

Winchester District Gypsy Traveller and Travelling Showpeople Development Plan
Document

'Traveller DPD'

SOUNDNESS SELF ASSESSMENT CHECKLIST

May 2018



This soundness compliance self assessment checklist is based on the Local Plan Self-Assessment Toolkit produced by the Planning Advisory Service (PAS) in March 2014. Winchester City Council has used this checklist to demonstrate that the Winchester District Gypsy, Traveller and Travelling Showpeople Development Plan Document (Traveller DPD) meets the tests of soundness as set out in the relevant legislation. The PAS toolkit template has been edited as necessary to include the Planning Policy for Travellers Sites and to reflect local circumstances.

Soundness Test and Key Requirements

Evidence Provided

Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Vision and Objectives

Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?

Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?

Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?

Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?

Are the policies internally consistent?

Are there realistic timescales related to the objectives?

Does the DPD explain how its key policy objectives will be achieved?

A [Local Development Scheme \(LDS\)](#) showing the timetable for the production of the DPDs – including that for Gypsy and Traveller Sites - has been prepared and has been kept up-to-date. The LDS details the scope and content of planned DPDs in relation to the Development Plan

The spatial planning vision for the District is set out in [Local Plan Part 1 \(Joint Core Strategy\) 2013 \(LPP1\)](#). The aim of the vision is to ensure that the District retains its distinctive characteristics and to maximise opportunities to address change in a positive way. The spatial planning objectives reflect the themes of the Community Strategy originally prepared in 2004 with regular updates. The Council has recently updated its Strategy (February 2018) which includes a Housing outcome to ensure that there is access to a range of housing options across the District.

LPP1 Policy CP5 sets out criteria in respect of gypsy and traveller site provision and this has been used to assist in the allocation of sites through this DPD.

[Local Plan Part 2 \(Development Management and Allocations\) April 2017 \(LPP2\)](#) sets the target for gypsy/traveller pitches and travelling showpeople plots covering the period of 2016 – 2031, derived from the 2016 Gypsy and Traveller Accommodation Assessment (GTAA).

The Introduction to the Gypsy, Traveller and Travelling Showpeople DPD (Traveller DPD) explains the requirements of local authorities in relation to gypsy and traveller accommodation needs and sets out the relevant plan policies that already exist (CP5 of LPP1 and DM4 of LPP2). Diagrams illustrate how the DPD fits into Winchester's Local Development Framework (LDF) and the relevant policies contained within LPP1 and LPP2. This section also makes it clear that the DPD is only concerned with that part of the Winchester District that lies outside the South Downs National Park (SDNP).

The objectives of the Traveller DPD seek to address the issue identified (ie the

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| | <p>accommodation needs of travellers). This purpose is clearly expressed in the Introduction in two bullet points which specifically state the identification and allocation of a 5 yr supply of deliverable sites, together with a strategy to accommodate growth in yrs 6-10 and where possible in yrs 11-15, in accordance with Policy DM4 and the advice set out in the government’s Planning Policy for Traveller Sites (PPTS). The purpose is also set out to ensure the identified plots/pitches reflect the requirements of Policy CP5.</p> <p>Section 4 of the Traveller DPD sets out the strategy to fulfil these objectives by means of a number of policies TR1-TR6. The strategy involves a combination of safeguarding existing sites, providing for additional provision through intensification where appropriate, along with some site allocations for showpersons sites.</p> <p>Policy TR1 lists existing sites that should be safeguarded and identifies pitch/plot numbers on these. Policy TR2 regularises 3 named temporary sites and identifies pitch numbers. Policies TR3 & TR4 allocate 2 sites for travelling showpersons. Policy TR5 allows for additional provision on the sites identified in Policies TR1-TR4 including allowing for any additional showpersons’ plots required to meet the need. Section 4 of the Traveller DPD also commits the Council to monitor provision to consider meeting any further identified needs for travelling showpeople and transit site that may emerge during the plan period. Policy TR6 provides guidance for the design and layout of sites.</p> <p>The Plan is positively prepared as it sets out a strategy to accommodate the quantity of growth to meet, so far as possible, the identified objectively assessed needs for gypsy and traveller provision that are set out in LPP2 policy DM4.</p> |
| <p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i> Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> | <p>The accommodation needs of the Traveller DPD plan area were established in the Winchester Gypsy and Traveller Accommodation Assessment (GTAA) 2016 and the recommended pitch/plot targets were included in Policy DM4 of LPP2. The GTAA and LPP2 policy remain relevant and up-to-date and the Traveller DPD does not seek to re-visit the pitch/plot targets. These remain as established in LPP2 policy DM4.</p> |

