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**Leicester Local Plan
2020 to 2036**

Gypsy and Traveller Topic Paper

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Submission document
September 2023

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1. Introduction

1.1 A key element of the new Local Plan is to allocate sites for different uses where a need has been demonstrated, including gypsy & traveller pitches and plots for travelling showpeople. This topic paper sets out what we are required to consider when planning for gypsies, travellers and travelling showpeople, the approach that we have taken in gathering evidence of need, and how we have assessed the suitability and deliverability of site options.

2. Policy

National Policy

2.1. In 2015 the Government published an updated “Planning Policy for Traveller Sites” (PPTS) setting out Local Planning Authorities requirements to plan for Gypsies & Travellers. The national planning policy on Gypsies & Travellers needs to be read in conjunction with the National Planning Policy Framework (NPPF), which was last updated in 2021.

2.2. The PPTS confirms that Local Planning Authorities (LPAs) should set pitch targets for Gypsies & Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs of Gypsies & Travellers. To achieve this, LPAs should, in producing their plan:

- Identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets
- Identify a supply of specific, developable sites or broad locations for growth, for year six to ten and, where possible, for years 11-15
- Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area. (local planning authorities have a Duty to Cooperate (DtC) on planning issues that cross administrative boundaries)
- Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density
- Protect the local amenity and environment

2.3. The PPTS sets out the definition of Gypsies & Travellers as follows:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

2.4. In determining whether persons are “gypsies & travellers” for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

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

2.5. The PPTS sets out the definition of travelling showpeople as follows:

“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies & Travellers as defined above.”

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

Leicester City Core Strategy (2014)

2.7. In July 2014 the council adopted its Core Strategy as the first part of its Local Plan. It was adopted after the introduction of the NPPF and PPTS and includes detailed criteria (see Core Strategy Policy CS09) for determining planning applications for gypsy & traveller Pitches. Core Strategy Policy CS09 also sets the district’s pitch and plot requirements up until 2026 and was informed by the East Midlands Regional Spatial Strategy.

3. Local Evidence of Need

3.1. Please note that the Council will be seeking to update the gypsy & traveller evidence base upon plan review. This updated evidence will take into account the appeal between the Secretary of State for the Home Department v Lisa Smith 2023.

Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017)

3.2. Our initial evidence of need is set out in our [Gypsy & Traveller Accommodation Assessment \(GTAA\) 2017](#) which was undertaken by Opinion Research Services (ORS).

3.3. The GTAA (2017) identified 3 public gypsy & traveller sites with a total of 37 pitches and 1 travelling showpeople yard, with 19 plots. The GTAA was based on primary data gathering in the form of interviews with gypsy & traveller families with 33 interviews achieved representing a response rate of 59%.

3.4. Following the interviews, future needs were calculated derived from those households who met the planning definition as well as a separate need figure for those who did not meet the planning definition. The methodology and calculations are explained in the GTAA 2017. In addition, an assumed figure was derived from those undetermined households/individuals (i.e. where an interview was not achieved). The need for gypsies & travellers who met the planning definition was for 6 pitches between 2016 and 2036.

3.5. The GTAA also identified a need for 21 pitches from those households who did not meet the planning definition and potentially up to 1 additional pitch from undetermined households where interviews were not achieved.

3.6. For travelling showpeople, the GTAA identified no current or future additional need based upon the 5 households that meet the planning definition of travelling. The study also acknowledges a potential addition need of up to 2 plots based upon the 12 unknown households who weren't interviewed for various reasons.

Leicester City Council Gypsy & Traveller Accommodation Assessment Addendum (2019)

3.7. The [addendum report](#) reviewed transit provision within the city. It took into account revisions to the way in which ORS model the supply of pitches, and changes to the ORS national proportion of households that meet the planning definition of gypsy & traveller.

3.8. After completing more interviews across the country, the consultants concluded that the likely proportion of undetermined households that meet the planning definition is 25% (formerly 10%), meaning that of the undetermined households (those not interviewed) 25% are likely to meet the planning definition and 75% are likely to not. This has been applied in determining the need for Leicester.

3.9. Data from the Leicestershire Multi Agency Traveller Unit (MATU) on unauthorised encampments across Leicestershire and Leicester City, suggests need for 1 transit site with a minimum capacity of 12 caravan spaces.

3.10. The GTAA Addendum identified an increase of need by 2 pitches from undetermined households, this would bring the overall need to 3 additional pitches when also taking the GTAA 2017 into account.

3.11. For undetermined households the need of 3 pitches is split in two: 25% (1 pitch) is required for undetermined households that meet the planning definition; and 75% (2 pitches) are required for undetermined households that do not meet the planning definition.

3.12. The GTAA Addendum also identified a decrease of need by 2 pitches from households that did not meet the planning definition, bringing the overall need to 19 additional pitches when taking the GTAA 2017 into account.

