

Gypsies, Travellers and Travelling Showpeople - Topic Paper

Proposed Main Modifications

Background

1. The Council's previous evidence and MIQ answers set out at some length the explanation and justification for the Council's approach in relation to identifying and meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople. For the purposes of this Paper, it is noted that in summary the need as identified in HOU 05.01 - St Albans Gypsy and Traveller Accommodation Assessment Report (2024) (GTAA¹) to 2041 comprises: 95 Gypsy and Traveller pitches, of which 60 constitute 5 year need; and 7 plots for Travelling Showpeople, all of which constitute 5 year need.
2. To identify the 5 year need from expected Plan adoption in 2026 the GTAA-identified 2024-28 need for 54 pitches plus two fifths of the period 2029-33 need of 14 pitches was used; ie 54 pitches plus 6 pitches; to total 60 pitches. This approach by which to calculate the 5 year need from Plan adoption has been agreed by the GTAA consultants.
3. In summary, the Council seeks to meet the identified need for additional Gypsy and Traveller pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites; and the Council seeks to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, at East Hemel Central and East Hemel South Broad Locations.
4. The Council seeks to meet the identified need for Travelling Showpeople households to 2041 at the existing Noke Lane site. This is in accordance with the GTAA recommendation at 8.15: *"It is recommended that the current need could be addressed through the intensification or expansion of the existing yard in St Albans."*
5. The Council's Stage 1 Matter 1 Issue 6 Hearing Statement included an appended 'Proforma Assessment of Existing Traveller Sites and Sites Put Forward in the Call for Sites 2024' (available via [Matter 1 - Issue 6.3 - Appendix 1](#)), which identified:
 - 122 potential additional Gypsy Traveller pitches at existing private sites; of which 90 are on sites put forward in the 2024 Call for Sites, and 32 are not;
 - 11 potential additional plots for Travelling Showpeople at Noke Lane. N.B. the 11 potential additional plots included the regularisation of the 4 existing plots at the site, the GTAA only listed the need as being the additional need over and above the existing 4 plots, i.e. 7 plots.
6. Following the Stage 1 Hearing sessions additional evidence was published in Examination Document SADC/ED79 and made available for consultation. The

¹ HOU 05.01 is available via [HOU 05.01 - St Albans Gypsy and Traveller Accommodation Assessment Report \(2024\).pdf](#)

additional evidence consisted of a short Topic Paper plus the relevant parts of the aforementioned Stage 1 Hearing Statement and the proforma assessment.

Stage 2 Hearing Sessions – Additional Work Required

7. At the Stage 2 Local Plan Hearing Session of the morning of Wednesday 15 October 2025, the Inspectors indicated that additional work was required by the Council in the interests of the soundness and effectiveness of the Plan and in particular Policy HOU6 – Gypsies, Travellers and Travelling Showpeople. In summary, the points below set out the changes required for soundness (in bold text) along with the Council's proposed ways forward in response (indented):
 - i. **The need figures should be included in the Policy and set out as a minimum.**
 - The Council seeks to address this with Main Modifications to the reasoned justification and to insert a new first paragraph to the Policy. The changes proposed to the reasoned justification paragraphs are included within SADC/ED85A and SADC/ED85C; the changes proposed to the Policy are set out below.
 - ii. **The Policy should be more positively worded and should more explicitly allow for potential windfall development at potential new sites.**
 - The Council seeks to address this with Main Modifications to introduce proposed new criteria a) and b) as set out below.
 - iii. **The Policy should more explicitly state how potential windfall development at potential new sites will be considered.**
 - The Council seeks to address this with Main Modifications to introduce new criteria b) and c), as set out below.
 - iv. **The Plan should explicitly list those sites which are proposed to meet the identified needs as allocated sites. This should cross-refer to the previous work the Council has undertaken and consulted on, including SADC/ED79 'Meeting identified accommodation needs of Gypsy Traveller and Travelling Showpeople - additional clarification'².**
 - The Council seeks to address this with a Main Modification to introduce a new criterion a) including point iii which references a new Appendix 7, as set out below. The cross referencing to the previous work including SADC/ED79 is included in this Paper.
 - v. **Demonstrate that the identified sites would meet the identified needs.**
 - The Council seeks to address this in the Main Modifications proposed and in the evidence, as summarised in the below sections of this Paper.

Proposed Main Modifications

² SADC/ED79 is available via: [Meeting identified accommodation needs of Gypsy Traveller and Travelling Showpeople - additional clarification](#)

8. Taking the above into account, changes are proposed to Policy HOU6 as set out below:

HOU6 – Gypsies, Travellers and Travelling Show-People

The accommodation needs for Gypsies and Travellers over the Plan period are for a minimum of 95 additional pitches. The accommodation needs for Travelling Showpeople over the Plan period are for a minimum of 7 additional plots.

- a) To provide for the accommodation needs of Gypsies and Travellers and Travelling Show-people the Council has allocated sites as set out below:
 - i. East Hemel Hempstead (South) Broad Location - ~~one up to 15-~~ 20 pitches es-site;
 - ii. East Hemel Hempstead (Central) Broad Location - ~~one up to 15-~~ 20 pitches es site; and
 - iii. Reconfiguring, regularising or extending existing sites which are listed as 'Allocations' or 'Identified Opportunity Sites' in Appendix 7.
- b) Other proposals at sites which are not listed in a) will be determined in accordance with national policy.
- c) All proposals should:
 - i. Make efficient use of land. Pitch sizes should not exceed 500m² and can be considerably less. Site design should be assessed in relation to the specific circumstances of the site and in particular whether there is a need for integrated general amenity and landscaping space; and
 - ii. Take account of any additional criteria contained in Government guidance.

