

Wolverhampton **Local Plan**

Gypsy and Traveller Accommodation Topic Paper

Examination in
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1. Introduction

- 1.1 A key element of a new Local Plan is to allocate sites for different uses where a need has been demonstrated. This includes making provision for gypsy and traveller pitches and travelling showpeople plots, where appropriate.
- 1.2 In June 2025, at the initial stages of the Wolverhampton Local Plan (WLP) Examination in Public, the appointed Inspectors provided initial questions to Wolverhampton City Council (WCC), which included the request for a topic paper on meeting the accommodation needs of gypsies and travellers. The Inspectors noted that the Plan as submitted will not meet the area's identified gypsy and traveller accommodation needs, generating a shortfall. They requested a succinct summary of WCC's current position (as of June 2025), which:
- provides a justification for the chosen requirement figures and relevant policies;
 - confirms whether any impacts arising from not meeting the area's full identified needs have been appropriately assessed;
 - directs to the relevant evidence;
 - clarifies how any shortfalls will be addressed.

2. National Policy

- 2.1 In 2015 the Government published an updated Planning Policy for Traveller Sites (PPTS) setting out Local Planning Authorities' (LPAs) requirements to plan for Gypsies and Travellers. This was updated in December 2023 to reintroduce those who have ceased to travel permanently under the definition. A further update of the PPTS was published in December 2024. However, the WLP Regulation 19 Main Document [SD CD1] was prepared under the December 2023 National Planning Policy Framework (NPPF) and December 2023 PPTS.
- 2.2 The PPTS 2023 sets out national planning policy on Gypsies and Travellers to be read in conjunction with the NPPF 2023. The PPTS confirms that LPAs should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs of Gypsies and Travellers. To achieve this, LPAs should, in producing their Local 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 years 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 LPA has special or strict planning constraints across its area (LPAs have a Duty to Cooperate 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; and
- protect local amenity and environment.

2.3 The PPTS sets out the definition of Gypsies and 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 or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are "Gypsy and Travellers" for the purposes of this 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"

2.4 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 or permanently, but excludes Gypsies and Travellers as defined above."

2.5 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.

3. Current Development Plan

Black Country Core Strategy 2011 (BCCS)

- 3.1 BCCS Policy HOU4 sets indicative targets for the period 2008-18 for the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for each of the Black Country Authorities (BCA). The targets for Wolverhampton were 36 pitches and three plots. In accordance with Policy HOU4, the Stafford Road Corridor Area Action Plan (2014) made provision for additional capacity of 12 pitches on one site allocation – Former Bushbury Reservoir, Showell Road (WLP site GT1). By 2022, two additional pitches and one additional plot had also been provided through windfall planning permissions.
- 3.2 The BCCS also set out an indicative target for 10-12 transit pitches to be provided in the Black Country as a whole. By 2022, separate transit pitch sites had been provided in Dudley, Sandwell, Wolverhampton and Walsall providing over 80 pitches in total.

4. Gypsy and Traveller Accommodation Assessment

- 4.1 A Black Country and South Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2017 to inform the review of the Black Country Core Strategy. An updated Black Country GTAA was commissioned in 2020 to inform the preparation of the Draft Black Country Plan Regulation 18. Due to the Covid 19 pandemic the update was delayed and was completed in 2022 and published in 2023.
- 4.2 Following the end of work on the BCP in October 2022, the 2022 GTAA [WLP Submission Document (SD) HO2] was used to inform preparation of the Wolverhampton Local Plan, and a short addendum was produced in 2023 to cover the extended Plan period to 2042 [SD HO1].
- 4.3 The 2022 GTAA found that gypsy and traveller populations are very low in Wolverhampton, with five caravans per 100,000 population in 2021 compared to 85 in the West Midlands and 43 in England. Through fieldwork, the 2022 GTAA identified a total of 42 authorised pitches on two sites (40 on one WCC-owned site), and four authorised travelling showpeople plots on one yard at Phoenix Park.
- 4.4 The GTAA also identified 14 unauthorised pitches on two additional sites. Following survey, 12 of these pitches on one site (at Bridge Street, Heath Town) were found to be occupied by households which did not meet the gypsy and traveller definition, and therefore were discounted from the GTAA need calculation and WLP site selection processes.

