordSearch=&Submit=Search>

⁷ Details available here:

<https://planning.wokingham.gov.uk/FastWebPL/detail.asp?AltRef=230310&ApplicationNumber=230310&AddressPrefix=&Postcode=&KeywordSearch=&Submit=Search>

4.38 In summary, the plan proposes measures to deliver a significant number of pitches such that the remaining need is very modest and comfortably within the scale of historic windfall delivery. Delivery from windfalls is an appropriate basis from which to anticipate continued supply that is capable of meeting the very modest outstanding identified need. As such, the council is in a position where it is not reliant on surrounding local authorities for assistance and nor does it consider releasing land from Green Belt is justified.

Total supply of pitches

4.39 As summarised above, commitments and supply to be delivered by the Proposed Submission plan account for 82 pitches against a need of 86 pitches. The remaining need for 4 pitches is expected to be met and exceeded through windfall developments utilising criteria-based policy H10.

5. Five year land supply position

- 5.1 As set out above, the PPTS requires local planning authorities to identify and update annually a supply of deliverable sites sufficient to provide five years' worth of sites against need. This requirement relates to Gypsies and Travellers who meet the definition set out in Annex 1 and is separate from the housing supply that is required to be demonstrated by the NPPF.
- 5.2 The pitch target in H9 is informed by the GTAA 2023. The breakdown of need identified in the GTAA, and as set out in Table 1 and paragraph 3.4 above, is used as the basis for calculating the land supply position.
- 5.3 The council's updated assessment of the land supply position of Gypsy and Traveller pitches at the point of submission of the LPU is set out in Table 7 below. All permissions at the GTAA 2023 base date are accounted for in establishing the need, and the position is brought up to date based on known permissions and proposed allocations as of February 2025. The supply position is normally calculated at 31st March, and will continue to be in future years. This table provides a contextual update for the LPU taking account of delivery expected through the Proposed Submission Plan.

| Table 7 - Summary five year supply position at February 2025 | |
|---|------------------|
| a) Need from GTAA base date to monitoring year (April 2022 to March 2024) | 14 ⁸ |
| b) Completions April 2022 to March 2024 | 0 |
| c) Surplus(+) / shortfall(-) April 2022 to March 2024 | -14 |
| d) 5 year need from GTAA April 2024 to March 2029 | 27 ⁹ |
| e) 5 year monitoring requirement April 2024 to March 2029 | 41 ¹⁰ |

⁸ The GTAA identifies a need in the first 5 year period (2022/23 – 2026/27) of 35 pitches i.e. 7 pitches a year. The need for the year 2022/23 to 2023/24 is therefore 2x7 pitches.

⁹ The GTAA identifies a need in the first 5 year period (2022/23 – 2026/27) of 35 pitches i.e. 7 pitches a year. Beyond the initial 5 year period, the need is identified as 51 pitches over the remaining 13 years (2027/28 – 2039/40). This is further broken down into periods, and for the five years 2027/28 – 2031/32 a need of 15 pitches is identified i.e. 3 pitches a year. The identified need of 27 therefore comprises 21 pitches in the years 2024/25 – 2026/27 and 6 pitches for the years 2027/28 – 2028/29.

¹⁰ The shortfall of 14 pitches at c) + 5 year need at d) (27 pitches) = 41 pitches.

| | |
|--|--------------------|
| f) Annual monitoring requirement April 2024 to March 2029 | 8.2 ¹¹ |
| g) Deliverable supply April 2024 to March 2029 | 31 |
| h) Total deliverable housing supply in years for period April 2024 to March 2029 | 3.78 ¹² |

5.4 At the point of publication of the Proposed Submission Plan the council is unable to demonstrate a 5 year supply of deliverable pitches against the locally set target in the Proposed Submission Plan, with the position standing at 3.78 years.

5.5 However, this is due to the timing that new pitches are expected to come forward. It is anticipated that at the point of adoption of the plan, a supply in excess of 5 years will be demonstrable and that this will be maintained moving forwards. Windfall developments will be capable of topping up and ensuring supply is maintained later in the plan period.

6. Conclusion

6.1 This paper provides background and evidence to support the Proposed Submission LPU policy approach to the provision of Gypsy and Traveller accommodation. It has set out the relevant planning policy, guidance and legislation, as well as need and supply.

6.2 The incorporation of Policies H9 and H10 in the Proposed Submission Plan will ensure that the council meets its Gypsy and Traveller accommodation needs over the plan period.

6.3 The council will monitor this position through its annual update to the land supply position.

¹¹ 41/5 years = 8.2 pitches.

¹² 31/8.2 = 3.7804 (rounded in table).