N.B. The highlighted text above identifies wording that is additional to the Submission version of HOU6, along with some deletions referenced in this Paper. However, the proposed modified Policy also includes significant re-ordering and other deletions. For ease of reference the Submission version of HOU6 is included at Appendix C of this Paper.

9. It is proposed that the new Appendix 7 referenced above would be titled *"Appendix 7 – List of Sites referenced at Policy HOU6 a) iii."*
10. It is proposed that the new Appendix 7 would list the following existing sites as 'Allocations':
- 1) Ardens Rise, House Lane, St Albans
 - 2) Chiswell Green Lane, St Albans
 - 3) Meadowside, North Orbital Road, Chiswell Green
 - 4) Mill House Yard, Coursers Road, Colney Heath
 - 5) Nuckies Farm, Coursers Road, Colney Heath

- 6) Tullochside, Hemel Hempstead Road, Redbourn
 - 7) Woodview Lodge and Hoofprints, Lye Lane, Bricket Wood
 - 8) Noke Lane, Noke Nurseries, St Albans
11. It is proposed that the new Appendix 7 would list the following existing sites as 'Identified Opportunity Sites':
 - 1) The Meadows
 - 2) The Paddocks
 - 3) Little Orchard
 12. The precise location and address of the above sites is set out in the Proforma Assessment Appendix in document SADC/ED79. The location of the listed sites as recorded in the Proforma Assessment is included as Appendix B to this Paper. It is proposed that these sites be reproduced on the Policies Map, with those sites listed as 'Allocations' in one colour and those sites listed as 'Identified Opportunity Sites' in a different colour in due course. It is proposed that a clarifying sentence at Plan Appendix 7 be included to state: *"The location of the above sites is shown on the Policies Map."*
 13. The proposed new Plan Appendix 7 is appended to this Paper as Appendix A.

Justification for the Proposed Main Modifications

14. The proposed Main Modification to insert the 2 new sentences to the start of the Policy meets the requirement that the identified need figures be included in the Policy and to set them out as a minimum. It is considered that the proposed additional text is clear and effective in setting out the need figures and in stating that they are minimum figures.
15. The proposed Main Modification to introduce new criterion a) clarifies which sites the Council are allocating. It includes the allocations at East Hemel Hempstead sites H3 and H4 that were previously set out at criterion d), along with reference to those existing sites which are proposed to be listed as 'Allocations' or 'Identified Opportunity Sites' in new Appendix 7.
16. The identification of sites as 'Allocations' or 'Identified Opportunity Sites' reflects the degree to which there is evidence that they are likely to deliver additional pitches in the Plan period. (Please see additional justification for the listed sites set out in the relevant sections below).
17. It is considered that the proposed Main Modification to insert new criterion b) clearly and effectively sets out how windfall development at new sites will be considered. Furthermore, the proposed new criterion c) clarifies that all proposals should meet the requirements listed (which were included at criteria b) and c) of the Submission version), whether at the sites listed at new criterion a) or at new sites.
18. The additional Main Modifications proposed in relation to the East Hemel Hempstead sites H3 and H4 at proposed new criterion a) (which were listed at criterion d in the Submission version) seek to clarify that a total of 40 pitches would be provided at these locations (as opposed to 'up to' 40). The deletion of

reference to delivery of the required pitches at specifically one site at each of the allocations allows for a degree of flexibility as to how the required pitches are delivered. These Main Modifications are proposed in order to provide greater certainty that identified needs would be addressed. They address points raised by the Inspectors at the Stage 2 Local Plan Hearing Sessions of both 21 and 22 October 2025.

19. In the interests of consistency, Main Modifications are also proposed to remove the 'up to' wording from the Key development requirements for sites H3 and H4. In the interests of clarity, additional wording is proposed to be removed as a result of the Hearing Sessions.
20. The requirements as proposed to be updated read as follows:
 - H3: 14A. Provision of ~~up to 15-20~~ pitches for Gypsies and Travellers to meet identified need, ~~taking into account existing local provision and the availability of alternative sites as well as best practice on location and design.~~
 - H4: 12. Provision of ~~up to 15-20~~ pitches for Gypsies and Travellers to meet identified need, ~~taking into account existing local provision and the availability of alternative sites as well as best practice on location and design.~~
21. In addition, Modifications are proposed to replace 'Show People' with 'Showpeople' so as to more closely reflect the wording used in national policy.
22. There are associated proposed Main Modifications to the reasoned justification to the Policy, these are set out at Appendix E to this Paper. The bold underlined changes at Appendix E are those which were not already reflected in SADC/ED85A and SADC/ED85C.