- 4.5 In 2016, an additional site at The Mount, Deans Road, gained permission for “The use of land for the stationing of caravans for residential purposes, together with the formation of hardstanding and utility dayrooms”. The letter accompanying the application (16/00248/FUL) stated: “the applicant seeks permission to provide 3 no. residential family pitches, to meet a recognised need for such facilities in the area to facilitate a gypsy lifestyle.” Subsequent information stated that each pitch was “a single gypsy pitch made up of a mobile home for residential occupation and ancillary utility / dayroom to provide safe cooking and washing facilities and a single touring caravan for the occupants of the pitch to travel to find work and attend gypsy / traveller fairs...”. This development was constructed by 2019 and has since been in use until the present day – it is shown marked on the ordnance survey map as a “Travellers Site”. This site was not included in the 2022 GTAA as the permission granted for the site did not specify that it was for gypsy and traveller use.
- 4.6 The 2022 GTAA advised that separate future needs figures should be calculated for the “Ethnic” definition of a gypsy and traveller and for the planning definition (PTTS 2015 “travel for all”). The GTAA identified that Gypsies and Travellers prefer small, family-sized sites, but will accept larger sites if carefully planned and designed in consultation with the Gypsy community.
- 4.7 The largest element of calculated need was derived from expected household formation i.e. teenagers on sites who are likely to require a pitch during the Plan period and existing concealed / over-crowded households. Only a small proportion of need was derived from in-migration to the local area.
- 4.8 For travelling showpeople, the GTAA consulted 90% of the households living at authorised plots in the study area. This consultation identified a need based upon concealed and new household formation from the one existing yard within the City.
- 4.9 The 2022 GTAA notes that, in the Black Country, the number of unauthorised encampments and the number of caravans on these encampments, has gradually declined over time (2016-21). Wolverhampton makes up 17% of these encampment records and has a low average rate of eight per year over the period 2019-24. The 2022 GTAA noted that Wolverhampton had identified a potential transit site with planning permission and recommended that development of this site should proceed. A WCC-owned Gypsy and Traveller Negotiated Stopping Site at Gorsebrook Road was subsequently constructed. As of June 2025 this site has not yet been used. Therefore, there is no unmet need for such provision in Wolverhampton.
- 4.10 As part of the preparation for the WLP Issues and Preferred Options Regulation 18 Consultation (I&PO) [SD PC2] the needs figures for Gypsies and Travellers and Travelling Showpeople were updated to reflect an

extension of the Plan period to 2042, as set out in SD H01, which is replicated below:

Gypsy and Traveller pitches

Revised Table 5.15: Summary of accommodation needs 2021-42 (pitches)		
Period	Ethnic definition	PPTS 2015 'travel for all'
Total 2021-26	38	23
Total 2026-31	10	8
Total 2031-36	11	9
Total 2036-42	13	11
Total 2021-42	72	51

Source: 2022 GTAA – RRR Addendum October 2023

Travelling Showpeople plots

Revised Table 6.13: Summary of accommodation needs 2021-42 (plots)	
Total 2021-26	1
Total 2026-31	1
Total 2031-36	1
Total 2036-42	1
Total 2021-42	4

Source: 2022 GTAA – RRR Addendum October 2023

- 4.11 Applying a pro rata approach to these figures, the updated need for Gypsy and Traveller permanent pitches, using the PPTS definition, is 33 pitches up to 2032 plus 18 pitches from 2032 to 2042 – a total of 51 pitches over the WLP Plan period. The updated need for Travelling Showpeople plots is four plots up to 2042. These figures exclude existing authorised pitches / plots.
- 4.12 The 2022 GTAA recommends that calculated needs should be addressed through: capacity on existing sites; regularising unauthorised sites; intensification or expansion of existing sites; and new pitch allocations. The GTAA concluded that there is a general consensus that smaller sites are preferred due to better management and maintenance of provision and security, and consultation with stakeholders identified a need for more small, family sites.

5. Emerging Approach to Addressing Accommodation Needs

(1) Existing Site Allocation – Former Bushbury Reservoir, Showell Road

- 5.1 As part of work on the preparation of the WLP, as set out in Diagram 1 of the Site Assessment Report [SDs SI1 and SI2], all existing housing allocations

and large housing permissions not located within Wolverhampton City Centre were reviewed and carried forward into the WLP process, as appropriate. This review involved the adjustment of capacity and delivery details in line with most up-to-date evidence from the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) (2022 version for Regulation 18 and 2024 version for Regulation 19) [SD H04] and the adjustment of housing density in line with emerging WLP policies.

- 5.2 In this context, in alignment with national policy, housing uses included Gypsy and Traveller permanent pitches and Travelling Showpeople plots. There were no extant planning permissions for such uses in the 2022 SHLAA or 2024 SHLAA, however the one existing housing allocation for 12 Gypsy and Traveller permanent pitches on a privately-owned site at Former Bushbury Reservoir, Showell Road (WLP site GT1) was subject to review.
- 5.3 In 2013 the site gained full planning permission (13/00068/FUL) for infill of a former fishing pool - a designated Site of Local Importance for Nature Conservation (SLINC) - and creation of a residential caravan site with 12 pitches, including creation of a new pool as SLINC loss mitigation. The former fishing pool was then infilled, which it is considered represents an implementation of the permission – as reflected in the list of changes since submission set out in the Housing Topic Paper [ED WCC2].
- 5.4 An outline planning application (16/00674/OUT) was submitted for general purpose housing on the site by the same applicant. This application was refused, and there was no appeal. The main reason for refusal was that the site was allocated in the adopted Stafford Road Corridor AAP for 12 gypsy and traveller permanent pitches, and was the only such allocation in Wolverhampton, meaning that the loss of this site from such use would seriously undermine the 5 year housing land supply of gypsy and traveller pitch sites based on need identified in the 2017 GTAA.
- 5.5 There have been no subsequent planning applications. In the 2024 SHLAA the site was assessed as developable during 2029-32 (Site Ref 36510) and therefore forms part of the 5 year housing land supply for the WLP Regulation 19 (the 5 year period being to end March 2032, to ensure a full five year supply following anticipated WLP adoption during the 2026/27 monitoring year).
- 5.6 The maximum capacity of the site was tested in detail through the planning application process. The triangular site is bounded on two sides by railway lines and on the third side by a main road (to the south of which lies the Showell Road site). Therefore, the review (referred to in para 5.1 above) concluded that there was no scope to intensify or extend the site allocation and the existing allocation for 12 pitches was carried forward into the WLP I&PO, and subsequently the WLP Regulation 19, as set out in Table 6.

