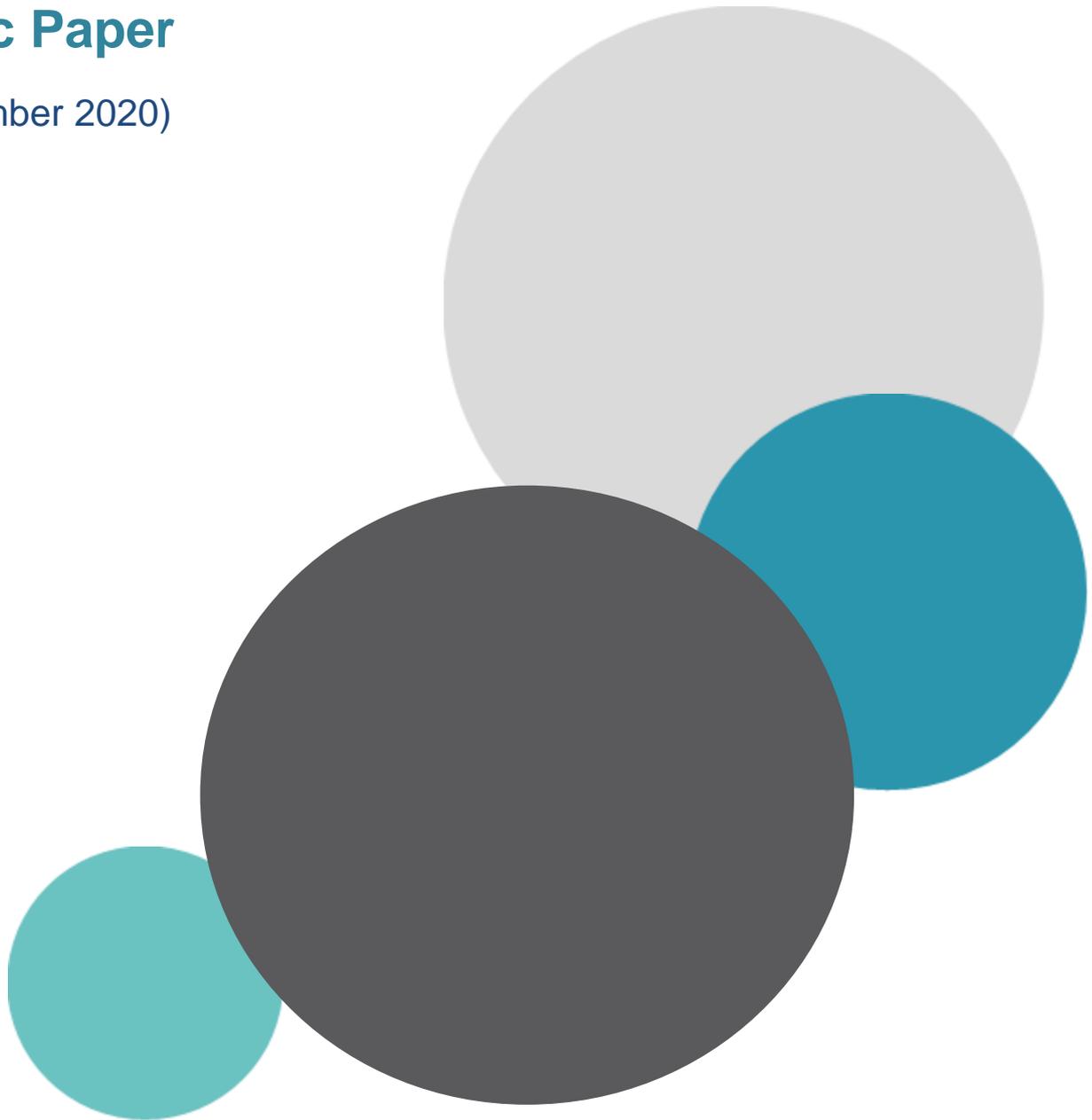


Gypsy and Traveller Site Allocations

Topic Paper

(November 2020)



