

Planning Policy

Proof of Evidence

Town and Country Planning Act 1990
Section 78 appeal against the refusal of planning permission

Witness: Miss Cheryl Willett BSc MSc MRTPI

Subject of Evidence: Gypsy and Traveller Need and Supply

Appeal: APP/W0340/W/24/3356688 (LPA reference
23/00815/FUL)

Site: Land south of Sandhill, Hermitage, Thatcham

Proposal: Change of use of land for the formation of 5
Gypsy/Traveller pitches comprising of 1 mobile home, 1
touring caravan, and 1 utility building per pitch

Date: April 2025

Council Reference: 23/00815/FUL

Proof of Evidence

Name: Cheryl Willett. Planning Policy.

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1. Summary

- 1.1 In West Berkshire, the GTAA 2021 identifies that, after taking into account the existing supply of sites, there is a residual need of 30 pitches between 2021 and 2038. Breaking this down, in the short term, up to 2026, the need is 13 pitches, and the longer term need between 2026 and 2038 is 17 pitches. This need is based on meeting all of the needs of the Gypsy and Traveller community, which now conforms with the amended definition of Gypsies and Travellers as defined by the 2024 Planning Policy for Traveller Sites (PPTS).
- 1.2 In meeting this need, 13 pitches have planning permission. These comprise 8 pitches at Paices Hill, an allocated site; 1 pitch at Ermin Street, Lambourn; 2 pitches at Wash Water; 1 pitch at Newtown Road, Newbury; and 1 additional pitch at Four Houses Corner, Padworth, counted over and above the 16 pitches in the existing supply. Thus, this supply leaves a residual need of 17 pitches over the period to 2038. There is no shortfall in the 5 years up to 2026.
- 1.3 No new allocated sites are proposed in the Local Plan Review, which is currently at examination. A new GTAA will be required to reassess need, and will likely be undertaken following the repopulation of Four Houses Corner. A positively worded development management policy is proposed in the Local Plan Review to manage sites coming forward across the District.

2. Introduction

Qualifications and Experience

- 2.1 My name is Cheryl Willett. I am a Senior Planning Officer in the Planning Policy team at West Berkshire Council. I started at West Berkshire Council in 2009 initially in Development Management and moved to Planning Policy in 2018. I have a Bachelor of Science undergraduate degree in City and Regional Planning and Masters in Sustainability, Planning and Environmental Policy, both from University of Wales, Cardiff. I am a Member of the Royal Town Planning Institute.
- 2.2 As part of my role in the Planning Policy team I oversee the assessment of needs and supply of pitches/plots and sites for Gypsies, Travellers and Travelling Showpeople. Arc4 were instructed to undertake a Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) and I oversaw the procurement, instruction, and management of that assessment in 2019 and the update in 2021. I was the lead policy officer, working alongside Arc4, in responding to the Local Plan Inspector's questions as part of the examination, including the hearing sessions.
- 2.3 I have been involved in providing policy advice on planning applications and appeals. I was originally the case officer for the appeal proposal, though I was not able to continue with the application due to work for the Local Plan examination. I consider I have a good understanding of the planning issues involved in cases for Gypsies and Travellers.
- 2.4 I confirm that the evidence which I have prepared and provided for this appeal is true to the best of my knowledge and belief and it has been prepared and is given in accordance with the guidance of the RTPI, my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Purpose and Scope of Evidence

- 2.5 This proof of evidence has been prepared in response of the need and supply of Gypsy and Traveller pitches in West Berkshire District, and of alternative sites.
- 2.6 An updated Statement of Common Ground (SoCG) which includes the topic of need and supply and alternatives has been prepared. At the time of the writing of the Proof, although there had been significant progress, a final copy of the SoCG had not been signed. Therefore, the information on authorised sites within the District, including maps, supply, and alternative sites have been included in this Proof of Evidence.