- 5.7 Further information about the site is provided in WLP Regulation 19 para 10.14 regarding loss of Site of Local Importance for Nature Conservation (SLINC) value, and in Table 12 – Housing and Employment Allocations, as set out in the extract below:

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
GT1	Former Bushbury Reservoir, Showell Road	Replaces Stafford Road Corridor Area Action Plan allocation HP5. Site of Local Importance for Nature Conservation (reservoir since landfilled). Subject to satisfactory mitigation for loss of nature conservation value / biodiversity net gain. Heritage Impact: Land between two railway lines, used in 20 th century as reservoir. No archaeological potential. Wolverhampton Locks CA and LBs are 390m to southwest. No HIS necessary. Flood Risk: Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.	Gypsy and traveller pitches	12 pitches	0.30 (G)	2024-32: 12 (2029-30: 4; 2030-31: 4; 2031-32: 4)

- 5.8 One representation regarding this site was made through the WLP Regulation 19 consultation. This was made by the Wildlife Trust for Birmingham and the Black Country, who objected to the allocation of SLINC land for development, at this site and two other sites [SD CD8a p.67 and p.122]. The WCC response was that: “Table 12 of the WLP sets out clearly which site allocations are affected by a SLINC designation and/ or currently considered to be subject to BNG, and outlines that mitigation will be required.” (p.123); and “Para 10.14 explains that there is only one WLP housing allocation which may result in loss of a SLINC (GT1 – the value of this site may already be lost due to infilling of the Bushbury Reservoir SLINC, however it has not been possible to gain access to the site for survey purposes). This site has been allocated for development because there are no other site options available for gypsy and traveller pitches in Wolverhampton. The policy requirements for this allocation are robust, ensuring that development can only go ahead if sufficient satisfactory mitigation can be secured, in line with Policy ENV1 and national biodiversity net gain (BNG) requirements (see Policy ENV3).” (p.67). National BNG requirements allow the standard BNG condition to be discharged through whole or partial off site BNG provision.

(2) Unauthorised Site – 189 Wolverhampton Road, Heath Town

- 5.9 There is one unauthorised occupied Gypsy and Traveller Pitch site in Wolverhampton, at 189 Wolverhampton Road, Heath Town (WLP site GT4). The site comprises a semi-detached house and adjoining yard accommodating two pitches. The pitches have been in operation for at least 21 years, and no planning issues have arisen from this use. The site currently has no potential for extension.
- 5.10 Therefore, in accordance with the GTAA 2022 recommendations, the WLP Regulation 19 allocates this unauthorised site for permanent use for two Gypsy and Traveller pitches.

(3) Potential to Intensify or Extend Existing Sites

- 5.11 There are two existing authorised Gypsy and Traveller Pitch sites in Wolverhampton:
- GT2: Showell Road Site – 40 pitches
- GT3: 36-38 Beckett Street, Bilston – 2 pitches
- 5.12 Site GT2 is owned by WCC and has been managed on their behalf by The Gypsy Council via a management agreement for over 30 years. The site is of a significant size, includes 40 permanent pitches, amenity blocks, recreational areas and accommodation for an on-site manager, and is widely recognised as being stable and well managed. The site is fully occupied and there is no potential to intensify use within the site boundary.
- 5.13 A Report to 11 September 2013 Cabinet on “The management and provision of gypsy and traveller pitches in Wolverhampton” [Item 10 - Gypsy and traveller pitch provision.pdf](#) sets out reasons why extending the site would not be appropriate and Cabinet agreed that the site should not be extended to provide additional pitches. An extension of the existing caravan site onto adjoining, landlocked WCC-owned land has previously been considered and discounted on more than one occasion. This land forms a buffer between the existing site and Fowlers Playing Fields Neighbourhood Park, is used periodically for horse-grazing by the Gypsy and Traveller community, and has since been subject to ecological survey and designated as Bushbury Pastures SLINC [SD EN17v]. There is a culvert between the land and the existing site, which would have to be bridged at significant cost to access the land.
- 5.14 Government best practice guidance advocates an approach that limits large sites and encourages variety of provision as far as possible. Designing Gypsy and Traveller Sites: Good Practice Guide (DCLG, 2008) states that “Sites should ideally consist of up to 15 pitches in capacity unless there is clear

evidence to suggest that a larger site is preferred by the local Gypsy or Traveller community”. Concerns have been raised locally that an extension to the current site would make the site too large, create potential management difficulties and have a negative impact on housing renewal activity underway in the adjoining Park Village area. This view was also supported by The Gypsy Council’s site manager.

- 5.15 Site GT3 is a privately owned and managed site which gained planning permission in 2012 and has been in operation since 2013. The site makes use of two semi detached houses and associated former garden land, and is surrounded by residential uses, with no potential land for extension.
- 5.16 There is one existing Travelling Showpeople yard in Wolverhampton, GT5: Phoenix Park Travelling Showpeople Yard - 4 plots. This yard was extended 10 years ago from 3 plots to 4 plots, and is surrounded by residential, permitted residential, and public open space uses. Therefore, it is currently not possible to either intensify or extend the site further.