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1.0 Introduction

- 1.1 This Topic Paper explains the Council’s approach to establishing the number of additional gypsy and traveller pitches to be allocated in Local Plan Part 2 (LPP2). The Topic Paper also explains how the Council decided which sites should be allocated for gypsy and traveller pitches in the Pre-Submission version of LPP2.
- 1.2 For the purposes of LPP2 the Council has used the definition of a gypsy and traveller as that provided in the Planning Policy for Travellers Sites (PPTS) (2015) of gypsy and travellers.
- 1.3 The PPTS requires local planning authorities to use a “robust evidence base to establish accommodation needs to inform preparation of local plans and make planning decisions”. Policy AHN4 of the Waverley Local Plan Part 1 (LPP1) sets out the Council’s approach to plan making and decision making in respect of gypsy and traveller accommodation. However, LPP1 does not allocate any sites for additional gypsy and traveller pitches. This is to be addressed through LPP2.

2.0 Establishing the Future Need for Gypsy and Traveller Pitches in Waverley

- 2.1 The Council has used the Waverley Gypsy and Traveller Accommodation Assessment (TAA) as the starting point for establishing the number of additional pitches that need to be allocated for in LPP2. The TAA was prepared by Opinion Research Services (ORS) and published in 2017 and later updated in 2018. It has a base date of March 2017 and sets out the number of additional pitches required at the base date to meet the need arising from the existing gypsy and traveller community within the Borough.
- 2.2 As part of preparing the TAA, ORS approached each gypsy and traveller household in Waverley to establish whether or not they met the planning definition of a gypsy and traveller and to understand their future accommodation needs. This data was then used to establish the need for additional gypsy and traveller pitches up to 2032.
- 2.3 At the base date of the TAA the existing gypsy and traveller sites were:

Table 1 – List of existing gypsy and traveller sites in Waverley at the base date of 1 April 2017

Site	Authorised Pitches	Unauthorised Pitches
The Willows, Runfold	10	
7 Plaistow Road (adjacent to Burnt Hill)	3	
9 Burnt Hill, Dunsfold	10	

Site	Authorised Pitches	Unauthorised Pitches
Bridge View, Old Bridge Road	8	
Hill Tops, Cranleigh	3	
Land East of A31 River Lane, Farnham	1	
Land south of The Kiln Hall, Badshot Lea	1	
Land west of Badshot Farm, Lane, Badshot Lea	1	
Land West of Knowle Lane, Cranleigh	1	
Lydia Park, Cranleigh	20	
Monkton Farm, Monkton Lane	1	
New Acres, Cranleigh	35	
Pollingfold Place, Ellens Green	1	
Rodborough Hill, Park, Milford	17	
Rushett Common, Bramley	2	
Tongham Road, Runfold	1	
Pollingfold Place, Ellens Green		8
Rosewood, Brook		2
Land adjacent to 1 East View Cottages, Alfold		1
Old Mill Farm, Thursley		1
Total	115	12

2.4 The TAA found that at the base date there was a need for 27 additional pitches for gypsy and traveller households that met the definition set out in the PPTS. The additional pitches were required in the following years.

Table 2 – The pitch requirement for households that meet the planning definition.

Years	Number of Pitches Required
2017-22	19
2022-27	4
2027-32	4
Total	27

2.5 In addition to the 27 pitches for households that met the planning definition of a gypsy and traveller the TAA also identified a need for up to 24 pitches to meet the needs of households where it was unknown whether or not they met the planning definition. These additional pitches were required in the following years.

Table 3 – The pitch requirement for households where it is unknown whether they meet the planning definition.

Years	Number of Pitches Required
2017-22	13
2022-27	5
2027-32	6
Total	24

2.6 The Council's approach has been to allocate land in LPP2 to meet 66% of the need arising from households where it was unknown if they met the planning definition. The decision to accommodate 66% of the unknown need was based on the TAA household survey. This concluded that the proportion of households in Waverley that met the planning definition was 62%. The national average of households that meet the planning definition is 10% (based on statistics from ORS). As the number of households that met the planning definition is higher than the national average, the Council decided to apply the same percentage of 62% to the unknown households and add a further 4% as contingency. This means that the Council is seeking to allocate 16 pitches to meet the unknown need (i.e. 66% of 24) in addition to the meeting the need arising from households that meet the planning definition.

