Tony Whitty
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East Pallant House
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16/04/2024

Dear Tony

**Chichester Local Plan Review**

Following your recent enquiry in relation to the new Local Plan for Chichester District Council I can provide the following update regarding need from Gypsy and Traveller households in response to changes made by the Government to the PPTS Annex 1 in December 2023.

These changes were made in response to the Lisa Smith Court of Appeal Judgement that was handed down in October 2022.

Firstly, my views on the implications of the changes that were made to the PPTS in 2023 in relation to GTAAs are as follows:

* As a result of the Lisa Smith Judgement the PPTS was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller by reintroducing those who have ceased to travel permanently due to education, ill heath, or old age into the definition.
* When the 2012 definition was issued the alternative planning definition in the 2004 Housing Act was also in place (now revoked by the Housing and Planning Act in 2016). This included anyone of a nomadic habit of life or those living in a caravan. So if a household did not meet the 2012 PPTS definition it was highly likely that they would meet the 2004 Housing Act definition if they were living in a caravan on a site.
* Now that the Housing Act definition has been revoked, there will still be large numbers of households who will not meet the PPTS 2023 planning definition if they have never travelled or have never travelled for work – i.e. under case law you can only have ceased to travel (either temporarily or permanently) if you have previously travelled for work or for seeking work.
* Having reviewed several recent GTAAs that have been completed by ORS the vast majority of those who will now meet the planning definition who have previously travelled for work and have now ceased to travel permanently are old or sick, have no children now living with them, and (unless they are living on a temporary or unauthorised site) do not generate much, if any, need.
* These reviews concluded that whilst a number of households may now move under the 2023 definition, they bring little or no need over with them. The majority of need from remaining non-definition households is from teenagers and through new household formation from families with children who do not travel, or do not travel for work.
* Therefore, in my professional view the changes to the PPTS in December will not change things as far as our GTAAs are concerned other than a little alteration to very slightly increase need (if any is identified) from those who have legitimately ceased to travel permanently; that the target for 5-year supply should also not change very much, if at all; and that Para 63 in the revised NPPF should still be used to address need from those who do not meet the revised planning definition and that this 5-year need should continue to be considered alongside wider housing need.

In summary, households who have never travelled, or have never travelled for work do not meet the 2023 PPTS planning definition of a Traveller.

**Review of the 2022 Chichester GTAA**

In April 2024 the Council asked ORS to complete a review of the GTAA that was completed for Chichester in 2022.

The 2022 GTAA identified the following outcomes in relation to the need for pitches in Chichester for the period 2022-2039:

* Need from households that met the 2015 PPTS definition = 121
* Need from households that did not meet the 2015 PPTS definition = 28
* Need from undetermined households (not interviewed) = 9

The adjusted 5-year need target for the new Local Plan for the period 2024-2028/29 (including residual need for the period 2022-2024) is for 91 pitches. This is made up of:

* Need from households that met the 2015 PPTS definition = 88
* Local proportion (68%) of need from undetermined households = 3
* **TOTAL = 91**

**Implications of the PPTS 2023 planning definition**

The outcomes of the 2022 interviews with households that did not meet the PPTS 2015 definition were reassessed against the PPTS 2023 definition and the outcomes of this review are:

* Number of households that did not meet the PPTS 2015 definition = 61
* Total need from non-definition households for 2022-2039 = 28
* Number of the 61 households who now meet the PPTS 2023 definition = 10
	+ Land at March Farm (3 households).
	+ The Willows (2 households).
	+ Apple Cross (2 households).
	+ Longacre (2 households).
	+ Land NW of Newbridge Farm (1 household).
* Total need from households now meeting the PPTS 2023 definition = 4
	+ 3 x doubled-up (2 @ March Farm and 1 @ Apple Cross).
	+ 1 x 5-year need (1 @ Apple Cross).
	+ No future need from younger children as there are none living on the 5 sites.
	+ Both site owners where need has been identified stated that they can meet this need on their current sites subject to the granting of planning permission.

Therefore the adjusted 5-year need target for the new Local Plan for the period 2024-2028/29 is for **95 pitches** (91 + 4).

Therefore, I can confirm that in my professional view the implications of the changes to the PPTS in 2023 have resulted in a total of 10 households moving from not meeting the PPTS 2015 definition to meeting the PPTS 2023 definition, and that they bring a need across with them for 4 pitches.

The implications of this are that there are now 51 Gypsy and Traveller households in Chichester that do not meet the PPTS 2023 definition and that they have a need for 24 pitches for the period 2022-2039.

Finally, there were no Travelling Showpeople that did not meet the PPTS 2015 definition so there are no changes to the figures in the 2022 GTAA.

Regards



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