3. Need and Supply

NPPF 2024 and PPTS 2024

- 3.1 On 12 December 2024 the Government published the updated Planning Policy for Traveller Sites (PPTS) (CD 8.2) together with the updated NPPF (CD 8.1). The PPTS at paragraph 28 now applies the “tilted balance” in NPPF 11(d) where the Council cannot demonstrate an up-to-date 5 year supply of deliverable sites.
- 3.2 The PPTS 2024 further updates the definition of ‘Gypsy and Traveller’ from the PPTS 2023, which was amended following the judgment of the Court of Appeal in *Lisa Smith v Secretary of State for Levelling Up, Communities and Housing* [2022] EWCA Civ 1391 (“the Lisa Smith case”). The current definition is as follows:

For the purposes of this planning policy “gypsies and travellers” means:

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, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Pitch Supply

3.3 List of existing authorised sites (see Maps in Appendix 1)

A list of authorised and tolerated Gypsy and Traveller sites have been included in the topic based Statement of Common Ground. There is therefore no need to repeat this list in this Proof.

The following sites represent the current authorised sites at present and should be cross referenced using the maps contained in Appendix 1. The list makes it

clear which sites were surveyed as part of the 2021 GTAA and sites which were delivered following the 2021 GTAA study:

- Four Houses Corner, Padworth: 16 pitches (as surveyed in 2021 GTAA) (1 on map)
- Old Stocks Farm, Paices Hill, Aldermaston: 21 pitches (as surveyed in 2021 GTAA) (2 and 3 on map)
- New Stocks Farm, Paices Hill, Aldermaston: currently 3 pitches (+16 transit pitches) (as surveyed in 2021 GTAA) (2 and 3 on map)
- Land at Mayfair, A4, Beenham: 1 pitch (as surveyed in 2021 GTAA) (4 on map)
- Land to the west of Hillview, A4, Woolhampton, known as Oaklands View: 2 pitches (as surveyed in 2021 GTAA) (5 on map)
- Land at Ermin Street, Lambourn Woodlands: 1 pitch (delivered post 2021 GTAA) (6 on map)
- Land west of pumping station, Enborne Row, Wash Water: 2 pitches (delivered post 2021 GTAA) (7 on map)
- Land south of Abbottswood, Newtown Road, Newbury: 1 pitch (delivered post 2021 GTAA) (8 on map).

- 3.4 There is a tolerated site at Stable View Oare (see 10 on map), containing 1 pitch. This pitch has already been accounted for in the GTAA 2021 (CD 8.13), when counting existing sites, and does not impact on the need and supply.

Gypsy and Traveller Accommodation Residual Need

- 3.5 Table 1, below, illustrates the additional permanent pitches required between 2021 and 2038, aligning with the 15 year timescale of the GTAA 2021. The requirement reflects the change in definition of Gypsy and Traveller, as set out in Annex 1 of the PPTS. The residual need considers existing supply. The table includes five sites which are planned, and have received planning permission, since the GTAA was updated in 2021.

Table 1 Gypsy & Traveller Accommodation Residual Need

Additional permanent pitches required 1 April 2021 to 31 March 2038	30
Additional permanent pitches with planning permission (situation at present) 1 April 2021 to 1 April 2025	
• New Stocks Farm, Paices Hill, Aldermaston	8
• Four Houses Corner, Padworth	1
• Ermin Street, Lambourn Woodlands	1
• Land west of pumping station, Enborne Row	2
• Land south of Abbottswood, Newtown Road, Newbury	1
Total pitches	13
Permanent pitches required 2 April 2025 to 31 March 2038	17

3.6 As part of the 2021 update (CD 8.13) of the 2019 GTAA (CD 8.12) the consultants Arc4 undertook 16 household interviews, with 1 household survey from the 2019 household survey being reanalysed, and reviewing data from 3 households based on planning application data.

3.7 As far as the appeal site is concerned it was not included in the 2021 GTAA. The GTAA modelling of short-term need (CD 8.13) includes an allowance at row 3g for 9.7 households moving into West Berkshire based on past trends in migration. The short term residential pitch needs have been considered on the basis of evidence.

GTAA 2021

3.8 The table (Table 6.4) below is from page 36 of the 2021 GTAA (CD 8.13). This assessed all need ('cultural') and then applied a PPTS definition filter. Given the date this pre-dated both the Lisa Smith case and the change in definition of Gypsies and Travellers as part of Appendix 1 of the PPTS 2024 (CD8.2).