2.7 Based on meeting all the need arising from households that meet the planning definition and 66% of the households where it is unknown whether they meet the definition there was a need at the TAA base date to allocate land for a total of 43 pitches across the following years.

Table 4 – The total number of pitches needed at the GTAA base date.

Years	Number of pitches to the meet the known need	Number of pitches to meet the unknown need	Total
2017-22	19	9	
2022-27	4	3	
2027-32	4	4	
Total			43

2.8 Local Plan Part 2 has a base date of 1 April 2020. As this is different to the base date of the TAA (March 2017), the number of pitches that need to be allocated for in LPP2 is different to the figure stated above. The role of this Topic Paper is to explain why the Council needs to allocate land for 17 pitches.

3.0 Planning Permissions Granted Since the TAA Base Date

3.1 Since the TAA was published planning permission has been granted for a number of additional gypsy and traveller pitches in the Borough. These have

been counted towards meeting the need identified in the TAA, thereby reducing the number of pitches that need to be allocated for in LPP2.

- 3.2 Since 1 March 2017, planning permission has been granted for 29 additional pitches within Waverley. A list of the planning permissions can be found at Appendix 1. The reasons why not all the permissions can be used to offset the number of pitches that need to be allocated for in LPP2 is set out below.
- 3.3 At the TAA base date the 8 pitches at Pollingfold Place comprised households where it was unknown whether or not they met the planning definition. This was because the Council's consultants, ORS were unable to interview the occupants of the site in 2017. The site has subsequently been the subject of a planning appeal for seven pitches where it was established that the households occupying the 7 pitches met the planning definition. This means that the seven pitches can move from the unknown category to the known category. Because planning permission has been granted for these seven pitches it is not necessary for LPP2 to allocate any land to meet this need. However, there will be a need to allocate land for two additional pitches to accommodate the future need arising from household growth from the existing households on site. This information has only come to light during the recent planning appeal for the site where details of the occupants of the site was provided. As the households on the site meet the planning definition it is necessary to allocate land for an additional two pitches during the plan period. One pitch is required between 2022 and 2027 and a second pitch is needed between 2027 and 2032. These additional 2 pitches have been added to the overall number of gypsy and traveller pitches that need to be allocated for in LPP2.
- 3.4 In addition, Land adjacent to 1 East View Cottages has obtained planning permission for 1 pitch since the base date of the TAA. When the TAA was carried out ORS were unable to interview the occupants of the site and therefore, it was unknown whether or not they met the planning definition. The appeal decision confirms that the household living on the site meets the definition within the PPTS. This means that the number of pitches for households where it is unknown if they meet the definition can be reduced by 1 pitch. However the number of pitches for households that meet the definition does not need to be increased by 1 pitch because planning permission has been granted for 1 pitch; in effect cancelling out the need.

Table 5 – Table providing a breakdown of the components of need

Years	2017-22	2022-27	2027-32	Total
Number of pitches for those who meet the definition (at the GTAA base date)	19	5 ¹	5 ²	29 ³
Number of pitches for those where it is unknown whether they meet the definition	5 ⁴	5	6	16 ⁵
66% of the pitches for those where it is unknown whether they meet the definition ⁶	3	3	4	10
Total of the number of pitches for households that meet the planning definition and 66% of the households where it is unknown if they meet the planning definition.	22	8	9	39

3.5 The table above confirms that at the LPP2 base date of 1 April 2020 there was a need for an additional 39 pitches to meet all of the need from households that meet the planning definition and 66% of the need where it is unknown whether the household meets the planning definition. The table below uses the 39 pitches as a starting point. There is a need during the plan period for an additional pitch at Bridge View, Runfold to accommodate the need arising from the existing households on site. The partially implemented planning permission at Bridge View has the potential to accommodate the additional pitch required thereby, removing the need to allocate land in LPP2.