(4) Potential New Site Allocations

Call for Sites Process

- 5.17 As part of the review of the Black Country Core Strategy in 2017, an Issues and Options and Call for Sites consultation was published for eight weeks. The Call for Sites request then remained open until 2019. At the time, a total of 361 sites were submitted for consideration across the Black Country, predominately for residential and employment uses. None of the sites that were submitted were promoted for either Gypsy and Traveller or Travelling Showpeople use. A further Call for Sites exercise was undertaken in 2020 for a period of 6 weeks. A further 56 sites were received, in addition to those submitted in the earlier Call for Sites. No sites were submitted for consideration for either Gypsy and Traveller or Travelling Showpeople use.
- 5.18 Following the decision to cease work on the Black Country Plan, work commenced on the WLP in October 2022. The Wolverhampton call for sites exercise has been continually open through the Wolverhampton SHLAA process, with a relaunch in 2023 following the commencement of WLP preparation, requesting site submissions for housing use including Gypsy and Traveller provision. Details of all the call for sites submitted for housing use through these exercises (excluding withdrawn sites) are provided in the SHLAA 2024 [SD HO4] and on the Black Country Plan “call for sites” map [SD PC17]. There were no call for sites submitted for either Gypsy and Traveller or Travelling Showpeople use.

Council-owned Land

- 5.19 As part of the on-going WCC Land Review and search for housing sites over the past 15 years, led by the Housing Development Team, consideration has been given to identifying potential sites within WCC's ownership that could provide additional Gypsy and Traveller permanent pitches. This has also drawn on the site search work which was undertaken to identify a suitable negotiated stopping place site (see para 4.9 above). The review has included a thorough assessment of surplus property; under-used garage sites; and low quality / value open spaces. No sites have yet been identified on Council-owned land which are suitable for Gypsy and Traveller permanent pitches.

Private Land

- 5.20 No owners of WLP housing site allocations without planning permission have indicated that they are willing to incorporate Gypsy and Traveller permanent pitches. No existing Wolverhampton City Centre housing allocations are suitable for pitch use, due to factors including: the need to retain and convert existing buildings; the site being suitable / appropriate for very high density development; and external funding being sought for general purpose housing. There are no further privately-owned SHLAA sites without planning permission

Site Assessment

- 5.21 Through the WLP preparation process there have been no potential new Gypsy and Traveller or Travelling Showpeople allocations to assess through the WLP Site Assessment process.

6. Wolverhampton Local Plan and Duty to Cooperate

WLP Issues and Preferred Options Regulation 18 – Feb 2024

- 6.1 The WLP I&PO Report set out the requirement for the WLP to seek to meet identified need for gypsy and traveller permanent pitches for the first five years of the Plan period following anticipated adoption in 2026/27 i.e. 2032 (see para 5.5 above). As set out in para 4.11 above, this identified need is 33 pitches, or 75 including 42 existing authorised pitches.
- 6.2 The Report explained that no deliverable gypsy and traveller permanent pitch site options were put forward for Wolverhampton through either the Black Country Plan “call for sites” or the on-going Wolverhampton SHLAA “call for sites” process which had been in operation for over ten years. Also, following a review of publicly owned land and privately-owned housing sites in Wolverhampton, no potential suitable new gypsy and traveller pitch sites had been identified. The Report therefore proposed carrying forward the existing allocated site for 12 pitches (as per the Draft Black Country Plan), and regularising two pitches on an unauthorised site, generating a 19 pitch shortfall against Wolverhampton gypsy and traveller permanent pitch need up to 2032.
- 6.3 The Report consulted on Gypsy and Traveller Pitch Growth Options (p.8), with a preferred option of exporting the 19 pitch shortfall through the Duty to Cooperate (DtC), as set out below:

Type of Option	Description of Preferred Option	Assessment of Preferred Option
Gypsy & Traveller Pitch Growth Option	Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032: • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site • 19 pitches exported through Duty to Cooperate	No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032

6.4 It was also proposed to seek to meet the remaining need of 18 pitches for 2032-42 through windfalls, and to otherwise carry forward Policy HOU4 - Accommodation for Gypsies and Travellers and Travelling Showpeople, of the Draft Black Country Plan into the WLP.

6.5 The I&PO DtC Statement [SD PC6] stated that: “Wolverhampton has evidenced a shortfall in its housing supply, and Gypsy, Traveller and Travelling Showpeople Accommodation provision. ... Wolverhampton Council therefore views that these strategic matters continue to be the principal cross-boundary issues affecting the preparation of the Wolverhampton Local Plan.” (para 2.38) and “Based on the needs assessment, it is likely that the Council will have a shortfall in meeting the need for the Plan period and will seek to address this under DtC.” (Table 2.1). South Staffordshire District as a neighbouring authority and other authorities in the Greater Birmingham and Black Country Housing Market Area were specified as DtC Prescribed Bodies for Gypsy, Travellers and Travelling Showpeople Accommodation Provision.