Justification for the existing sites included in the proposed new Appendix 7

Allocations

23. The 'Allocations' are those existing sites where there is greater evidence that they would in practice contribute to meeting identified needs in the Plan period. The potential additional pitches identified in the Proforma Assessment Appendix in SADC/ED79 are assessed below as to their deliverability³ and developability⁴ with reference to evidence in the aforementioned proforma assessments as follows:

³ The PPTS 2023 notes at Footnote 4:

To be considered deliverable, sites should be 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. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

⁴ The PPTS 2023 notes at Footnote 5:

To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged

1) Ardens Rise, House Lane, St Albans

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
- i. An expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes recent applications for additional pitches dated 2019 and 2023.
There is also a more recent application, as noted in the Council's answer to Matter 1 Issue 3 Q2, at 2.11 xiii:
SADC Ref: 5/2025/1537 - Ardens Rise – **Pending** application for:
"Change of use of land to use as a residential Gypsy/Traveller caravan site accommodating a total of 21 caravans, including no more than 19 static caravans/ mobile homes".
N.B. This application is for the stationing of 5 additional mobile homes within the boundaries of the existing site.
 - iii. There are no 'Major Policy and Environmental Constraints' or notable 'Other Key Constraints' which would preclude additional pitches at the site.
 - iv. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 18.
 - v. Planning application ownership records indicate that the owners of the existing Gypsy Traveller site also own an open area to the rear of the site; with a total ownership of c.1.6ha.
- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:
This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...
- *Intensification: ...4 additional pitches, to total 18 pitches at the existing site*
 - *Expansion: ...21 additional pitches, to total 35 pitches at the site.*
- N.B. The adjacent land under the same ownership has the space to provide for more pitches. However, for the purposes of this assessment, whether through intensification or expansion or a mixture of both, a limit of 35 is applied for the overall total number of pitches at the site, due to estimations of likely future growth need from this site and consideration of relevant parts of the PPTS.*
- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 21 pitches; of which the 5 pitches subject of the current pending application should be considered 'deliverable', and 16 pitches 'developable', in terms of the PPTS definitions.

2) Chiswell Green Lane, St Albans

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
 - i. The expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes a relatively recent application for additional pitches dated 2016.
 - iii. There are no 'Major Policy and Environmental Constraints' or notable 'Other Key Constraints' which would preclude additional pitches at the site.
 - iv. The GTAA 2024 identified that the site contains 2 unauthorised pitches.
 - v. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 7.
 - vi. Planning application ownership records indicate that the owners of the existing authorised Traveller site in the west part of the site also own the east part of the site.

- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:

This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...

 - *Regularisation of 2 of the existing pitches plus 4 additional pitches, to total 7 pitches at the wider site.*

- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
 - 7 pitches; of which the regularisation of the 2 existing unauthorised pitches should be considered 'deliverable', and 5 pitches 'developable', in terms of the PPTS definitions.

3) Meadowside, North Orbital Road, Chiswell Green

- a) The 'Description of Site' section of the Proforma Assessment Appendix in SADC/ED79 includes:

It is an existing Traveller site comprising 4 private pitches. The ORS GTAA notes that they are 'Tolerated' sites.

- b) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
 - i. There are no 'Major Policy and Environmental Constraints', and although there are notable 'Other Key Constraints' it is not considered that these would preclude additional pitches at the site.
 - ii. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 5.

- c) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:

This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...

- *Regularisation / Intensification: ... Regularisation of the 4 existing pitches and 1 additional pitch, to total 5 pitches at the site.*

- d) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 5 pitches; of which the existing 'tolerated' pitches should be considered 'deliverable' by reason of the ongoing long term occupation of the site, and 1 pitch should be considered 'developable' in terms of the PPTS definitions.

4) Mill House Yard, Coursers Road, Colney Heath

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
- i. An expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes a recent application for pitches dated 2020.
 - iii. There are no 'Major Policy and Environmental Constraints', and although there are notable 'Other Key Constraints' it is not considered that these would preclude additional pitches at the site.
 - iv. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 5.
 - v. Planning application ownership records indicate that the owners of the existing Gypsy Traveller site also own adjacent land, up to 0.4ha.
- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:
- This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...*
- *Expansion: ...8 additional pitches, to total 12 pitches at the site.*
- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 8 pitches; which should be considered 'developable', in terms of the PPTS definition.

5) Nuckies Farm, Coursers Road, Colney Heath

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:

- i. An expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes a relatively recent application for retention of pitches dated 2018.
 - iii. There is a 'Major Policy and Environmental Constraint' in relation to functional floodplain; but see below commentary in relation to the findings of the Inspector in this regard.
 - iv. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 7.
 - v. Planning application ownership records indicate that the owners of the existing Gypsy Traveller site also own the adjacent area to the rear of the site; with a total ownership of c.1.04ha.
- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that "...the Appeal Decision which granted temporary permission found the proposal to be acceptable in relation to flood risk" and sets out relevant Appeal Decision quotes. It then states *"it is considered reasonable to assume that there is a reasonable prospect of the retention of the existing 3 pitches at the site, to contribute to meeting need."*
- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 3 pitches; and noting that this constitutes the retention of the existing pitches it is considered that they are 'deliverable' in terms of the PPTS definition.

6) Tullochside, Hemel Hempstead Road, Redbourn

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
- i. An expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes a relatively recent application for additional pitches dated 2018.
 - iii. There are no 'Major Policy and Environmental Constraints' or notable 'Other Key Constraints' which would preclude additional pitches at the site.
 - iv. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 15.
 - v. Planning application ownership records indicate that the owners of the existing Gypsy Traveller site also own a significant area of adjacent land.
- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:
- This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...*
- *Expansion: ...18 additional pitches, to total 35 pitches at the site.*

N.B. The adjacent land under the same ownership has the space to provide for more pitches. However, for the purposes of this assessment, a limit of 35 is applied for the overall total number of pitches at the site, due to estimations of likely future growth need from this site and consideration of relevant parts of the PPTS.

- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 18 pitches; which should be considered 'developable', in terms of the PPTS definition.