¹ 1 additional pitch has been added to the figure in this column to reflect the Pollingfold appeal decision.

² 1 additional pitch has been added to the figure in this column to reflect the Pollingfold appeal decision.

³ The figure in this column has been adjusted to take account of the 2 additional pitches required as a result of the Pollingfold appeal.

⁴ The figure in this column has been adjusted by removing 7 pitches to reflect that Pollingfold has been granted permission and the 1 pitch at Land adjacent to 1 East View Cottages.

⁵ The figure in this column has been adjusted to reflect the 7 pitches at Pollingfold and 1 pitch at Land adjacent to 1 East View Cottages.

⁶ The figures in this row have been calculated based on the numbers in the row above.

3.6 When taking into account the pitches that have been granted planning permission since the TAA base date, this equates to a need for 17 pitches to be allocated through LPP2.

Table 6 – The overall number of pitches that need to be allocated for LPP2.

Years	2017-22	2022-27	2027-32	Total
Total of the number of pitches for households that meet the planning definition and 66% of the households where it is unknown if they meet the planning definition.	22	8	9	39
Minus the number of pitches with planning permission at the base date but adjusted to meet the need arising from the site (this is the Bridge View Site)	1	-	-	1
Minus the number of pitches which have been granted planning permission since the GTAA base date	21 ⁷	-	-	21
Sub Total	0	8	9	17

4.0 Site Allocation Process

4.1 The Council's approach to allocating gypsy and traveller pitches is set out in Policy AHN4 of LPP1. The policy sets out a sequential approach which is as follows:

“A sequential approach will be taken to identifying sites for Travellers and Travelling Showpeople within part 2 of the Local Plan: Site Allocations and Development Management Policies in the following order:

- *Providing additional pitches within available existing authorised sites*
- *Suitable extensions to available existing sites*

⁷ This figure does not include the 7 pitches permitted at Pollingfold Place or 1 pitch at Land adjacent to 1 East View cottages.

- *Use of available land within settlements or other available and suitable brownfield and outside settlements; and*
- *Other available and suitable land that does not fall within the above three categories*

Traveller sites in the Green Belt will not be supported, except in very special circumstances.

Rural Exception Sites solely for affordable Gypsy, Travellers and Travelling Showpeople sites will be considered in accordance with Policy D of the Planning Policy for Traveller Sites.

Allocations or proposals for permanent and transit sites for Gypsies, Travellers and Travelling Showpeople will only be permitted if:

- *Safe and convenient vehicular and pedestrian access to the site can be provided;*
- *There is easy and safe access to the strategic road network and the site does not generate traffic of an amount or type inappropriate for the roads in the area;*
- *The site is able to accommodate on site facilities for the parking and manoeuvring of vehicles and storage, play and residential amenity space*
- *The site is located within a reasonable distance of local facilities and services including schools and health facilities*
- *The site does not have an unacceptable impact on the physical and visual character of the area or on the amenities of neighbouring land uses*
- *The site is capable of being provided with essential services; and*
- *It accords with other policies in the Plan”*

4.2 The Council is proposing to allocate land for 17 pitches in LPP2. When considering which sites to allocate, the Council used the sequential approach outlined in Policy AHN4 of LPP1 by first considering sites which constituted an intensification of existing gypsy and traveller sites.

4.3 Due to the number of pitches needed during the plan period and the number of sites which have been promoted to the Council through the various Call for Sites, it was unnecessary for sites that represent extensions to existing sites to be considered. In effect, the Council is able to meet the need through allocating sites that represent intensifications and a change of use. The Sustainability Appraisal (SA) for LPP2 states that in relation to Gypsy and Traveller sites, it is considered that, on the whole, the intensification of use of Gypsy and Traveller sites represents a more sustainable option than

expanding existing sites, or creating new sites, as it allows for avoidance of effect. While there would still be sustainability issues relating to intensification of use, for example increased population density leading to increased water demand, issues such as this would likely occur anyway through development of new sites.