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| <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p> | <p>The Traveller DPD outlines a strategy to provide for the needs identified in the Accommodation Assessment in a manner that is consistent with the overall strategy and pitch/plot targets for the District as outlined in LPP1 and LPP2.</p> <p>The policies set out at TR1-TR6 of the Traveller DPD meet the objectively assessed needs where possible, mainly by site allocations (TR1-TR4), with flexibility for additional provision at these locations subject to criteria (TR5).</p> <p>Although it has not been possible to fully satisfy Government policy in relation to meeting travelling showpersons’ needs in full, due to a lack of available sites, the DPD and Local Plan provide a positive policy framework for the consideration of suitable sites which may come forward in the future.</p> |
| <p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p> | <p>Sites identified in the DPD already exist and Policies TR1-TR4 provide planning policy guidance on specific sites. Policy TR5 allows for necessary additional development where there is a demonstrable need and a lack of alternative provision, taking into account the specific circumstances of the applicant.</p> |
| <p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p> | <p>The Traveller DPD is topic-specific and only deals with the accommodation needs of the travelling community. The evidence is the Winchester Gypsy and Traveller Accommodation Assessment (GTAA) 2016 which identified the needs for gypsy and traveller accommodation. This was quantified and established in the Development Plan through Policy DM4 of LPP2.</p> <p>The Traveller DPD makes it clear that the needs of those who no longer fall within the definition of travellers (PPTS 2015) will be considered as part of the SHMA during the review of the Local Plan which is commencing later in 2018.</p> <p>A number of technical assessments of the sites were undertaken to identify sites to meet the OAN. Firstly as part of the Gypsy, Travellers and Travelling Showpeoples Site Assessment Study July 2016. Sites were also subject to a series of Transport Assessments and other assessments of their suitability in July 2017</p> <p>The Sustainability Appraisal SA/SEA assessed proposed sites, including those</p> |

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| | <p>submitted at the 'call for sites' stages and informed the selection of appropriate sites.</p> <p>The site selection process and results are discussed at Cabinet (Local Plan) Committee Report CAB2947(LP)June 2017.</p> <p>A series of consultations have been carried out from the commencement and first 'call for sites' in 2016, an initial options consultation was carried in spring 2017, the Draft Plan was consulted on in the summer of 2017, and the Publication Plan (Pre-Submission) consultation was undertaken in January 2018. At each stage all statutory and general consultees and others with an interest in the DPD were consulted. The Council also specifically contacted travelling organisations and site owners/occupiers.</p> <p>Details of the consultations undertaken and the responses received are found in the consultation statements produced at various stages of the DPD preparation:</p> <p>Draft Plan (Reg 18) Consultation Statement 2017</p> <p>Publication (Reg 19) Consultation Statement Jan 2018</p> <p>Reg 22 Submission Statement</p> <p>A report on matters raised during the Reg 19 consultation also forms part of the Submission Background Paper May 2018.</p> <p>The various calls for sites and site assessments did not identify sufficient travelling showpersons' sites to fully satisfy the OAN. Requests have been made of neighbouring authorities seeking assistance in meeting the accommodation needs of travelling showpersons. The Duty to Cooperate Statements illustrate how cross-boundary issues – including the accommodation of gypsy and traveller OAN -have been considered.</p> <p>Duty to Cooperate statements and updates have been prepared and published as the plan has progressed:.</p> <p>Duty to Cooperate Part 1 (Draft Plan 2017)</p> |

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| | Duty to Cooperate Part 2 (Publication 2018) Duty to Cooperate Part 3 (Submission Update) |
| NPPF Principles: Delivering sustainable development | <p>Government policy in relation to travellers is contained within the Planning Policy for Traveller Sites (PPTS) August 2015, considered later in this assessment.</p> <p>Having regard to the need to be proportionate and relevant, it is not necessary to assess the Traveller DPD against all aspects of the NPPF, however selected parts of the NPPF are covered below where they are considered relevant.</p> |
| 1. Promoting sustainable transport (paras 29-41) | |
| <p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29).</p> <p>Support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> | <p>Policy CP5 of LPP1 and new policy TR6 consider the accessibility of sites. The site assessment process for the Traveller DPD contained transport assessments of sites and the SA/SEA considers accessibility.</p> <p>Sites are often located on the edge of settlements or near to settlements to facilitate access to a range of facilities and services.</p> |
| 2. Requiring good design (paras 56-68) | |
| <p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p> | <p>LPP1 includes general design principles in CP13. CP5, which specifically deals with gypsy and traveller applications, cross refers to the design policies of the plan and supplementary planning guidance. LPP2 also contains more detailed design policies at DM14-DM17.</p> <p>Policy TR6 of the Traveller DPD contains specific design and layout guidelines for traveller sites, adding relevant detail to Policy CP5.</p> |
| 3. Promoting healthy communities (paras 69-77) | |