6.6 There were a number of responses to the Regulation 18 consultation from DtC Prescribed Bodies which related to the Gypsy and Traveller pitch shortfall, as summarised in the WLP Regulation 19 Consultation Statement [SD CD9] – see extract provided below from p.56. CD9 also provides an indication of the level of support for the Preferred Gypsy and Traveller Pitch Option (G2) – 27.3% of respondents agreed with this option, 39.4% did not agree, and 33.3% selected “don’t know”.

Preferred Gypsy and Traveller Pitch Option

Local Authorities

- (Dudley) Some allowance should be made for windfall sites as per the Dudley and Sandwell Local Plans
- (Dudley) Exporting pitches through DtC could raise issues, particularly given other nearby authorities also have shortfalls, which could create a significant shortfall across the region.
- (Walsall) There is no evidence of agreements with neighbouring authorities to contribute towards the shortfall
- (South Staffs) WLP should evidence other options have been explored: intensifying or expanding existing sites; public land for new sites; approaching owners of housing sites.

Historic England

- Any housing options for Gypsy and Traveller, Travelling Showpeople will need to consider the impact on the historic environment and be accompanied by an appropriate evidence base.

6.7 CD9 sets out (on p.64) how these main issues raised by the Regulation 18 representations have been addressed in the WLP Regulation 19 as follows: “The WLP sets out the options that have been explored to provide more gypsy

and traveller permanent pitches within Wolverhampton, including intensifying or expanding existing sites and public land for new sites. It is unrealistic to expect owners of housing site allocations to support the inclusion of gypsy and traveller pitch provision, particularly given tight viability margins on many sites.”

- 6.8 Two additional Regulation 18 consultation responses were received on Policy HOU5 Accommodation for Gypsies and Travellers and Travelling Showpeople – one from the Police & Crime Commissioner for the West Midlands (PCCWM) regarding design issues and one from the Environment Agency regarding flood risk.

Duty to Cooperate

- 6.9 Between WLP Regulation 18 consultation and WLP Regulation 19 consultation, a number of DtC activities took place relating to the WLP Gypsy and Traveller pitch shortfall, as set out below.

South Staffordshire District Council (SSDC)

- 6.10 In April / May 2024, SSDC consulted on the South Staffordshire Local Plan (SSLP) Regulation 19 and sent WCC a DtC letter requesting that WCC complete a Statement of Common Ground (SoCG) to demonstrate that the DtC had been met, in particular regarding the request that neighbouring authorities consider if they could make a contribution towards the SSLP shortfall of 125 gypsy and traveller pitches, beyond meeting their own local need for such pitches.
- 6.11 WCC responded ([South Staffordshire Local Plan Consultation Response 22 May 2024](#)) that “In terms of gypsy and traveller pitches, the WLPIPO identifies a shortfall of 19 pitches, having explored all possible site options. Given that the SSLP (2024) identifies a larger shortfall of 125 pitches, it is clear that the WLP cannot contribute towards the SSLP shortfall and the SSLP cannot contribute towards the WLP shortfall.” Cabinet approved the following principle for a response: “Acknowledge the SSLP gypsy and traveller pitch shortfall and commit to providing further evidence, through the WLP process, to demonstrate the lack of any potential sites to deliver additional gypsy and traveller pitch pitches in Wolverhampton.”
- 6.12 In July 2024 a SoCG was agreed with SSDC setting out the position relation to the SSLP and the WLP [Appendix 6 of SD CD15]. This references gypsy and traveller accommodation as a Key Strategic Matter and states that: “... WCC’s response to SSDC letter of October 2023 dated 23 January 2024 confirmed WCC’s position that it was premature to provide a City Council position on cross-boundary issues relating to gypsy and traveller pitch need and supply, as this would need to be informed by progress on the

Wolverhampton Local Plan (programmed for consultation early 2024) which would consider gypsy and traveller pitch need and supply in Wolverhampton. ... SSDC will review WCC's approach when further details are published as part of WCC's Regulation 19 Plan." (para 23). The SoCG has not subsequently been updated.

Black Country Authorities (BCA)

- 6.13 On 3 June 2024, at a regular Black Country Planning Leads Duty to Cooperate meeting [ED WCC5 Appendix 5k], WCC raised the need for a Greater Birmingham and Black Country Housing Market Area (GBBC HMA) SoCG explaining the position on housing, and suggested that this could also cover Gypsy and Traveller provision, as the WLP had a shortfall of 19 pitches at Regulation 18 stage and this was likely to remain at Regulation 19 stage - this suggestion was not subsequently taken forward.

Wolverhampton Local Plan Regulation 19 – November 2024

- 6.14 Having issued call for sites requests, assessed WCC-owned land and explored other options for Gypsy and Traveller permanent pitch provision, no additional available and suitable supply options were identified in advance of the November 2024 Publication Plan consultation. Therefore, the WLP Regulation 19 largely maintained the WLP Regulation 18 policy approach, as detailed below.
- 6.15 The WLP Regulation 19 aims to meet the accommodation needs of gypsies and travellers as defined in the PPTS, by protecting existing and approving new privately and publicly owned sites and pitches. As set out in para 6.1 above, the WLP seeks to meet identified need for 33 permanent pitches up to 2032, or 75 including existing authorised pitches. The evidence supports the following approach to seek to meet this need:
- i. safeguard existing gypsy and traveller pitches;
 - ii. allocate existing temporary or unauthorised sites for permanent use (subject to other planning considerations);
 - iii. intensify and extend existing sites, where appropriate;
 - iv. carry forward existing pitch allocations from adopted Plans;
 - v. allocate new pitches on suitable sites which have emerged since adopted Plans.
- 6.16 It is not possible or appropriate to intensify or extend existing permanent pitch sites, and no further suitable sites have emerged or been identified within Wolverhampton to address unmet need. No deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which included three "call for site" opportunities and an assessment of publicly owned land and privately-owned housing sites.