4.4 The proposed gypsy and traveller site allocations are:

Table 7 – Sites allocated for gypsy and traveller pitches in LPP2

Site Name	Net Number of Additional Pitches
Old Stone Yard, Runfold	3
Land South of Kiln Hall, Badshot Lea	3
Land off Badshot Lea Road, Farnham	2
Monkton Farm, Farnham	5
Land at Knowle Lane, Cranleigh	1
Burnt Hill, Plaistow Road, Godalming	3
Total	17

Old Stone Yard, Runfold

4.5 This is an existing gypsy and traveller site in Runfold. Planning permission was granted on appeal in 2012 for the change of use of the land to provide 1 gypsy and traveller pitch (LPA Ref: WA/2011/1571). At the base date of 1 April 2020, there was a pending planning application for the provision of additional pitches on the site (LPA Ref: WA/2019/1021).

4.6 The principle of having a gypsy and traveller site in this location has already been established by virtue of the fact it is already a consented site. The proposed site allocation represents an intensification of the existing use. Under Policy AHN4 of LPP1 providing additional pitches within available existing authorised sites represents the first tier in the sequential approach to allocating gypsy and traveller sites.

4.7 The site is not located within the Green Belt. As part of considering the current planning application, Surrey County Council Highways has been consulted on the planning application. They have not raised any highway concerns that cannot be overcome. Allocating the site for additional gypsy and traveller pitches would meet the first and second criteria in LPP1 Policy AHN4 regarding site specific requirements.

4.8 The plans submitted in support of the planning application demonstrate how on site facilities for parking and manoeuvring of vehicles and storage, play and residential amenity space can be accommodated on site. Thereby, demonstrating how the site meets the third criteria in LPP1 Policy AHN4 regarding site specific requirements.

- 4.9 Although Runfold does not have a primary and secondary school, there are a number of schools within a few miles of the site. The nearest medical facilities can be found in Farnham and Aldershot together with retail facilities.
- 4.10 It is not considered that the intensification will have an unacceptable impact on the physical and visual character of the area or the amenities of neighbouring land uses as the site is well screened. As the site is an existing gypsy and traveller site the precedent has been set in terms of providing essential services for future occupants of the site. The site has been considered within the Sustainability Appraisal (SA) for LPP2. The SA concludes that one major adverse impact in terms of the site's proximity to services and infrastructure.

Land South of Kiln Road, Badshot Lea

- 4.11 The site is an existing gypsy and traveller site with planning permission for 1 gypsy and traveller pitch granted in 2011 (LPA Ref: WA/2011/1440). At the base date there was a pending planning application for additional pitches on the site (LPA Ref: WA/2019/1022).
- 4.12 The principle of a gypsy and traveller use on the site has been established by the existing consented use of the site for gypsy and traveller accommodation. The site measures 0.4 hectares in size and comprises one mobile home and hard standing. Whilst there are some residential properties located to the south and west of the site, the area is rural in character and open in appearance with much of the surrounding land in agricultural use. The area on the opposite side of the road has some significant development proposals, including one site with planning permission granted for 69 dwellings. To the north of the site is a model car racing track.
- 4.13 The site lies outside the Farnham Built Up area Boundary and is located within the Farnham-Aldershot Strategic Gap. The landowner submitted a proposal to the Council's Call for Sites in 2018 to further intensify and extend the current gypsy site.
- 4.14 There is currently a pending planning application for the intensification of the existing use on the site. Surrey County Council Highways have commented on the application and have raised no objection to the proposals from a highways perspective. The Council is satisfied that the site can accommodate on site facilities for the parking and manoeuvring of vehicles and storage, play and residential amenity space.
- 4.15 The site is located within a reasonable distance of local facilities and services including schools and health facilities.
- 4.16 As the site is an existing gypsy and traveller site, the precedent has been set in terms of providing essential services for future occupants of the site. The

site has been considered within the SA for LPP2. The SA concludes that “No Major Adverse effects have been identified but there are some moderate adverse effects in terms of its location within or close to constrained areas .