7) Woodview Lodge and Hoofprints, Lye Lane, Bricket Wood

N.B. The 'Description of Site' section of the Proforma Assessment Appendix in SADC/ED79 states that *"The two sites Woodview Lodge and Land Rear of Hoofprints are directly adjacent to each other, and effectively form one traveller site consisting of 16 private pitches."* They were therefore assessed together in the Proforma Assessments, and are considered together in this Paper and the proposed new Appendix 7 list.

- a) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
- i. An expanded site was put forward in the 2024 Call for Sites.
 - ii. The relevant planning history includes reference to a number of recent applications at the site, including recent submissions from 2024 or 2025 and both the Woodview Lodge and Hoofprints parts of the site. It notes: *"There were two applications for an additional 8 pitches either Withdrawn or made Invalid in 2024; albeit the ORS Report identified 9 unauthorised pitches at the wider site."*
N.B. Current additional pending application 5/2025/0303 is for *"Extension to existing Gypsy/Traveller site comprising 8 additional pitches consisting each of 8 Static caravans, 8 touring caravans and the erection of a combined day room (part retrospective)"*.
 - iii. There are no 'Major Policy and Environmental Constraints', and although there are notable 'Other Key Constraints' it is not considered that these would preclude additional pitches at the site.
 - iv. The number of 320m² pitches that could fit in the area containing existing Gypsy Traveller uses is 15.
 - v. Planning application ownership records indicate that the owners of the existing Gypsy Traveller site own adjacent land.
- b) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:
- This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of additional pitches through...*
- *Regularisation: ...10 pitches*
 - *Expansion: ...19 additional pitches, to total 35 pitches at the site.*

N.B. The adjacent land under the same ownership has the space to provide for more pitches. However, for the purposes of this assessment, a limit of 35 is applied for the overall total number of pitches at the site, due to estimations of likely future growth need from this site and consideration of relevant parts of the PPTS.

- c) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 19 pitches; of which 10 pitches (consisting of the 8 pitches at Woodview Lodge and the 1 pitch at Hoofprints currently subject of Pending applications, plus the additional pitch at Woodview Lodge found to be on site in the GTAA surveys) should be considered 'deliverable', and 9 pitches 'developable', in terms of the PPTS definitions.

8) Noke Lane, Noke Nurseries, St Albans

- a) HOU 05.01 (the GTAA 2024) sets out at paragraph 7.36:
Analysis of the household interviews indicated that there is a need for 5 pitches from concealed/doubledup/over-crowded households or single adults; 2 pitches from a 5-year supply from teenage children; and no pitches from new household formation. Therefore, the overall level of need for those households who met the planning definition of a Travelling Showperson in St Albans is for 7 plots over the GTAA period [which is to 2041, as is the Plan period].
Noting that the Noke Lane site is the only existing site for Travelling Showpeople in the District it is understood that this current need arises from this site.
- b) The findings of the 'Deliverability Assessment' section of the Proforma Assessment Appendix in SADC/ED79 include the following of relevance in relation to this site:
- i. The relevant planning history includes historic applications for plots for Travelling Showpeople.
 - ii. There are no 'Major Policy and Environmental Constraints' or notable 'Other Key Constraints' which would preclude additional pitches at the site.
 - iii. The number of 720m² plots that could fit in this area: 11.
 - iv. Records indicate that the owners of the area subject of the previous permissions for plots for Travelling Showpeople...also own the adjacent land to the north, totalling c.7,960m² in area; and aerial photography indicates that this wider area forms the existing use as a Travelling Showpersons yard.
- c) The 'Conclusion' section of the Proforma Assessment Appendix in SADC/ED79 notes that:
This assessment indicates that there is a reasonable prospect that the existing site can accommodate the following number of plots at the site through...

- *Regularisation: 4 plots*
- *Intensification: ...7 additional plots, to total 11 plots at the site.*

- d) Taking the above into account, along with the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, it is proposed that the site be allocated for:
- 11 plots; which when noting that all the need comprises existing need arising from this site, and that there has been ongoing long term occupation of the site, should be considered 'deliverable', in terms of the PPTS definition.

Identified Opportunity Sites

24. The 'Identified Opportunity Sites' are those existing sites where there is more limited evidence that they would in practice contribute to meeting identified needs in the Plan period. In considering the deliverability and / or developability of the potential additional pitches identified in the Proforma Assessment Appendix in SADC/ED79, it is found that, in each case:
- The site was not put forward in the 2024 Call for Sites;
 - There is no recent Relevant Planning History; and
 - It is not considered that there is sufficient evidence that additional pitches would be 'deliverable' or 'developable' with reference to the PPTS definitions.
25. However, noting the Council's supportive approach to meeting identified needs for additional private pitches at existing sites, it is considered appropriate that the potential additional pitches at these sites (as identified in the Proforma Assessments) be acknowledged through identifying them as 'Identified Opportunity Sites'. It is considered that this 'Identified Opportunity Site' status plus the proposed Policy wording to support provision at sites listed in the Appendix, would lead to some of the potential identified in the Proforma's being realised in the Plan period.
26. The potential additional pitches identified in the Proforma Assessment Appendix in SADC/ED79 for the proposed 'Identified Opportunity Sites' are, in summary:
- 1) The Meadows: 17 pitches through the potential Intensification of the site
 - 2) The Paddocks: 11 pitches through the potential Intensification of the site
 - 3) Little Orchard: 4 pitches through the potential Intensification of the site

Existing and Proposed Public Provision

27. The three existing public sites identified in the Proforma Assessment Appendix in SADC/ED79 are not included in the proposed new Appendix 7 due to the Council seeking to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, i.e. at East Hemel Hempstead sites H3 and H4. The three existing public sites not included in the proposed new Appendix 7 are:
- 1) Park Street / Watling Street
 - 2) Barley Mow
 - 3) Ver Meadows

28. In relation to the proposed provision at H3 and H4, the Council's answer to Stage 2 Matter 1 Issue 3 Q2 in paragraph 2.10 final bullet sets out:

The planning application for this development [at East Hemel Hempstead] is expected to be submitted in Autumn / Winter 2025 and the updated Housing Trajectory sets out that the first homes will realistically be completed in 2029/30. The Council's expectation is that delivery will include the 2 public site allocations by the end of the 2030/2031 period; within 5 years of expected adoption of the Plan.

