

# STEPHEN JUPP

BA(Hons), LLM, MRTPI

## CHARTERED TOWN PLANNER

Planning and Building Control Division  
Chichester District Council  
East Pallant House  
Chichester  
PO19 1TY

Thursday, 22 February 2024

Dear Sir/Madam:

**Re: Five Paddocks, Bracklesham Lane, Bracklesham**

**Continuation of use of land as single private travelling showpersons plot**

I write in connection with the above case and have the pleasure of enclosing my client's application for the above matter.

The land subject to this application is located a short distance to the north of the village of Bracklesham Bay on the west side of the B2198. Good visibility exists in both directions.

The existing lawful use of part of the land as a showperson's plot has been established under planning permission EWB/16/02434/FUL wherein the permitted mobile home is located in the north west corner of this site which was originally a single long, thin, parcel of land.

To the north are two existing lawful showpeople plots; to the west one plot and to the south three plots, all occupied by relatives of the applicants, all of whom are members of The Fairground Association of Great Britain.

The existing mobile home is occupied by John-Frank Morley the son of the original owner of this parcel of land, Stephen Morley. He is a member of 'The Fairground Association of Great Britain' [membership number ██████] and his latest membership card is attached at Appendix 1 which was issued on ██████

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## Planning Policy and Need

In December 2023, the DCLG published the latest version of the 'Planning Policy for Traveller Sites' (PPTS), albeit the only change from the August 2015 version was the change in the definition of a gypsy. This document provides up to date Government policy for Traveller Sites which includes Travelling Showpeople's sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life while respecting the interests of the settled community.

Paragraph 24 states that local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

- (a) the existing level of local provision and need for sites
- (b) the availability (or lack) of alternative accommodation for the applicant
- (c) other personal circumstances of the applicant
- (d) that the locally specific criteria used to guide the location of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites
- (e) that they should determine applications for sites from any travellers and not just those with local connections

Paragraph 25 requires LPAs to *"strictly limit new traveler site development in open countryside that is away from existing settlements"*

Paragraph 27 makes clear *"If a local planning authority cannot demonstrate an up-to-date five year supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission."*

Paragraph 28 states that *"the policy set out in paragraph 25 only applies to applications for temporary planning permission for traveller sites made 12 months after this policy comes into force."*

Amongst other identified aims in respect of traveller sites, Paragraph 4 of the PPTS document requires that local authorities should make their own assessment of need for the purpose of planning, and increase the number of traveller sites appropriate locations with planning permission.

It is clear that the principle of travelling showpeople sites in this location have been deemed to be acceptable by the LPA – illustrate by the various planning permissions that have been granted to establish what exists today.

## Chichester Need / Supply

LP Policy 36: Planning for Gypsies, Travellers and Travelling Showpeople sets out the need for pitches and plots for the period up to 2027. The evidence base for this policy is the Coastal West Sussex Authority Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (April 2013), which has now been superseded by two subsequent GTAAs. It is for this reason that it is out of date combined with the failure of the policy to address the need. This can be demonstrated by a comparison of tables. In the current local plan at Table 17.2 there is the following identified need:

**Table 17.2 Plot Provision required in the Plan Area to accommodate Travelling Showpeople**

2012-2017	2018-2022	2023-2027
11	3	4

This compares to Figure 11 in the December 2022 GTAA which has the following identified need, excluding those not falling within the definition:

**Figure 11 – Need for Travelling Showpeople households in the Chichester Local Plan area that met the Planning Definition by year periods**

Years	0-5	6-10	11-15	16-17	Total
	2022-26	2027-31	2032-36	2037-39	
	22	4	5	2	33

When one includes those not meeting the definition [ie included Lisa Smith cases] the overall figure for the plan period increases to 40 and for the years 2022-2026 to 24. This means there is an immediate need for 24 pitches.

Given the age of the policy and the inclusion of pitch/plot requirements which have been superseded by 2 subsequent GTAAs then clearly consideration needs to be given to how up-to-date the policy remains. Not surprisingly this issue has been considered in a number of appeals. It appears that it is fairly well established that the pitch/plot targets within the policy are out-of-date and that the latest evidence should form the basis for assessing the level of need.

### Need for Plots

A revised Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2022) has been produced as part of the evidence base for the emerging Local Plan 2021-2039. This has identified a requirement for a further 33 plots for travelling showpeople who meet the planning definition (as per PPTS) in the period 2022-2039, with an immediate requirement for 22 plots to be provided in the period 2022-2026. There is also an additional need for 7 further plots which the GTAA identifies as 'undetermined' need. Consequently, the emerging Plan assumes that the whole need ought to be consolidated and that all of this will need to be met through the provision of suitable plots, meaning the overall need level is in essence 40 plots up to 2039, with 24 being needed within the first 5 years.

## Meeting the level of need

The new Local Plan 2021-2039 Proposed Submission aims to address the identified needs through the allocation of plots on suitable strategic sites, intensification of existing sites and through permitting sites on a case-by-case basis. It is clear that the allocation of sites through suitable strategic sites will take some time to come forward, assuming that they are retained through the local plan examination.

It is therefore clear that the Council will continue to rely heavily on windfall sites coming forward in order to meet the identified need.

There is currently a relatively high level of need within the plan area, which is particularly acute in the short-term, and assuming that this ought to encompass the full level of need identified in order to avoid any potential discrimination then the 5-year need requirement is 24 plots. Currently no supply can be assumed, and while the new Local Plan will provide some plots, due to a lack of sufficient appropriate available sites there will remain an outstanding need, at least in the short-term. Consequently, there will be a significant reliance on windfall sites coming forward in order to meet the identified needs.

## Personal circumstances

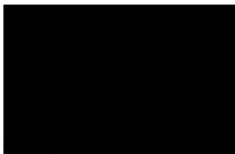
The applicant has lived on site in a tourer for 4 years with his father living in the large caravan. His father is moving away but he is not going with him. He is now 18 and he works at fairs helping his uncle, Jeff Morley who lives on the site to the north. Jeff Morley has confirmed this in the email attached to this statement.

## Conclusions

I trust that, in the light of the submissions that I have made the case officer will be able to recommend that planning permission be granted for this additional plot, on land which is surrounded by other showperson plots.

However, can I ask that if there are any queries concerning the application that the case officer, prior to any formal recommendation being formulated, contacts me?

Yours sincerely,



**STEPHEN JUPP**  
BA(Hons), LL.M, MRTPI  
Chartered Town Planner

Email form Jeff Morley  
confirming that applicant  
works with him at fairs

From: Jeff Morley [REDACTED]

Subject: Showmans status

Date: 20 February 2024 at 15:35:33 GMT

To: stephen jupp <steve@planning-solutions.co.uk>

Dear Steve

This email is to confirm that my nephew John Morley works for me on my funfair equipment at different fairgrounds and is covered on my insurance.

Hope this information clarifies the situation.

Kind Regards

Jeff

Morley Funfairs

Paddock Barn

Bracklesham lane

Chichester

West-Sussex