3.13. In summary, the results of the GTAA Addendum do not change the overall need of 28 pitches identified in the GTAA 2017 for the period 2016-2036. The Addendum does, however, identify the need for 1 transit site consisting of 12 pitches.

3.14. Leicester City's need for gypsy & traveller provision for the years 2016-

2036 is therefore as follows:

Status	Total pitches
Meets planning definition (including undetermined) (Permanent provision)	$(6+1) = 7$
Does not meet the planning definition (including undetermined)	$(19+2) = 21$
Travelling showpeople	2
Transit	12

4. Draft Plan for Consultation (2020) – Regulation 18

4.1. Policy SL02 of the Draft Plan (Regulation 18) for Consultation (2020) proposed the allocation of 7 permanent pitches at Strategic Site 1: Former Western Park Golf Course (Site 702). These are identified for households with a need within the plan period, who meet the planning definition.

4.2. Policy H012 forms a criteria-based policy to meet the need for gypsy & traveller provision beyond the first 10 years of the plan period via the development management process. This policy is also intended to apply to applications addressing the 7 allocated permanent pitches at Site 702 (Former Western Park Golf Course), the need for 12 caravan spaces in respect of transit provision, and the 2 additional showpeople plots.

4.3. The table below, taken from the Draft Plan (2020) outlines the city's need for gypsy & traveller pitches.

Site Status	GTAA				HNA				Total
	2016-21	2021-2026	2026-31	2031-36	2016-21	2021-2026	2026-31	2031-36	
Met Planning Definition (+25% undetermined) (Permanent provision)	4	1	2	0	0	0	0	0	7
Did not meet Planning Definition (+75% undetermined)	0	0	0	0	9	3	4	5	21
									28

4.4. The Draft Plan (2020) states that the need for 21 pitches coming from gypsy & traveller households that did not meet or are unlikely to meet the planning definition will be assessed through the Local Housing Needs Assessment.

Representations

4.5. Policy H012 (Gypsy, Traveller & Travelling Showpeople) received 12 representations during the Regulation 18 consultation. Apart from welcoming the inclusion of the policy, other comments included the need to update the GTAA; increasing the number of pitches over the plan period; and ensuring that gypsies & travellers have equal access to the city's services. The Housing

Development Team (Leicester City Council) also recommended that permanent and transit pitches are not co-located.

4.6. 541 representations were received regarding site 702 (Former Western Park Golf Course), of which 75 relate to the gypsy & traveller pitch allocation at the site. Comments include that the council should prioritise expansion of existing gypsy & traveller sites. There was support for the allocation from Harborough District Council, who also suggested the inclusion of transit provision.

Gypsy & Traveller Initial Site Selection Paper (2020)

4.7. Forming part of the evidence base for the Draft Local Plan at Regulation 18, the 'Gypsy & Traveller Initial Site Selection' Paper explains the objectively assessed need for new gypsy & traveller pitches during the plan period. It also documents which sites have been considered to accommodate the new pitches.

4.8. The purpose of the site selection paper assesses the suitability and deliverability of these sites against key criteria (e.g., the impact of historic environment, highways access, site within the flood zone etc.). In addition, the paper examined the sites capacity to accommodate additional pitches. The site selection paper assessments and findings have been directly used to inform which of the sites have capacity to accommodate this need, and as such, are proposed for allocation.

4.9. It should be noted that no private site owners have come forward to promote their site for gypsy & traveller pitches. Leicester City Council, as landowner, came to the decision that it would be preferred, at Regulation 18 stage, to propose that part of site 702 be made available for the provision of the required number of pitches.

5. Leicester Local Plan Submission (Regulation 19 publication) Plan (2023)

5.1. After considering comments raised at Regulation 18 consultation, the Submission (Regulation 19 publication) Plan (2023) retained the permanent pitch allocation in Policy SL02 for 7 permanent pitches at site 702 (Former Western Park Golf Course). This is to meet the need of households who meet the planning definition as specified within the GTAA. Added is some minor wording to link the gypsy & traveller allocation to Policy Ho12.

5.2. Policy Ho12 continues to be the criteria-based policy through which applications concerning gypsy & traveller pitches will be assessed. There is now reference to Policy DQP06 with regards to impact on the amenity of local residents.

5.3. With regards to the identified transit need, the submission Plan proposes to meet the needs across two proposed employment allocations, these sites being:

- Strategic Site 5 (Site 464: Beaumont Park) – Policy SL06
- Site 687 (Thurcaston Road/Hadrian Road Open Space) – Policy E01

5.4. The methodology for site selection is outlined below.

5.5. Both sites are allocated to meet the need for the 12 transit caravan spaces.

Gypsy & Traveller Transit Site Selection Paper (2022)

5.6. Following Regulation 18 consultation a Gypsy & Traveller Transit Site Selection Paper (2022) was undertaken to look at where transit sites could be accommodated. The purpose of the site selection paper was to assess the suitability and deliverability of these sites against key criteria (e.g. the impact of historic environment, highways access, flood zones etc.). In addition to the assessment against key planning considerations, the paper examined the sites capacity to accommodate additional pitches. The site selection paper assessments and findings have been used directly to inform which of the sites have capacity to accommodate this need, and as such, are proposed for allocation.