29. It is therefore considered that these pitches should be considered 'deliverable' pitches when considering the PPTS 2023 definition.

Findings

30. Taking the above into account, and in response to the Inspectors' requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound, the totality of potential provision would be as set out in the following table:

Site	'Deliverable' pitches / plots from 'Allocations'	'Developable' pitches from 'Allocations'	Potential pitches from Identified Opportunity Sites	Total pitches / plots to meet Identified Needs
Private sites:				
Ardens Rise	5 pitches	16 pitches		21 pitches
Chiswell Green Lane	2 pitches	5 pitches		7 pitches
Meadowside	4 pitches	1 pitch		5 pitches
Mill House Yard	n/a	8 pitches		8 pitches
Nuckies Farm	3 pitches	n/a		3 pitches
Tullochside	n/a	18 pitches		18 pitches
Woodview Lodge and Hoofprints	10 pitches	9 pitches		19 pitches
Noke Lane	11 plots	n/a		11 plots
Park Street / Watling Street				
The Meadows			17 pitches	17 pitches
The Paddocks			11 pitches	11 pitches
Little Orchard			4 pitches	4 pitches
Public Sites:				
Part B Allocation H3	20 pitches			20 pitches
Part B Allocation H4	20 pitches			20 pitches
Totals:	64 pitches and 11 plots	57 pitches	32 pitches	153 pitches and 11 plots

Overcrowding

31. It was also raised at the aforementioned Stage 2 Hearing session that this Paper should provide additional comment in relation to the issue of overcrowding at existing sites, including at existing public sites. The GTAA identified needs arising from overcrowding of existing sites including public sites as set out in a number of places in the GTAA report. A number of relevant key quotes in this regard are included at Appendix C to this Paper. Taking the GTAA findings into account it is considered that the issues around overcrowding at existing sites including public sites are acknowledged, and that the needs arising form a significant part of the identified needs that would be met as a result of the policies of the Plan.

Conclusion

32. The above sections of this Paper set out and justify the Council's response to the Inspectors' requirement for Main Modifications to Policy HOU6 and the supporting text as set out at the Stage 2 Local Plan Hearing Sessions of October 2025. These included the requirement that the Council allocate specific sites to meet identified needs in order for the Plan to be found sound.
33. The Findings set out above identify a total potential supply of 153 Gypsy and Traveller pitches and 11 Travelling Showpeople's plots, set against an identified need for 95 Gypsy and Traveller pitches and 11 Travelling Showpeople's plots.
34. There are 24 pitches from the proposed Appendix 7 'Allocations' identified in this Paper as being 'deliverable', with reference to the PPTS definition. This would, when combined with the 40 pitches proposed to be allocated at sites H3 and H4, total 64 'deliverable' pitches. This would meet the identified 5 year need of 60 pitches.
35. The identified 57 pitches from proposed 'Allocations' which are identified as 'developable' with reference to the PPTS definition would, when combined with the 64 identified 'deliverable' pitches, total 121 pitches. This would meet the identified total need of 95 pitches to 2041.
36. In addition, a potential of 32 Gypsy and Traveller pitches are identified at the proposed Appendix 7 'Identified Opportunity Sites'. It is considered that the 'Identified Opportunity Site' status, plus the proposed Policy wording to support provision at sites listed in Appendix 7, would be likely to lead to some of the potential identified in the Proforma's being realised in the Plan period.
37. The 11 Travelling Showpeople plots identified as 'deliverable' with reference to the PPTS definitions would meet the identified need for plots, which is for 7 plots in addition to the existing 4 tolerated plots.
38. In summary, it is considered that the evidence and proposed Modifications as set out in this Paper respond positively to the Inspectors' requirements and national policy and demonstrate that the identified accommodation needs of Gypsies and Travellers and Travelling Showpeople would be met.

Appendix A: Proposed new Plan Appendix 7:

Appendix 7 – List of Sites referenced at Policy HOU6 a) iii.