Table 6 – Supply of Gypsy and Traveller Pitches up to 2032

Source	Number of pitches
Protection of existing authorised pitches: GT2: Wolverhampton Council Showell Road Site – 40 pitches GT3: 36-38 Beckett Street, Bilston – 2 pitches	42
Allocation of existing unauthorised site for permanent use: GT4: 189 Wolverhampton Road, Heath Town – 2 pitches	2
Carried forward pitch allocation: GT1: Former Bushbury Reservoir, Showell Road – 12 pitches	12
Total Pitches	56

6.17 Therefore, the approach will deliver 56 Gypsy and Traveller permanent pitches up to 2032, as shown in Table 6 of the WLP (replicated above). **This is the chosen requirement figure for the WLP – 56 Gypsy and Traveller permanent pitches by 2032.** The requirement figure is not sufficient to meet identified need, with a remaining need for 19 pitches up to 2032.

6.18 There is scope for remaining needs up to 2032 and beyond to be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. This is consistent with past trends, where small windfall sites have come forward within the urban area, and these have been approved where in accordance with other planning policies. However, given the small numbers involved, it is not possible to guarantee that windfalls will deliver a certain number of pitches up to 2032. **Therefore, a windfall allowance has not been incorporated within the chosen requirement figure.**

Needs for which Requirement Figures have not been set in the WLP

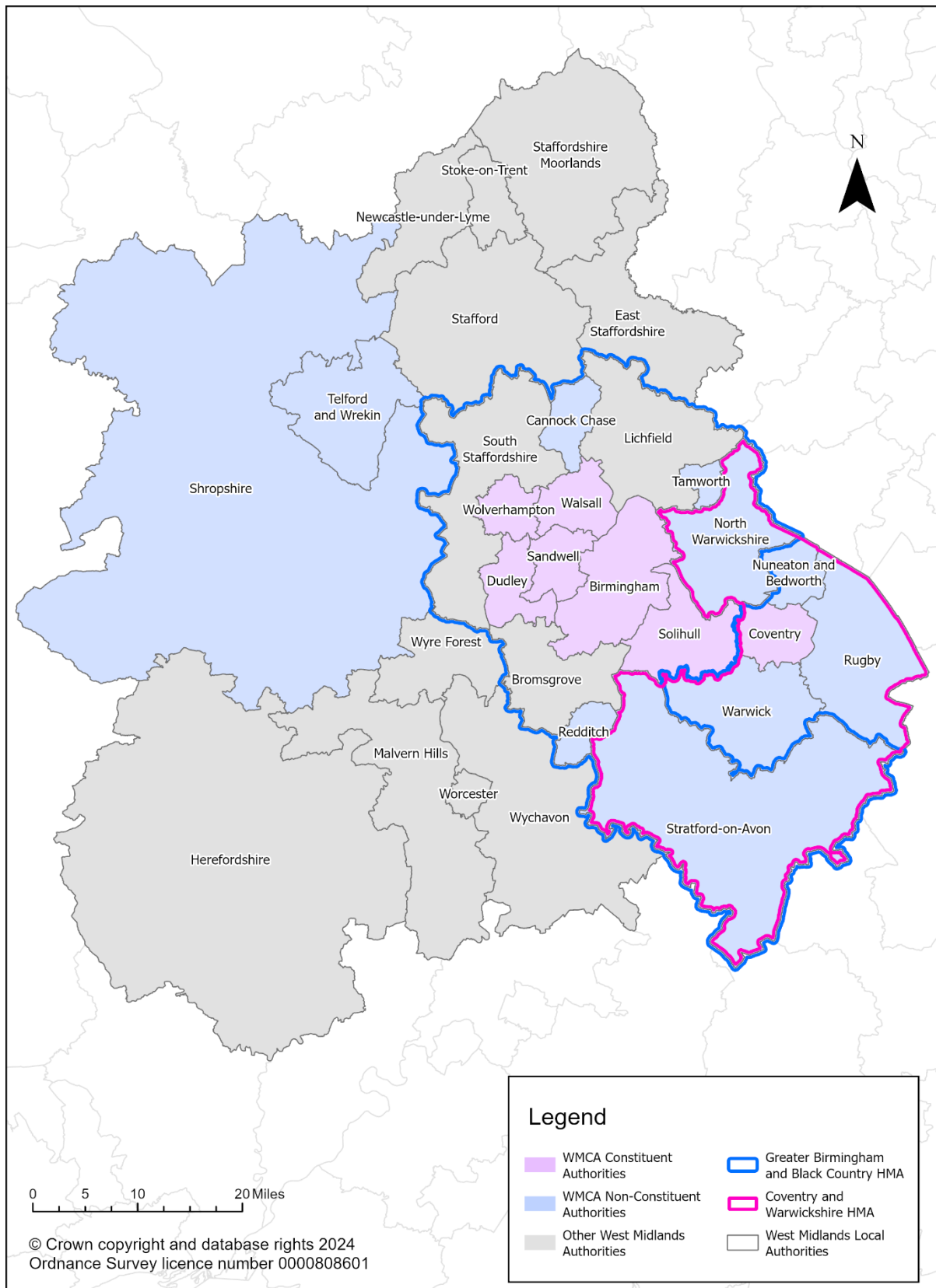
6.19 The GTAA identifies additional needs for 18 Gypsy and Traveller permanent pitches over the period 2032-42; and also a need for 21 such pitches over the Plan period for those families / individuals that do not meet the PPTS definition but who do meet the “Ethnic” definition set out in the GTAA and whose needs are not met by “bricks and mortar” accommodation. **The WLP does not set requirement figures for these needs.** The WLP Regulation 19 does however identify that there is scope for these needs to be met within the “broad location” of the urban area, through the planning application process,