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| Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69). | <p>Policy CP5 encourages the provision of traveller sites well related to existing communities so that facilities and services are easily accessible, whilst having regard to local amenities of the area and the existing community.</p> <p>Policies TR2 – TR6 identify specific matters to be considered, including access requirements and provision of adequate amounts of safe open space on site for children.</p> |
| Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73). | LPP1 Policy CP5 seeks provision of play space for children and Policy TR6 specifically requires an area for safe children’s play that avoids conflict with vehicles on the site. The sites covered by the DPD are too small to resolve wider open space deficits, which are generally addressed in LPP2. |
| 4. Meeting the challenge of climate change, flooding and coastal change (paras 93-108) | |
| Minimise vulnerability to climate change and manage the risk of flooding (99) | <p>LPP1 Policy CP17 covers flooding and flood risk matters. The site assessments took into account the location of flood zones as possible constraints. The SA/SEA also considered this aspect.</p> <p>CP5 of LPP1 refers to acceptable standards of water supply and drainage. Policy TR6 also seeks details of waste water and surface water drainage, incorporating SUDS where possible.</p> |
| Take account of marine planning (105) | <p>Being a statutory consultee, the Marine Management Organisation has been consulted on the various version of the Traveller DPD. The Council has received standard responses from the MMO on each occasion, concluding that there were no implications for the Marine Planning Area arising.</p> <p>The Duty to Cooperate Statements provides more information on this:</p> <p>Duty to Cooperate Part 1 (Draft Plan 2017)</p> <p>Duty to Cooperate Part 2 (Publication 2018)</p> <p>Duty to Cooperate Part 3 (Submission Update)</p> |

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| Manage risk from coastal change (106) | n/a |
| 5. Conserving and enhancing the natural environment (paras 109-125) | |
| Protect valued landscapes (109) | <p>The strategy and main policies for the natural environment are located in LPP1 at CP15 (Green Infrastructure) CP16 (Biodiversity) CP17 (Flooding) CP18 (Settlement Gaps) CP19 (South Downs National Park) and CP20 (Heritage and Landscape Character)</p> <p>LPP2 adds more detail to these policies in Policies DM14 local distinctiveness, DM15 site design criteria, DM22 rural character, DM23 special trees, important hedgerows and ancient woodlands.</p> <p>CP5 of LPP1 makes it clear that gypsy and traveller proposals should take into account the Development Plan as a whole.</p> <p>Landscape assessments formed part of the assessments of traveller sites and landscape impact is considered as part of the SA/SEA. CP5 and policy TR6 specifically relate to the protection of visual amenity, the character of the area and the need for landscaping, screening and boundary treatment</p> |
| Prevent unacceptable risks from pollution and land instability (109) | <p>LPP2 includes a number of development management policies that cover these matters relating to various forms of pollution at DM16 – DM20.</p> <p>Potential traveller sites were checked for contamination issues as part of the site assessment process and the SA/SEA. LPP1 Policy CP5 refers to the need to consider pollution impacts, such as noise, vehicle movements and light pollution and also the provision of acceptable standards on the sites in relation to water supply, drainage and recycling/waste management.</p> <p>Policy TR6 includes specific criteria on waste water and waste storage and disposal. The need to minimise external lighting is also included.</p> |
| Planning policies should minimise impacts on biodiversity and geodiversity (117) | LPP1 policy CP16 addresses biodiversity conservation and impacts. TR6 requires avoidance of harm to biodiversity interests. A specific reference is |

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| <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p> | <p>made to the Solent Recreation Mitigation Strategy, which seeks to mitigate the affects of new residential development on the Solent SPA. Traveller sites within 5.6km of the Solent SPA will be expected to make appropriate contributions to mitigation measures. Appendix D of the Traveller DPD lists those sites that lie within 5.6km of the SPA and para 1.9 of the document specifically refers to this matter.</p> |
| <p>6. Conserving and enhancing the historic environment (paras 126-141)</p> | |
| <p>Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)</p> | <p>LPP2 policies DM24-DM31 provide guidance relating to the historic environment. Policy CP5 refers to the protection of the built environment. Historic designations and assessment of any impacts on heritage assets or their settings formed part of the detailed analysis in the site assessment process and was also covered in the SA/SEA. Policy TR6 requires avoidance of harm to the significance or setting of heritage assets.</p> |
| <p>7. Facilitating the sustainable use of minerals (paras 142-149)</p> | |
| <p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p> | <p>The presence of minerals and waste sites was scoped as part of the site assessment process. Hampshire County Council have been consulted as a statutory consultee as the minerals and waste authority. No adverse impacts were found.</p> |
| <p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be ‘justified’ a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. | |
| <p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all</p> | <p>The Council has an adopted Statement of Community Involvement from 2007. This is in the process of being updated. However, most of the inclusive</p> |

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| interested parties? | <p>consultation principles within it remain relevant. The consultation process undertaken – including early participation – follows the SCI principles. The process exceeds the existing SCI in that more use has been made of up-to-date participation techniques such as an on-line consultations tool (Citizen Space) and wide use of social media (Council Website, Facebook, Twitter).</p> <p>Equalities Impact Assessments (EqIA) have been undertaken at the Draft, Publication and Submission stages of the plan to ensure that the special characteristics of travellers are taken account of in an inclusive manner and that no discrimination has occurred.</p> <p>Engagement with the travelling community from an early stage has informed the DPD. Travellers have been actively involved via surveys and interviews for the Accommodation Assessment (GTAA).</p> <p>The Reg 18 Consultation Statement provides details of all those consulted from the commencement of the DPD in October 2016 to publication of the draft DPD in July 2017. This also includes examples of the E-bulletin, press releases and letters issued.</p> <p>The Council has made extensive use of the Council’s website and social media including Facebook and Twitter, which has assisted in reaching the travelling community, the Traveller Movement and the Friends Families and Travellers groups were specifically contacted and gave support to the DPD.</p> <p>Councillors were involved in the preparation of the plan. The initial findings of the call for sites and the Site Assessment Study were discussed by the Cabinet (Local Plan) Committee in February 2017 (CAB2904(LP) refers). The Council’s Cabinet (Local Plan) Committee considered the findings of the options consultation and agreed the draft plan for consultation in June 2017 (CAB2947(LP) refers).</p> <p>The Cabinet (Local Plan) Committee considered the representations made at its meeting in December 2017 (CAB 2965(LP) refers) and full Council approved an amended DPD for pre-submission publication and subsequent submission.</p> <p>A Parish Council briefing was also held on 24th July 2017 which was attended</p> |