Allocations:

- Ardens Rise, House Lane, St Albans
- Chiswell Green Lane, St Albans
- Meadowside, North Orbital Road, Chiswell Green
- Mill House Yard, Coursers Road, Colney Heath
- Nuckies Farm, Coursers Road, Colney Heath
- Tullochside, Hemel Hempstead Road, Redbourn
- Woodview Lodge and Hoofprints, Lye Lane, Bricket Wood
- Noke Lane, Noke Nurseries, St Albans

Identified Opportunity Sites:

- The Meadows
- The Paddocks
- Little Orchard

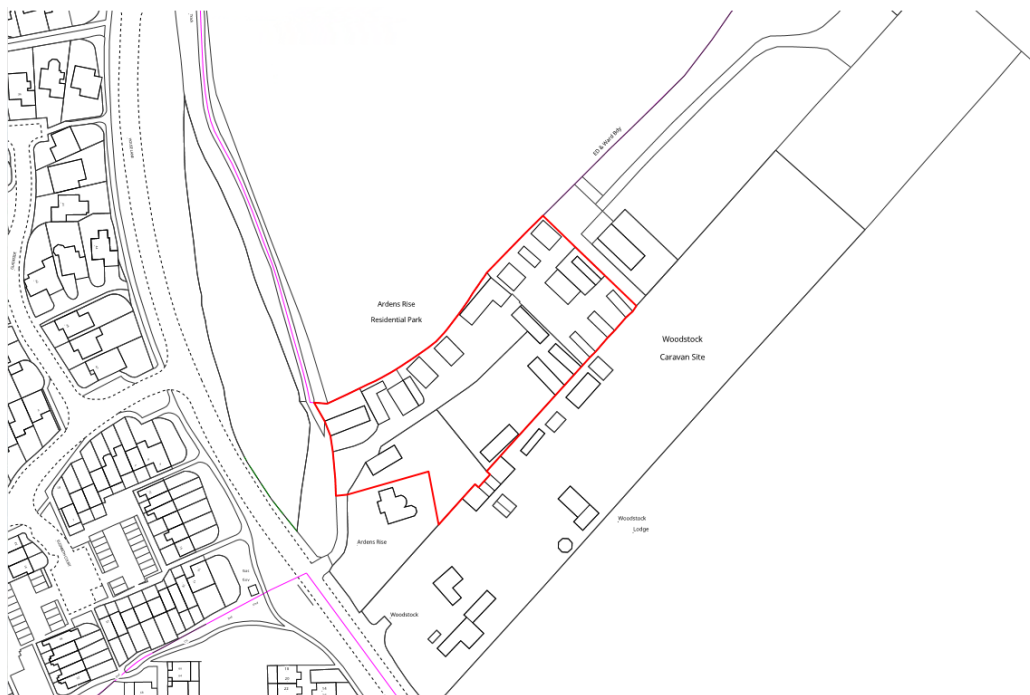
The location of the above sites is shown on the Policies Map.

Appendix B: Location of Sites Listed in Proposed new Plan Appendix 7, as Identified in the Proforma Assessment Appendix in SADC/ED79

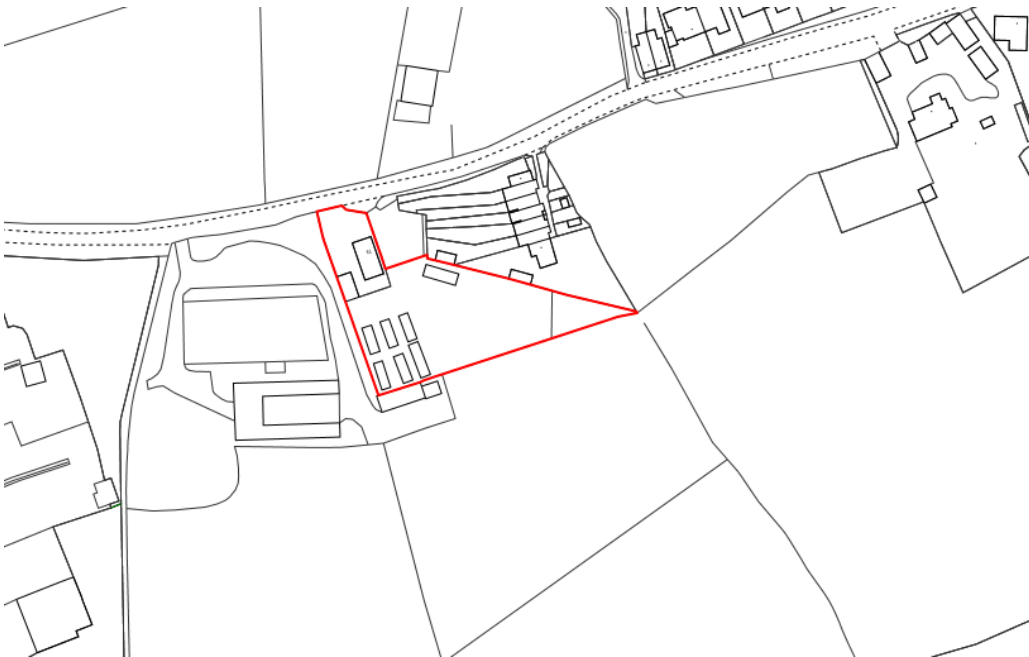
N.B. It is proposed that these sites be reproduced on the Policies Map in due course, with those sites listed as 'Allocations' in one colour and those sites listed as 'Identified Opportunity Sites' in a different colour.