Land off Badshot Lea Road, Farnham

- 4.17 The site is an existing gypsy and traveller site accommodating 1 pitch and was granted planning permission at appeal in 2014 (LPA Ref: WA/2013/0667). The site is located on the west side of Badshot Farm Lane immediately south of Squires Garden Centre, There is a mixture of commercial, retail, residential, leisure and agricultural uses in the immediate vicinity and along Badshot Farm Lane. The landowner submitted a proposal to the Council’s Call for Sites.
- 4.18 Allocation of the site represents an intensification of an existing gypsy and traveller site. The County Council has confirmed that the allocation of the site will not give rise to any highways issues and there is sufficient space on site to accommodate the additional pitches. The site is located within reasonable distance of local facilities and services and is considered unlikely to have an adverse impact on the character of the area or on the amenities of neighbouring land uses. As the site is an existing gypsy and traveller site it is already provided with essential services. The site has been considered within the SA for LPP2. The SA concludes there is one major adverse impact identified relating to the site’s location within Source Protection Zones 1, 2 and 3 and its proximity to an archaeological asset. It also lies within or close to other areas of constraint.

Monkton Farm, Farnham

- 4.19 The site comprises an existing gypsy and traveller site which currently accommodates a single pitch. The site is considered to be suitable to accommodate additional pitches as it represents an intensification of an existing use and represents the first tier in the sequential test outlined in LPP1 Policy AHN4. The site contains a range of sheds and other structures, many of which are in a poor state of repair and mobile homes. The site is 0.7 hectares in size. The site is not considered to be in an isolated environment as it is adjacent to the David Lloyd Sports Centre.
- 4.20 Monkton Farm is located a short distance from the residential areas of Hale and Weybourne to the north and west and Badshot Lea is to the east. The site is also within walkable distance to Farnham town centre. The landowner submitted a proposal to the Council through the Call for sites to further intensify the site and an assessment of the site concluded that further intensification and expansion are possible subject to the site being comprehensively redeveloped. Detailed design matters will need to be considered as part of the development management process.

- 4.21 In respect of the requirements in LPP1 Policy AHN4 the site is considered to meet the site specific criteria listed in the policy. As the site is already in use as a gypsy and traveller site it is capable of being provided with essential services. The site has been considered within the SA for LPP2. It concludes that there is one major adverse impact identified that relates to the site's location in Source Protection Zones 1 and 2. It also lies within or close to other areas of constraint.

Land at Knowle Lane, Cranleigh

- 4.22 The site is an existing gypsy and traveller site measuring 0.54 hectares in size with permission for a single pitch. The site lies about 1.8 km south of Cranleigh. Access to the site is via Knowle Lane through a tree belt and there is housing to the north, south and on the opposite side of Knowle Lane. The Council received the site through the Call for Sites.
- 4.23 The site is considered to be of a sufficient size to accommodate on site facilities for parking and manoeuvring vehicles and storage, play and residential amenity space. The site is located within a reasonable distance of local facilities and services including schools and health facilities and the site is well screened. The site has been considered within the SA for LPP2 which identifies no major adverse effects relating to the site, although it also lies within Countyside Beyond the Green Belt.

Burnt Hill, Plaistow Road, Dunsfold

- 4.24 One of the sites at Burnt Hill off Plaistow Road has recently become vacant. It had historically been used by travelling showpeople but has since changed ownership. The Council received a submission to the Call for Sites to extend the vacant site to include land used as a vehicle turning circle. The site adjoins two established gypsy and traveller sites to the north and south.
- 4.25 The site is the subject of a current planning application for the change of use of the site from a Travelling Showpeople site to provide 12 gypsy and traveller pitches (LPA Ref: WA/2019/1464).
- 4.26 Under Policy AHN4 of LPP1, the Council will look to safeguard existing authorised traveller and travelling showpeople sites unless they are no longer required to meet an identified need. Following discussions with the Travelling Showpeople community within the Borough there is no longer a need to allocate any plots in LPP2 for Travelling Showpeople. Nevertheless the TAA identifies a need for additional gypsy and traveller pitches during the plan period.
- 4.27 The site is suitable for use as a gypsy and traveller site as it adjoins existing gypsy and traveller sites. Although the current planning application is