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| | <p>by members of Parish Councils along with some District Council members.</p> <p>The Consultation Statement as updated provides further details of the consultations undertaken:</p> <p>Consultation Statement (Reg 19)</p> <p>Reg 22 Submission Statement</p> |
| <p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p> | <p>The general evidence base for LPP1 and LPP2 is still valid in terms of the general background to the Traveller DPD:</p> <p>http://www.winchester.gov.uk/planning-policy/evidence-base/</p> <p>The GTAA 2016 was the key element of that evidence base as it recommended the pitch and plot numbers, and an approach to transit needs, which underpinned the pitch/plot numbers and approach to traveller planning set in DM4 of LPP2.</p> <p>The GTAA reflects government guidance in the PPTS 2015, in particular the revised definition of travellers. The Assessment involved surveys and interviews with travellers and detailed consideration of the composition of family groups on particular sites as part of assessing needs and capacity.</p> <p>The Accommodation Assessment was prepared by consultants acting on behalf of a consortium of Hampshire authorities including Test Valley, Fareham, Gosport, Havant, New Forest District Council and National Park Authority. It remains sound, credible and up to date although, in any event, the pitch/plot targets are now established in the Development Plan through LPP2 policy DM4.</p> <p>The other key evidence study is the Gypsies and Travellers and Travelling Showpeople Site Assessment Study (PBA) which assessed potential sites to meet the need originally identified in the 2013 Traveller Accommodation Assessment for Hampshire. This study was jointly produced with East Hampshire District Council and the South Downs National Park Authority. This</p> |

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was therefore able to be used as part of the evidence base for the 3 adjoining authorities.

The Site Assessment Study considered whether particular sites were available and suitable for particular types or travellers and the capacities of each of the sites. The Site Assessment was based on the needs identified in the 2013 Hampshire TAA, so provides a useful assessment of potential sites including those in public ownership, although subsequent investigations with land owners revealed these sites are not available for traveller accommodation.

Given that the sites identified in the DPD are already in use and in private occupation further site assessment has been limited. Detailed transport analysis of sites was undertaken and forms part of the evidence base and where appropriate the policies have been amended to reflect any access issues arising.

The sites were subject to a sustainability appraisal, which considers how the evidence supports the strategy. It includes detailed assessment of the sites against sustainable objectives. SA/SEA were undertaken in an iterative manner from start of process and are documented at :

[Draft Plan SA 2017](#) and [Appendices](#)

[Publication SA 2018](#)

[Submission SA Update 2018](#)

The plan has been informed by a series of consultations at various stages which underpin and support the DPD. Details are set out in the various consultation statements:

[Draft Plan \(Reg 18\) Consultation Statement 2017](#)

[Publication \(Reg 19\) Consultation Statement Jan 2018](#)

[Submission \(Reg 22\) Statement May 2018](#)

The initial options consultation showed broad support for a strategy of retaining existing sites and intensification on existing sites as reported to the

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| | <p>Cabinet (Local Plan) Committee on 30th June 2017 and summarised at paragraphs 2.13-2.16 of the Reg 18 Consultation Statement. The consultation on the Draft Plan raised no objections to the overall strategy and approach taken.</p> <p>There was an objection from the National Federation of Gypsy Liaison Groups in relation to the methodology of the ORS study. The pitch/plot targets were already established in LPP2, but the Council and ORS consider that the methodology was appropriate and this is discussed in Appendix A to CAB 2965(LP) Local Plan Committee December 2017.</p> <p>Taken as a whole, these sources of information represent sound and up-to-date evidence on the situation regarding availability, suitability and deliverability of sites that can be used as the evidence base for the Traveller DPD.</p> |
| <p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p> | <p>The quantum of plots/pitches required has been established in policy DM4 of LPP2. The main purpose of the Traveller DPD was to identify sites to meet the identified need and to provide flexibility to meet any unexpected need that may arise during the plan period.</p> <p>The search for appropriate sites to fulfil gypsy and traveller needs has been ongoing for several years and pre-dates the Traveller DPD. It was intended to include sites in LPP2 and the (earlier 2013 Hampshire TAA) requirement was included in the 'call for sites' for that plan and as part of discussions with Parish Councils. Only one additional site was identified and included within the draft LPP2 (Policy CC2 refers), however this site was subsequently withdrawn by its owner.</p> <p>The Site Assessment Study (PBA 2016) sought sites to fulfil the need (from the earlier 2013 Hampshire TAA) for gypsy and traveller provision. This included looking at existing sites, a 'call for sites' and an assessment of the potential of public land.</p> <p>A further 'call for sites' formed part of the initial Reg 18 commencement process between October – December 2016 and results were reported to the Local Plan Committee in February 2017(CAB2904(LP) Appendix A). No sites</p> |

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were put forward at that stage.