Allocations:

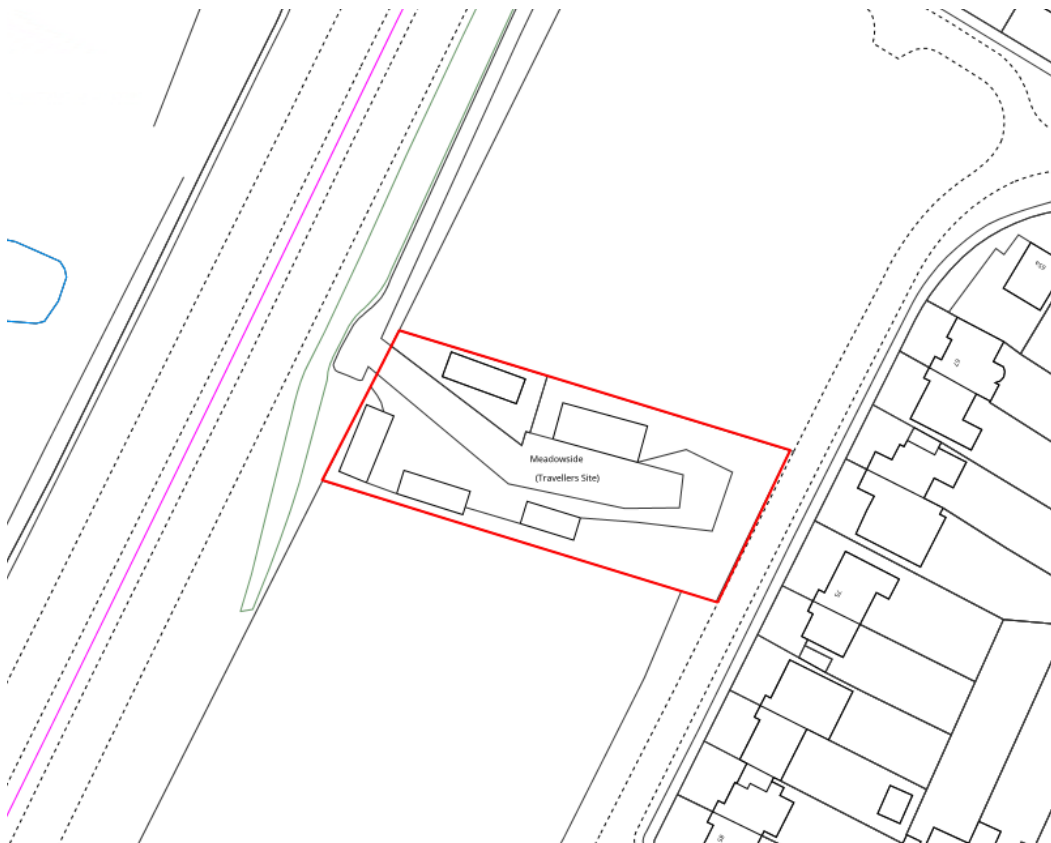
- Ardens Rise, House Lane, St Albans



- Chiswell Green Lane, St Albans



- Meadowside, North Orbital Road, Chiswell Green



- Mill House Yard, Coursers Road, Colney Heath



- Nuckies Farm, Coursers Road, Colney Heath



- Tullochside, Hemel Hempstead Road, Redbourn



- Woodview Lodge and Hoofprints, Lye Lane, Bricket Wood

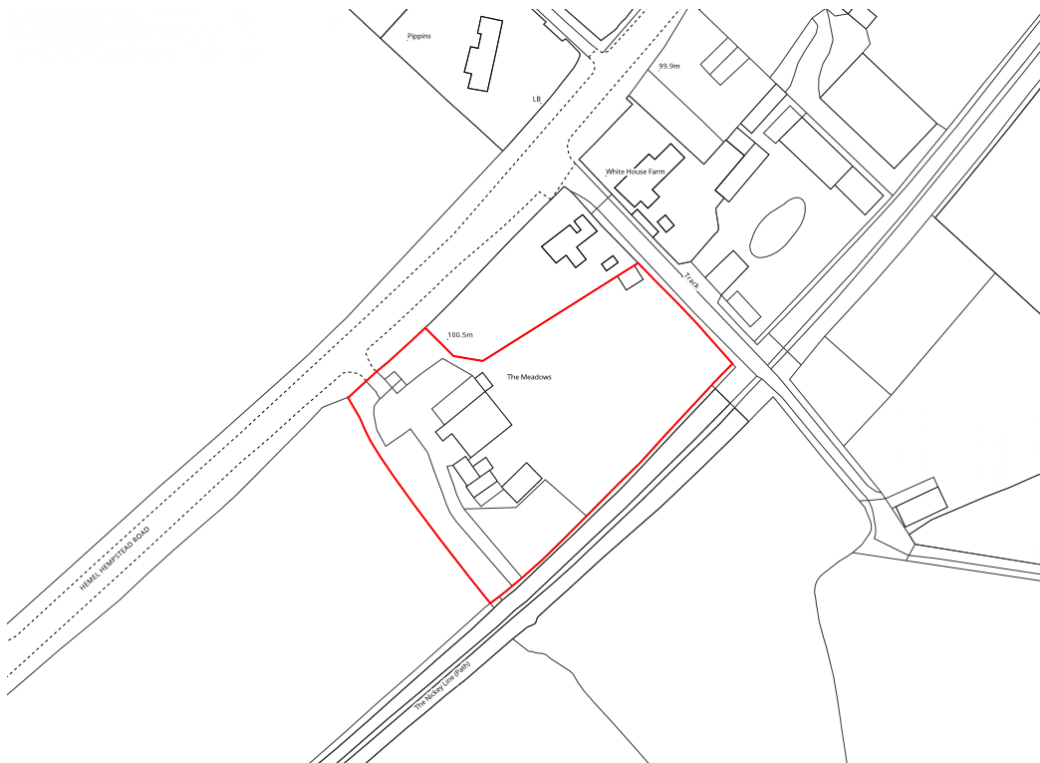


- Noke Lane, Noke Nurseries, St Albans



Identified Opportunity Sites:

- The Meadows



- The Paddocks



- Little Orchard



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Appendix C: Submission Version of Policy HOU6 - Gypsies, Travellers and Travelling Show People