with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies.

- 6.20 The GTAA identifies the need for an additional four Travelling Showpeople plots over the Plan period. There is one existing Travelling Showpeople yard in Wolverhampton, GT5: Phoenix Park Travelling Showpeople Yard - four plots. It is not possible or appropriate to intensify or extend this site. It is not possible to identify and allocate sites to meet this need, as no deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which have included three “call for sites” opportunities.
- 6.21 **The WLP does not set a requirement figure for this need.** The WLP Regulation 19 does, however, identify that there is scope for these needs to be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. This is consistent with past trends, where small windfall sites have come forward within the urban area, and these have been approved where in accordance with other planning policies.
- 6.22 In addition to specific DtC responses (see below) there were two WLP Regulation 19 responses related to gypsy and traveller accommodation - from PCCWM, supporting changes made to Policy HOU5 in response to their WLP Regulation 18 representation; and from the Birmingham and Black Country Wildlife Trust regarding GT1 (see para 5.8 above), as per the WLP Regulation 18 and with a similar WCC response.

Duty to Cooperate

- 6.23 Alongside consultation on the WLP Regulation 19, WCC wrote a DtC letter [ED WCC5 Appendix 6] to all local authorities within the GBBC HMA (Birmingham, Bromsgrove, Cannock Chase, Dudley, Lichfield, North Warwickshire, Redditch, Sandwell, Solihull, South Staffordshire, Stratford-on-Avon, Tamworth, Walsall) and other neighbouring local authorities which had a functional relationship with Wolverhampton in terms of housing or employment land (Shropshire, Telford and Wrekin, Wyre Forest, Stafford). The letter confirmed the latest position with the WLP and its supporting evidence base and set out WCC's Draft SoCG position regarding housing, gypsy and traveller pitch provision and other issues. The letter requested information to determine whether each authority was able and willing to contribute towards meeting the WCC Gypsy and Traveller permanent pitch shortfall of 19 pitches up to 2032.



6.24 Six local authorities responded to this request. **Dudley MBC** responded to the DtC letter and the WLP Regulation 19 consultation [SD CD10/R021], and subsequently a SoCG was completed [SD CD15d]. The response and SoCG set out the Dudley position, which is that Dudley is unable to contribute

towards any unmet needs of Wolverhampton and has identified its own shortfall in Gypsy, Traveller and Travelling Showpeople provision within the Regulation 19 Dudley Local Plan (October 2024). **Lichfield DC** [SD CD10/R027] responded that it is unlikely that their emerging Local Plan will be able to meet its future needs. **Walsall MBC** (SD CD10/R025A) responded that they will review the requirement for traveller sites as part of the preparation of a new Local Plan. **Stratford-on-Avon DC** (in consultation with Warwick DC) [SD CD10/R030] responded that the South Warwickshire Local Plan covering their area is at Regulation 18 stage and proposes to accommodate local need within the area. **Birmingham CC** [SD CD10/R016] responded that they are unlikely to be able to identify any other sites for gypsy and traveller provision over and above their own requirements.

6.25 In addition to the SoCG referred to in para 6.12 above, **South Staffordshire DC** [SD CD10/R023] responded that they would welcome an indication that all options to provide new pitches had been explored, including the potential to intensify or expand existing sites, using public land for new sites and sites in the Green Belt. They reiterated the South Staffordshire shortfall in pitch provision and the process it has undertaken via DtC to address this shortfall. The general WCC response related to green belt is set out on p.18-20 of SD CD8a (R045/1). A more specific response is set out on p.77: “The WLP sets out the options that have been explored to provide more gypsy and traveller permanent pitches within Wolverhampton, including intensifying or expanding existing sites and public land for new sites. It is unrealistic to expect owners of housing site allocations to support the inclusion of gypsy and traveller pitch provision, particularly given tight viability margins on many sites.”

6.26 Of those authorities which did not respond to the WLP Regulation 19 DtC letter, **Sandwell MBC, Cannock Chase DC and Telford & Wrekin MBC** have an up-to-date Local Plan position on Gypsy and Traveller Pitches which precludes them from assisting Wolverhampton, as set out below.