- 3.9 The table counts the Paices Hill allocation in (B) as 8 pitches counting towards meeting the pitch shortfall. The Inspector for the recent Blacknest appeal (CD8.33) agreed that the planned pitches at Paices Hill could form part of the supply, despite the Blacknest appellant's contention that it could not (paragraph 89, CD8.33). Following the Blacknest appeal, Arc4, the consultant for the GTAA, has confirmed they had demographic information for 6 households either living at or planning to live at Paices Hill (New Stocks Farm) at the time of the 2021 GTAA survey. They were also aware of two more households planning to move onto the site. This therefore rebuts the Blacknest appellant's argument that the GTAA undercounted the family formation at Paices Hill.
- 3.10 Four Houses Corner (FHC) was counted in the supply as having 16 pitches as that reflected the number of available pitches on site at the time of the survey. However, it was recognised that the residents could not be interviewed as they had been decanted. The GTAA recommends that once the site is repopulated an assessment of need and supply will need to be conducted to produce a new GTAA.
- 3.11 Overall, and in recognition of this need to establish newly arising need when FHC is repopulated the need is expressed as a minimum number. As the Inspector for the Blacknest appeal states at paragraph 86 (CD 8.33) "*an assessment of need is not an exact science, and the Council recognises that it is a minimum, not a maximum*".
- 3.12 The Council considers the GTAA 2021 to be robust, up to date and proportionate, as agreed by the Inspector for the Blacknest appeal in paragraph 91.

Table 6.4 Addressing Gypsy and Traveller pitch need:		
West Berkshire	Cultural need	Of which PPTS NEED
5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)	13	9
Additional residential pitches (B)	8	8
Residual need 2021/22 to 2025/26 with additional residential pitches included in supply (C) = A-B	5	1
Longer-term need 2026/27 to 2037/38 (D)	17	11
Residual need 2021/22 to 2037/38 with additional residential pitches included in supply (E) = C+D	22	12
Summary	Cultural need	Of which: PPTS NEED
Plan period Authorised Pitch Shortfall (2021/22 to 2037/38) (F)	30	20
Additional residential pitches (G)	8	8
Residual need 2021/22 to 2037/38 after potential pitch development considered (F-G)	22	12

Pitch Supply since the 2021 GTAA

- 3.13 Four Houses Corner in Padworth is a Council-run site (privately owned). The site is currently being refurbished having been closed for a number of years. The site layout will be changed to improve the design and living conditions on site. Residents have been decanted, with the majority in Bricks and Mortar. The Local Planning Authority are unable to have details of exact residence due to GDPR. An additional pitch would be provided, over and above the 16 pitches counted in the 2019 and 2021 GTAAs, which has been enabled due to the redesign and in response to the shortfall of pitches. Planning permission was granted at planning committee, with a decision issued on 3rd April 2024 (23/01552/REG3) (CD8.40-8.42).
- 3.14 The site is not operational at this time, though work is underway to enable the opening of the site in the Spring/Summer of 2025. There is likely to be a phased repopulation, which follows advice from Thames Valley Police. It is understood that there are 12 households who have a legal right to return. In addition, there are currently 12 households registered on the waiting list. The Inquiry can be updated verbally on the progress of reopening the site.

- 3.15 An additional pitch at Ermin Street, Lambourn obtained retrospective permission at appeal (CD 8.31). Although this restricted to personal occupancy it still provides a pitch to meet a need, and therefore it is correct to include this pitch.
- 3.16 The allocated site at Paices Hill, Aldermaston has obtained planning permission for the change from 8 transit pitches to 8 permanent sites in September 2023 (22/00120/FUL CD8.44-8.45).
- 3.17 Two additional pitches on land west of pumping station, Enborne Row, Wash Water, retrospectively obtained planning permission with Planning Committee approval in June 2024 (22/01899/FUL) (Committee report and update CD 8.34-8.35 and decision notice 8.36).
- 3.18 One additional pitch on land south of Abbottswood, Newtown Road, Newbury, retrospectively obtained planning permission with Planning Committee approval in February 2025 (23/01045/FUL) (committee report and update CD 8.37-8.38 and decision notice CD 8.39).
- 3.19 For context, at the time of writing, planning permission has been refused for a total of 24 pitches since the 2021 GTAA, including the appeal site:
- 1 pitch on land at Mount Pleasant Farm, Enborne Row (though a further planning application has been submitted and currently under consideration);
 - 2 pitches on land to the west of the authorised Gypsy and Traveller site at Hillplace, Woolhampton;
 - 4 pitches at the existing authorised Gypsy and Traveller site at Mayfair, Beenham;
 - 7 pitches on land at Lawrences Lane, Thatcham (refused and then dismissed at appeal – CD8.32). The site has been returned to its original condition and residents have moved elsewhere;
 - 2 pitches on land north of the M4 at Hermitage;