An initial 'options' consultation on issues for the Plan was undertaken in spring of 2017. This specifically sought options to meet the identified need and any opportunities for extra pitches/plots. This results of this broadly supported making use of existing sites and did not reveal any new sites. Given the lack of available alternative sites, the draft DPD proposed a strategy based on the use of current existing sites. The SA/SEA (see below) assessed the sustainability of the potential sites against a series of criteria, showing clearly how the different sites perform.

Transport assessments were undertaken on all of the sites ([link](#)) and further detailed analysis by officers was undertaken on the landscape, historic environment where necessary on particular sites. The results are discussed in the [Site Assessment Methodology Background Paper](#).

The report to the Cabinet (Local Plan) Meeting of June 2017 referred to above ([CAB2947\(LP\)](#)), outlines the assessment process taken and explains how and why the preferred approach was arrived at. The strategy was confirmed and accordingly the Draft Plan was consulted on between July-September 2017.

Two additional sites were promoted during the consultation on the Draft Plan. These additional gypsy sites were not required as needs were planned for as part of the strategy, however they were assessed against the site criteria (Local Plan Committee Report December 2017 [CAB2947\(LP\)](#) Appendix B(ii) refers).

With regard to travelling showpersons, it was clear there was a shortfall and no new sites coming forward. The Council investigated the acquisition of land for such a purpose, but no suitable sites could be found (Local Plan Committee Report December 2017 [CAB2947\(LP\)](#) Appendix B(i) refers).

Responses to consultations provided information regarding the constraints, circumstances and deliverability of sites. This helped inform some of the detailed site requirements on sites identified in Policy TR2, TR3 and TR4. The Consultation Statements at [Reg 18](#), [Reg 19](#) and the update at [Reg 22](#) provide further information on how consultations have influenced the plan.

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| | <p>The selection of sites was informed by the Sustainability Appraisal from an early stage. SA/SEA has been undertaken in an iterative manner from start of process, it includes initial scoping, and assessment of potential sites against sustainability objectives and further assessments of the Draft and Submission DPDs. The Sustainability Appraisal identified some potential negative effects and suggested mitigation that was incorporated within the Draft DPD. See the statements below for further details:</p> <p>Draft Plan SA 2017 and Appendices</p> <p>Publication SA 2018</p> <p>Submission SA Update 2018</p> <p>Taken as a whole, the various site assessment processes represent a sound assessment of the suitability, availability and achievability of sites.</p> |
| <p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored | |
| <p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? | <p>The strategic vision and objectives for Winchester District are set out in LPP1 at Section 2. The introduction to the Traveller DPD illustrates the relationship between the Local Plan (Parts 1 and 2) and the Traveller DPD.</p> <p>The specific objectives for the Traveller DPD are set out at paragraph 1.3. The strategy for meeting these objectives is clearly set out in Section 4 of the DPD.</p> |

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| <ul style="list-style-type: none"> Does the DPD explain how its key policy objectives will be achieved? | <p>The Traveller DPD has been checked for internal consistency and for consistency with LPP1 and LPP2. The SA also considered this as part of its assessment.</p> <p>The deliverability and availability of sites was part of the assessment criteria for site selection and was also considered by the SA. The relevant delivery agencies have been consulted through the course of the development of the Plan as detailed in the Consultation Statements (Reg 18 and Reg 19).</p> <p>The Local Development Scheme was updated in December 2017 and reflects the most up to date timetable and relationship between this DPD, the existing LPP1 and LPP2 and other LDF documents, including the Denmead Neighbourhood Plan. The LDS includes a programme for the review of LPP1 and LPP2.</p> |
| <p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> Have the infrastructure implications of the policies clearly been identified? Are the delivery mechanisms and timescales for implementation of the policies clearly identified? Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the policies? | <p>The site assessment process included considering any infrastructure requirements or constraints. Appendix E of the DPD summarises the criteria considered and the PBA Site Assessment Study provides a detailed analysis. All sites were subject to Transport Assessments and sites were assessed for detailed environmental, landscape and historic environment impacts where initial assessments indicated there may be issues.</p> <p>The individual site allocations are non-strategic in nature and no major issues relating to infrastructure provision were identified. The SA further analysed these issues and did not identify any constraints that could not be adequately overcome with mitigation, where required.</p> <p>The statutory undertakers and infrastructure delivery agencies have been consulted throughout the preparation of the DPD. The Consultation Statement provides summaries of any responses received.</p> <p>The sites identified are already occupied by travellers. Given this there are not considered to be any major barriers in relation to delivery of the sites.</p> |
| <p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies</p> | <p>The Traveller DPD broadly reflects the aims and objectives of the Community Strategy and the strategic Local Plan (Part 1), particularly in terms of the</p> |