HOU6 – Gypsies, Travellers and Travelling Show People

To provide for the accommodation needs of Gypsies and Travellers and Travelling Show people the Council will:

- a) Consider proposals for new accommodation with regard to the potential and suitability of the following:
 - i. New sites as part of Broad Locations for development that should accommodate a maximum of 20 pitches (each pitch being designed to accommodate 1 family / household);
 - ii. Reconfiguring or extending existing sites; and
 - iii. Sites with temporary permissions.
- b) Ensure that proposals make efficient use of land. Pitch sizes should not exceed 500m² and can be considerably less. Site design should be assessed in relation to the specific circumstances of the site and in particular whether there is a need for integrated general amenity and landscaping space;
- c) Take account of any additional criteria contained in Government guidance; and
- d) Based on a variety of factors including proximity to the road network most used by Gypsies and Travellers, development site scale, area topography and landscaping opportunities, and the wide range of uses to be provided in the Broad Locations for development; require provision of the following new sites:
 - i. East Hemel Hempstead (South) Broad Location - one up to 15-20 pitch site
 - ii. East Hemel Hempstead (Central) Broad Location - one up to 15-20 pitch site

Appendix D: Key Findings of HOU 05.01 - St Albans Gypsy and Traveller Accommodation Assessment Report 2024 in relation to Overcrowding at Existing Sites

Key Findings

Pitch Needs – Gypsies and Travellers

...

1.15 The GTAA has identified a need for 80 pitches for households that met the planning definition. This is made up of 4 unauthorised pitches; 1 temporary pitch; 17 from concealed/doubled-up/over-crowded households or single adults; 24 from a 5-year need from teenage children; and 36 from new household formation, using a rate of 2.00% derived from the household demographics. There were also 2 vacant pitches on public sites and these have been netted off as supply.

1.16 There is a need for 19 pitches for undetermined households. This is made up of 2 unauthorised pitches; 3 temporary pitches; a modelled need for 3 pitches from concealed/doubled-up/overcrowded households; a modelled need for 5 pitches from a 5-year need from teenage children; and 6 from new household formation, using the ORS national formation rate of 1.50%. If the locally derived proportion of households that met the planning definition (79%) were applied, this could result in a need for 15 pitches.

1.17 Whilst not now a requirement to include in a GTAA, there is a need for 23 pitches for households that did not meet the planning definition. This is made up of 5 unauthorised pitches; 1 concealed/doubled-up/overcrowded household or single adult; 7 from a 5-year teenage need; and 10 from new household formation, using a rate of 2.00% derived from the household demographics.

Plot Needs – Travelling Showpeople

...

1.22 There is a need for 7 plots for households that met the planning definition. This is made up of 5 plots from concealed/doubled-up/over-crowded households or single adults; 2 plots from a 5-year need from teenage children; and no plots from new household formation...

3. METHODOLOGY

...

Survey of Travelling Communities

...

3.14 All interviews were completed by members of our dedicated team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics, their current or future accommodation needs, whether there is any over-crowding or the presence of concealed households and travelling characteristics. Researchers also sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet future needs.

...

Current Need

3.38 The second stage was to identify components of current need, which is not necessarily the need for pitches because they may be able to be addressed by space already available in the study area. It is important to address issues of double counting:

» Households on unauthorised developments for which planning permission is not expected.

» Concealed, doubled-up or over-crowded households (including single adults)...

Appendix E: Proposed Main Modifications to the Reasoned Justification

N.B. The bold underlined changes are those which were not already shown in SADC/ED85A and SADC/ED85C.

Gypsies, Travellers and Travelling Show ~~P~~people

- 4.20 National planning policy sets out an 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.
- 4.21 The Council seeks to establish a positive framework for how provision for Gypsies, Travellers and Travelling Show ~~p~~people will be made in the District. This will guide development to more sustainable parts of the District, provide enhanced quality of life for the Gypsy and Traveller community, help to prevent unauthorised sites and ensure that environmental concerns, impact on the Green Belt and community cohesion are proactively addressed.
- 4.22 Evidence shows that there are future accommodation needs for Gypsies and Travellers over the Plan period. ~~The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications. For potential new sites, site suitability is affected by factors including proximity to the strategic road network, site size, the landscape and topography of the area, and availability of local services. These are set out in the Council's Gypsy and Traveller Accommodation Assessment Final Report 2024 (GTAA) and can be summarised as follows:~~
- Need for Gypsy and Traveller pitches to 2041 for households that meet the PPTS 2023 definition: 95 pitches
 - Need for Travelling Show ~~p~~people plots to 2041: 7 plots
- 4.22A The Council seeks to meet the identified need for additional pitches at private sites primarily through the regularisation, intensification, reconfiguration or expansion of existing sites. The existing sites are listed in Appendix 7. **The identification of sites as 'Allocations' or 'Identified Opportunity Sites' in Appendix 7 reflects the degree to which there is evidence that they are likely to deliver additional pitches in the Plan period.**
- 4.22B The Council seeks to meet the identified need for additional pitches at public sites through the two specific allocations identified in Policy HOU6, at East Hemel Central and East Hemel South Broad Locations. The Plan therefore provides additional accommodation opportunities which includes provision of new sites as well as potential redevelopment and expansion at existing sites through planning applications.
- 4.22C Potential new sites **would be determined in accordance with national policy. Planning Policy for Traveller Sites is currently the principal national policy, but relevant parts of the National Planning Policy Framework and local policy would also be applicable.**