Local Authority (Local Plan stage)	Shortfall position	Consultation / Letter / Meeting
Sandwell MBC (at EiP)	4 pitch shortfall against 5 year need	DtC Letter June 2024 set out shortfall and requested contributions EiP Gypsy and Traveller Topic Paper confirms that “the Council is not able to help neighbouring authorities with their shortfall.”
Cannock Chase DC (at EiP)	13 pitch shortfall up to 2038 (majority within 5 year period)	EiP Gypsy and Traveller Topic Paper acknowledges that: “Cannock Chase, all neighbouring councils and Birmingham have struggled to identify sites to meet the accommodation needs of Gypsies and Travellers

		and due to this authorities are expected to try to meet their need in their own authority areas either through site identification and / or criteria based policies in their Local Plans”
Telford & Wrekin MBC (Reg 19)	6 pitch shortfall up to 2040	Reg 19 consultation March-May 2025 did not specify how the shortfall would be met.

- 6.27 North Warwickshire currently have a surplus of five Gypsy and Traveller permanent pitches against their Local Plan requirement up to 2033, as set out in their Authority Monitoring Report (AMR) 2023/24 ([N Warks AMR 2023/24](#)). When the North Warwickshire Local Plan is reviewed, and relevant GTAA evidence updated, WCC will engage in DtC discussions with North Warwickshire BC regarding their updated position. The remaining seven authorities do not currently have a published position regarding Gypsy and Traveller pitch need and supply. The Solihull AMR 2023/24 ([Solihull AMR 2023/24](#)) indicates that there is not currently a five year supply of Gypsy and Traveller pitches in Solihull, as eight pitches on allocated sites required to meet Local Plan targets up to 2027 do not yet have planning permission. The Stafford AMR 2024 confirms that the 2011-31 Stafford Plan set a target for 43 new gypsy and traveller pitches, but there have since been no pitch permissions.

Progress Since Regulation 19 Stage

- 6.28 There has been no change to the WLP Gypsy and Traveller accommodation supply position between Submission in March 2025 and July 2025.

7. Conclusions

- 7.1 The Black Country Gypsy and Traveller Accommodation Assessment (2022), and subsequent update as of 2023 for Wolverhampton, provides Gypsy and Traveller and Travelling Showpeople accommodation need figures for Wolverhampton to the end of the Plan period in 2042. This joint evidence base approach, which was originally used to support development of the BCP approach to Gypsy and Traveller accommodation, and has subsequently underpinned the Dudley, Sandwell and Wolverhampton Local Plans, demonstrates close joint working and DtC co-operation with neighbouring authorities.
- 7.2 The PPTS requires Local Plans to identify a 5 year supply of deliverable sites to meet identified needs, and developable sites or broad locations for years 6-10 and 11-15 where possible. Therefore, when developing the WLP, the initial focus was on identifying sites / pitches to allocate to meet the needs of PPTS defined Gypsy and Traveller households for permanent pitches for the 5 years after anticipated WLP adoption i.e. up to 2032.

- 7.3 The WLP process has followed the approach to meeting need recommended in the GTAA, carrying forward the existing site allocation, regularising the existing unauthorised site and concluding that there was no potential to intensify or extend existing sites or to allocate new sites. No potential sites were put forward through the BCP and WLP preparation processes, which included three focused “call for site” opportunities and an assessment of Council-owned land and privately owned housing sites. Following this approach, there will be a Gypsy and Traveller permanent pitch shortfall of 19 pitches up to 2032.
- 7.4 In accordance with the DtC, WCC has, since the publication of the WLP Regulation 18 which confirmed the shortfall position, requested contributions from neighbouring local authorities through meetings, letters and formal consultations on the WLP. To date, these DtC discussions have not generated any offers or secured any contributions. This is due in some part to the shortfall of permanent gypsy and traveller pitches arising in a number of neighbouring local authorities.
- 7.5 The WLP Regulation 19 policy approach commits WCC to respond positively to windfall proposals that accord with Policy HOU5, and to continue to work with DtC bodies to explore options for new or expanded public sites to meet our unmet need. WCC will continue to monitor the delivery of sites, including the delivery of windfall sites, to inform whether a review of the policy is needed. Although DtC requests have been unsuccessful to date, WCC will continue to engage with neighbouring authorities regarding this unmet need.
- 7.6 This approach is in accordance with the preferred Gypsy and Traveller growth option (G2) for the WLP, as consulted upon at Regulation 18 stage, and set out in the WLP Regulation 19. The impacts arising from not meeting the area’s full identified needs have been appropriately assessed through the Sustainability Appraisal of the two Gypsy and Traveller Growth Options for the WLP, as detailed in the WLP Regulation 18 Sustainability Appraisal [SD EN20] and the WLP Regulation 19 Sustainability Appraisal [SD CD3a]. CD3a concluded that: “Option G2 would be the favourable option of the two as it would meet the identified 5-year supply of Gypsy and Traveller pitches for Wolverhampton; however this option is reliant upon exporting 19 pitches to neighbouring authorities. The exported growth of small-scale Gypsy and Traveller pitches would be unlikely to cause significant adverse effects, although uncertainty remains on the likely effects of exported pitches.” (para 5.4.11)