5.7. Following an initial stage 1 desk top assessment the site selection paper discounted 33 sites (see Table 1 of the site selection paper for a list of sites) from the detailed stage 2 assessment. The reasons for exclusion include:

- Flooding
- Environmental Concerns
- Lack of Privacy
- Reasons relating to wider site assessment criteria (loss of playing fields, local wildlife sites, ecology, archaeology, loss of recreational & play spaces)

5.8. A further 28 sites (see Table 2 of the site selection paper for a list of sites) were not taken beyond stage 2 after consideration of specific gypsy & traveller needs. Criteria include:

- Physical characteristics of the site
- Locational requirement
- Suitable access
- Management effectivity

5.9. Stage 3 discounted 5 sites that were no longer available for development. For example, a planning application may have been submitted for an incompatible development, or the landowners may have withdrawn the site from the process.

5.10. A final 13 sites were discounted at stage 4 due to a combination of proximity to other gypsy & traveller sites and housing, site in private ownership and other development preferences. This resulted in the following 2 sites being selected as being deliverable:

- Site 464 Beaumont Park
- Site 687 Thurcaston Road/Hadrian Road Open Space

5.11. [The Gypsy & Traveller Transit Site Selection Paper \(2022\)](#) can be viewed here.

Representation Summary

5.12. Several representations were made on Policy SL02 (Strategic Site 1: Former Western Park Golf Course) during the regulation 19 consultation specifically regarding the permanent gypsy & traveller pitch allocation. Comments received noted an established gypsy & traveller site nearby and highlighted an application which had previously been refused.

5.13. Policy SL06 (Strategic Site 5: Beaumont Park) received a multitude of representations objecting to the allocation of transit provision at Site 464 (Beaumont Park). Furthermore, several comments raised the point that transit provision at this site was not included within the regulation 18 consultation. Northwest Leicestershire District Council were supportive of the allocation but noted that there was limited information about the deliverability, site selection and master-planning of the site.

5.14. Policy H12 garnered minimal response, one representation was made in support of the policy, and another questioned the ambiguity of some wording.

5.15. Similar issues to that of policy SL06 were raised in the representation regarding Site 687 (Thurcaston Road/Hadrian Road Open Space) with the addition of highlighting a nearby established gypsy & traveller site. Further objections related to questions of incompatibility between gypsy & traveller use with employment and allocating transit provision without substantial evidence.

5.16. The council's responses to comments raised during the regulation 19 consultation can be found in Appendix 4 Schedule 2 of the Regulation 22 Statement of Consultation.

6. Delivering Gypsy & Traveller Pitches

6.1. As stated in the site selection papers, Leicester City Council is the landowner for the allocated sites. This provides a high level of confidence over the delivery of the pitches.

6.2. The council will utilise procurement methods in conjunction with housing delivery at Former Western Park Golf Course. During this process the council will work closely with development partners to create a masterplan for the site, in which land will be allocated for the 7 permanent pitches. This allocation will form part of an outline application for the gypsy & traveller uses. Lead developers will likely be tasked with providing a serviced site for these land uses, after which final delivery, led by the city council's housing division, will be commissioned through a contractor.

6.3. With regards to transit provision, the city council is intending to deliver both sites that have been allocated. The need for 2 Travelling Showpeople pitches will be accommodated on the existing Bath Lane site.

6.4. All applications concerning needs for gypsy & traveller provision will be assessed against Development Management Policy Ho12. This approach is intended to allow for more flexibility about the specifics of the gypsy & traveller provision at the allocated sites (as well as applications that come forward outside of the site allocations), whilst also providing certainty with regards to the amenity of future residents for which the pitches are intended and local residents in proximity to the allocations.

6.5. The Infrastructure Assessment (2023) estimates a cost of £875,000 for overall infrastructure required to deliver the 7 permanent pitches at Former Western Park Golf Course. This is based upon the provision of similar facilities elsewhere.

6.6. It is presumed that the primary source of funding will be the council's capital programme from future development land scales. Once delivered, the sites will be managed by housing division and will be sustained by pitch rents similar to current working gypsy & traveller sites.

6.7. The city currently has 3 permanent sites totalling 37 pitches. These sites are: Red Hill Nook (10 pitches), Greengate Nook (6 pitches) and Meynell's Gorse (21 pitches). Both Red Hill Nook and Greengate Nook were opened in 2015 almost doubling the number of pitches in the city.

6.8. The council is confident that the identified need for gypsy & traveller pitches will be met over the plan period. Leicester City Council has a good track record of pitch delivery and is committed to meeting the identified need for gypsy & traveller pitches on its own land.