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| <p>for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p> | <p>provision of housing to meet the District's needs. The SA considered the DPD in relation to sustainability in its widest sense, including economic and social considerations.</p> <p>An Equalities Impact Assessment (EQIA) has been carried out in respect of the Traveller DPD to ensure inclusivity and that no discrimination has occurred. In carrying out the EQIA the Council has had regard to its obligations relating to the Public Sector Equalities Duties and the status of Gypsies and Travellers as groups with protected characteristics.</p> <p>Additionally, the Council is aware of its obligations under the Housing Acts with regard to housing those in need, particularly children and those who may no longer fall within the revised definition of travellers. These situations will be dealt with on a case-by-case basis when considering planning applications.</p> <p>The Council has kept the local settled communities aware of the Traveller DPD through extensive consultation as outlined in the Consultation Statements. A Parish Briefing has also specifically been held to liaise with the Parish Councils. The consultations have indicated broad support for the strategy adopted within the DPD.</p> |
| <p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? | <p>Some of the sites identified for gypsy and traveller provision have capacity to accommodate additional needs that may arise and this has been built into consideration when identifying sites. This promotes flexibility. Policy TR5 allows for the consideration of additional pitches/plots on the sites covered by policies TR1-TR4 where there is a demonstrable need, subject to the provisions of TR6 and LPP1 Policy CP5.</p> <p>The SA includes a section on monitoring and Appendix F of the DPD sets out a comprehensive monitoring framework which includes reference to spatial objectives and SA/SEA objectives, with a target and indicator for each policy, together with a suggested data source.</p> <p>The monitoring framework guides the assessment of the effectiveness of policies. Information contained in the AMR will show where policies may need to be reviewed.</p> |

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| | Consideration of the robustness of the plan as a whole and the policies within it is part of the SA analysis. |
| <p><i>Co-operation</i></p> <ul style="list-style-type: none"> • Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? • Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? | <p>Initial evidence base work was undertaken in association with neighbouring authorities. The GTAA was undertaken by a group of 7 Hampshire authorities and the Site Assessment Study was completed on behalf of Winchester City Council, East Hampshire District Council and the South Downs National Park Authority. A Hampshire wide Gypsy, Traveller and Travelling Showpeople Summary has also been produced by ORS, illustrating the collaborative and consistent approach undertaken to the assessment of traveller needs.</p> <p>Neighbouring authorities have been approached formally and informally as part of the duty to co-operate process. It has been necessary to request neighbouring authorities to accommodate some of Winchester's unmet need in respect of travelling showpersons accommodation. However, none have been able to do so. It is recognised that these authorities also have a lack of sites for their own requirements and that the National Park has particular environmental constraints to development.</p> <p>The DPD outlines an approach to monitoring the situation in respect of travelling showpersons' provision and to considering any applications for sites/plots having regard to need. Policy TR6 and other Local Plan policies will be used to assess any such applications.</p> <p>The Duty to Cooperate statements are as follows:</p> <p>Duty to Cooperate Part 1 (Draft Plan 2017)</p> <p>Duty to Cooperate Part 2 (Publication 2018)</p> <p>Duty to Cooperate Part 3 (Submission Update)</p> |
| <p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) | <p>The estimate need for / delivery of gypsy and traveller pitches/plots throughout the plan period is given at 2.11of the DPD. The requirements are set out in relation to 5 years periods.</p> <p>Paragraphs 4.25 and 4.26 of the DPD sets out the approach to implementation</p> |

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| <p>and are these linked to the production of the annual monitoring report?</p> <ul style="list-style-type: none"> • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? | <p>and monitoring. Appendix F of the DPD includes a comprehensive monitoring framework which cross refers to the Sustainable Community Strategy and the SA/SEA objectives. The monitoring framework includes indicators and targets.</p> <p>As discussed at paragraph 4.19, the Council will keep the situation relating to travelling showpersons' provision under review and will report on this through the AMR.</p> <p>As discussed at 4.21-4.24, it is intended to keep the situation regarding transit site under review. A review is planned for autumn 2018, as recommended by the GTAA, 3 years post the PPTS guidance.</p> <p>The delivery of pitches/plots will be reported in the AMR along with the 5-year pitch/plot supply situation. The annual update includes assessment against the targets and will identify any need to revise or review the Plan.</p> |
| <p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p> | |
| <ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? | <p>The policies and proposals within the Traveller DPD are considered to comply with the NPPF, although it is limited in its applicability to this single issue topic. The section on NPPF Principles in this Self-Assessment includes a commentary where the NPPF policies are considered most relevant to the DPD.</p> <p>The main relevant national planning policy guidance is contained within the PPTS and a detailed analysis of how the Traveller DPD complies with this is provided below.</p> <p>The SA has considered the developing policies of the Traveller DPD against the NPPF and the PPTS in particular.</p> |
| <p><i>Integration of marine and terrestrial planning</i></p> | |