proposing 12 pitches on the site, the site allocation in LPP2 is for a lower number to ensure sufficient space is provided on site for the manoeuvring of vehicles and caravans and to provide sufficient amenity, storage and play space. A suitable buffer between the site and Ancient Woodland to the east will be necessary and this has been taken into account when considering the quantum of development suitable for the site.

- 4.28 As the site is a former Travelling Showpeople site it is capable of being provided with essential services. The site has been considered within the SA for LPP2 and identifies several major adverse effects relating to the Ancient Woodland near the site, the proximity of the site to a range of services and public transport and its proximity to a Site of Special Scientific Interest. It also lies within or close to other areas of constraint.
- 4.29 The SA concludes that due to the small number of gypsy and traveller sites proposed for allocation in LPP2, and that all but one of the sites is an intensification of an existing gypsy and traveller site, and this will act to reduce the effect of developing these sites.

Appendix 1: Planning Permissions Granted Between 1 April 2017 to 1 April 2020

Planning Application Reference	Site Name	Description of Development	Date of Decision	Number of pitches consented
WA/2013/0923	Land adjacent to 1 East View Cottages, Dunsfold Road, Alfold	Change of use of land for the stationing of caravans for residential purposes for 1 traveller pitch together with formation of additional hardstanding and erection of utility/dayroom ancillary to that use	26/06/2017	1 pitch
WA/2016/0179	Land North of Lydia Park, Stovolds Hill, Cranleigh	Change of use of land to mixed use grazing of horses and residential use for stationing of 6 caravans; erection of 3 utility buildings and associated works including hardstanding.	04/12/2017	3 pitches
WA/2017/0176	Land to the West of Lydia Park, Stovolds Hill, Cranleigh	Change of use of land to a mixed use site, for the stabling and keeping of horses, and residential use for three Gypsy families. The site to contain three static caravans, three touring caravans, with associated parking, hardstanding and water treatments plants.	13/08/2018	3 pitches
WA/2018/1364	Land North of 11A Lydia Park, Stovolds Hill, Cranleigh	Change of use of land to residential use with stationing of 2 caravans, erection of 1 amenity building, hardstanding and an ancillary storage yard.	18/01/2019	1 pitch
WA/2019/0515	Land North of Lydia Park Centred Co-ordinates 502164 137703 Stovolds Hill, Cranleigh	Change of use of land to mixed use, to provide 4 gypsy pitches comprising of 4 static caravans, 4 touring caravans, with associated parking, hardstanding and septic tanks together with stabling and keeping of horses.	04/10/2019	4 pitches

Planning Application Reference	Site Name	Description of Development	Date of Decision	Number of pitches consented
WA/2019/1265	Land North of Lydia Park, Stovolds Hill, Surrey	Change of use of land to residential use for 9 gypsy families. The site to contain 9 static caravans, 9 touring caravans, 3 amenity buildings, boundary walls, hardstanding and water treatment plants.	19/02/2020	6 pitches
WA/2019/0116	Land centred coordinates 482312 145552, River Lane, Farnham	Erection of 2 day rooms, stables and use of land for stationing of additional 4 mobile home pitches together with the formation of additional hard standing.	19/02/2020	4 pitches
WA/2018/1474	Pollingford Place, Horsham Road, Ellen's Green, Rudgwick, Horsham RH12 3AS	Change of use of land to gypsy/traveller site incorporating: 7 no. private pitches each including 1 no. dayroom, 1 no. mobile home; parking area for touring caravans to be also used as seasonal transit pitches; and associated hardstanding and landscape areas.	27/03/2020	7 pitches
Total				29 pitches