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| <p>This section of the PAS Self-Assessment Checklist considered marine planning, particularly the local Marine Management Organisation (MMO) and the national Marine Planning Statement (MPS)</p> | <p>Winchester District is one of the local authorities listed as having some overlap with the marine planning area. The ‘marine’ area of the District is very small and limited to the tidal section of the River Hamble where it falls within the Winchester District. The Council has consulted the MMO on the various versions of the Traveller DPD. The Council has received standard responses from the MMO on each occasion, concluding that there were no implications for the Marine Planning Area arising.</p> <p>The Duty to Cooperate Statements provides more information on this:</p> <p>Duty to Cooperate Part 1 (Draft Plan 2017)</p> <p>Duty to Cooperate Part 2 (Publication 2018)</p> <p>Duty to Cooperate Part 3 (Submission Update)</p> <p>The locations of the gypsy and traveller sites identified in the DPD are some distance from the marine planning area. Given their location, and the small scale of development being proposed, it is considered that the Council has undertaken appropriate actions to address potential issues relating to marine planning, having regard to being proportionate. Continued liaison with the MMO will ensure that any particular issues arising will be addressed.</p> |
| <p><i>Planning policy for traveller sites</i></p> | |
| <p>The government policy in respect of traveller is to ensure fair and equal treatment in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settlement community</p> | <p>The GTAA involved engagement and surveys with the travelling community to identify their accommodation needs as appropriate. The resulting pitch/plot requirements are incorporated into LPP2 (policy DM4).</p> <p>Policy CP5 of LPP1 specifically refers to the location of sites in relation to existing communities.</p> <p>An EQiA has been undertaken for the Traveller DPD to ensure that the protected characteristics of travellers are taken account in decision-making.</p> |
| <p>Policy A: Using evidence to plan positively and manage development</p> | |

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| <p>(para 7)</p> <p>Early and effective community engagement with both settled and traveller communities.</p> | <p>Evidence base work to ascertain travellers' accommodation needs has been ongoing for a period of time. Early engagement included work by the charity Forest Bus which included active engagement with travellers to assess their accommodation needs and fed into the 2013 Traveller Accommodation Assessment for Hampshire.</p> <p>Further engagement with traveller groups was undertaken for the more recent GTAA 2016, and as part of the assessment of traveller needs. This included interviews with the occupiers of all traveller sites known at the time, where possible.</p> <p>Specific efforts were taken to engage with traveller groups as part of the preparation of the Traveller DPD. Useful contact was made with groups via social media, including the Traveller Movement and the Friends Families and Travellers. Letters were written individually to the known site occupiers.</p> <p>The Consultation Statement (Reg18) provides details of how this was undertaken.</p> |
| <p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas, working collaboratively with neighbouring local planning authorities.</p> <p>Use a robust evidence base to establish accommodation needs</p> | <p>The GTAA 2016 included a detailed assessment of the needs of gypsies, travellers and travelling showpersons for accommodation in the Winchester District outside the SDNP. This involved assessment of likely future needs over the plan period, such as the changing composition of families and likely new household formations, including assessment of those likely to cease travelling.</p> <p>The need for permanent sites and the appropriate size of those sites to accommodate particular groups and the preference for particular locations was also examined.</p> <p>The need for transit sites was also assessed and it is part of the evidence base that ongoing monitoring is required to adequately assess and plan for</p> |

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| | <p>requirements</p> <p>The GTAA engaged with travellers to ascertain their existing and anticipated future needs for accommodation. This included consideration of the make-up of family groups on sites and the needs of those who no longer meet the definition of traveller in the PPTS. The GTAA provides further detail of this.</p> <p>The GTAA was commissioned jointly with 7 Hampshire authorities. Similarly, the Site Assessment Study was commission by 3 authorities..</p> <p>Engagement with neighbouring authorities, as part of the duty to cooperate, has been ongoing through the preparation of the DPD. The Duty to Cooperate Statements below provide more details of this, in addition to the various requests for assistance to meet the unmet needs of travelling showpeople in the Winchester District.</p> <p>Duty to Cooperate Part 1 (Draft Plan 2017)</p> <p>Duty to Cooperate Part 2 (Publication 2018)</p> <p>Duty to Cooperate Part 3 (Submission Update)</p> |
| Policy B: Planning for traveller sites (paras 8-13) | |
| <p>Set pitch targets & plot targets</p> <p>Identify specific deliverable sites for 5yrs</p> <p>Update this annually</p> <p>a) Identify sites (or broad location's for yrs 6-10 & where possible, for yrs 11-15)</p> | <p>Pitch and plot targets for gypsy and traveller provision have already been set by Policy DM4 of LPP2, namely; 15 gypsy and traveller pitches and 24 plots for travelling showpeople. It is not the aim of the Traveller DPD to re-visit pitch/plot requirements as these are up to date.</p> <p>Policies TR1-TR4 of the DPD identify specific deliverable sites to fulfil the pitch requirements for gypsies and travellers for the first 5 years of the plan. The current 5-year land supply position is set out at paragraph 10.18 in The Cabinet (Local Plan) Committee Report CAB2947 and will be updated regularly</p> |

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| <p>b) Consider joint plans</p> <p>c) Relate no of pitches & plots to the circumstances of the specific size and location of the site and the surrounding population's size & density</p> <p>Protect local amenity & environment</p> | <p>in the AMR.</p> <p>Policies TR1-TR4 also identify sites to meet the identified need for pitches (as set out in DM4) over the period of the plan.</p> <p>There is currently a shortfall in plot provision in relation to travelling showpersons' sites over the plan period. Calls for sites were repeatedly undertaken, neighbouring authorities were asked to help accommodate the unmet need and the Council investigated purchasing land to accommodate the need. All these measures proved unsuccessful, but all reasonable measures have been explored.</p> <p>The background to this is discussed at paragraphs 10.31-10.34 of Cabinet (Local Plan) Committee Report CAB2947(LP)June 2017.</p> <p>The DPD and Policy CP5 provides a positive policy position against which to consider proposals for travelling showpersons plots as and when they are submitted to the Council for consideration.</p> <p>The GTAA and PBA's assessment of potential sites were both undertaken with a number of adjacent authorities, as described elsewhere in this Self-Assessment and in the Duty to Cooperate Statements. Although a joint plan was not prepared, it proved possible for the GTAA to be commissioned jointly and it identifies specific targets for the individual Districts, including separating out that part of the Winchester District that falls within the South Downs National Park and so would not be covered by this DPD. Further liaison has been undertaken under the Duty to Cooperate.</p> <p>The site assessment process and the SA considered potential pitches and plots in relation to the size and location of the sites. All sites were assessed having regard to their impact on nearby existing communities.</p> <p>The site assessment process and SA also included consideration of the impact of the sites on the local amenity and the environment. Specific analysis was</p> |

| Soundness Test and Key Requirements | Evidence Provided |
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| | <p>undertaken on landscape impacts and impacts on the historic environment.</p> <p>The development plan should be read as a whole and LPP1 and LPP2 contain policies to protect the local amenity and environment. Policy CP5 of LPP1 provides criteria for assessing traveller applications including requirements for additional landscaping. Policy TR6 in the Traveller DPD sets out further criteria, in particular on environmental impact, such as boundary treatments and landscaping, impacts on the Solent SPA, heritage assets and biodiversity. TR6 also includes detailed requirements in relation to drainage, waste storage, commercial activities and external lighting.</p> |
| <p>11 Set criteria to guide land supply allocations where there is identified need</p> | <p>The criteria of policies CP5 and TR6 will be used to provide a basis for decision making if applications come forward outside of the site identification process where there remains an unmet identified need.</p> <p>Further development on existing sites is allowed for under Policy TR5, where the circumstances justify it.</p> |
| <p>12 Policy in relation to large-scale unauthorised site in areas of strict and special planning constraints</p> | <p>N/A</p> |
| <p>13 Ensure that traveller sites are sustainable economically, socially and environmentally.</p> | <p>The criteria of LPP1 Policy CP5 seek to ensure that traveller sites are sustainable economically, socially and environmentally, by reason of their location in relation to nearby settlements and facilities, other Gypsy and Traveller provision, scale and design. CP5 also sets criteria for adequate standards of provision e.g. children’s play, vehicle space, drainage, etc</p> <p>The SA considered the sustainability of possible sites for the Traveller DPD in terms of all aspects of sustainability; economic, social and environmental. These aspects were therefore taken into account when considering</p> |

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| | <p>appropriate sites, having regard also to sites being available and deliverable, as discussed in the SA and as outlined in Cabinet (Local Plan) Committee Report CAB2947(LP)June 2017.</p> <p>Policies CP5 of LPP1 and TR6 of the Traveller DPD seek to ensure a balance is achieved between the needs of travellers, available sites, the needs of the settlement communities and environmental considerations.</p> <p>The criteria outlined in paragraph 13 a)-h) of the PPTS are therefore reflected in the planning policies of this DPD, together with those in LPP1 and LPP2 as far as possible within the remit of land use planning.</p> |
| Policy C: Sites in rural areas and the countryside (para 14) | |
| When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community. | Policy CP5 of LPP1 covers this consideration. |
| Policy D: Rural exception sites (para 15) | |
| If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites. | Although there is a lack of sites coming forward for travelling showpersons' needs, affordability of land has not been raised as an issue during the preparation of this plan. |
| Policy E: Traveller sites in Green Belt (paras 16-17) | N/A |
| Policy F: Mixed planning use traveller sites (paras 18-20) | |
| Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. | Policy CP5 and Policy TR6 reflect requirements to consider the commercial needs of travellers in site layouts, with pitches/plots having sufficient space for the storage and maintenance of equipment, whilst ensuring conflict between vehicles and pedestrians is minimised. The particular needs of travelling |

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| Local planning authorities should have regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment | showpeople for storage and maintenance of equipment are acknowledged. |
| Policy G: Major development projects (para 21) | |
| Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site. | N/A |