- 2 pitches on land east of Blacknest Lane, Brimpton.
- 1 pitch on land east of Blacknest Lane, Brimpton was recently refused permission at appeal, and the residents have until March 2026 to vacate the site (CD 8.33 and 9 on map in Appendix 1). The Enborne Row, Woolhampton, Beenham, and other Hermitage sites were refused by the Council for technical reasons. The site at Hillplace, Woolhampton continues to be unauthorised. There are also caravans on Mayfair, Beenham that are unauthorised, though it is not known exactly how many are on site and whether they are occupied by those who meet the PPTS definition of Gypsy and Traveller.

5 year supply (2021-2026)

3.20 Of the 30 pitches needed to 2038, 13 are required in the short term up to 31 March 2026. 13 pitches have been planned for (allocated sites/and/or have planning permission). Thus, there is no shortfall in the short term up to 2026, and the Council can demonstrate a 5 year supply of pitches. This is confirmed by the Inspector for the recent Blacknest, Brimpton appeal (CD 8.33) where the decision was made following the updates to the NPPF and the PPTS, as well as in the appeal decisions for Lawrence's Lane, Thatcham (CD8.32) and Ermin Street, Lambourn (CD8.31). However, the Council acknowledge, and this is also set out in the Blacknest, Brimpton appeal, that the assessed need represents a minimum need. To quote the Inspector, at paragraph 91: *"There is no assessed shortfall, though that is a minimum and there is still an assessed need to provide for in the future, and the actual need is likely to be higher than the 2021 Update, and a requirement to cater for whatever the need is"*.

Longer term supply (2026-2038)

3.21 17 permanent pitches are required between 1 April 2026 and 31 March 2038. No new sites are identified in the Local Plan Review. It was originally planned to meet the need through a Gypsy and Traveller Accommodation Development Plan Document (GTA DPD). A 'call for sites' was conducted as a first stage, though only resulted in the submission of one pitch. It is likely that the Council will need to progress a new Local Plan following the adoption of the Local Plan

Review, should the Inspector recommend it is a sound Plan, and the timetable for both documents may be similar. Thus, this Local Plan would look to include sites for Gypsies and Travellers rather than a GTA DPD.

- 3.22 Site allocations will be made in the context of a further update to the GTAA which would likely follow the repopulation of Four Houses Corner, Padworth.

Effect of PPTS 2024 and NPPF 2024

- 3.23 The 2021 GTAA has already accounted for all need (cultural need), and therefore in applying the definition in the 2024 PPTS the Council have considered all need and can plan accordingly. This includes 'all other persons with a cultural tradition of nomadism or of living in a caravan', as the GTAA would include those who culturally associate as a Gypsy and Traveller. There is no undercounting of need as put forward in the Appellant's Statement of Case (paragraph 5.29) based on the updated definition in the PPTS.

- 3.24 There is no assessed shortfall in the 5 years up to 2026, and a further 17 pitches are needed between 2026 and 2038. This is based on the assessment of all need for Gypsies and Travellers in West Berkshire.

- 3.25 The PPTS 2024 or NPPF 2024 does not affect the method of assessment of housing needs for Traveller Sites for the West Berkshire GTAA, as the GTAA already examines all need and those with a 'cultural tradition of nomadism or of living in a caravan'. Paragraph 63 and footnote 27 of the NPPF still refer to the PPTS and assessment of those covered under the definition of Annex 1.

Local Plan Review and Examination

- 3.26 The West Berkshire Local Plan Review (LPR) was submitted on 31st March 2023 and the hearing sessions were held during May, June and October 2024. Consultation on the Main Modifications took place between 6th December 2024 and ending on 31st January 2025 (schedule at CD 8.26). At the time of writing this Proof the Inspector's final report had not been published. All parties will be notified when the report is published.

- 3.27 As part of the examination the Inspector sought confirmation that the evidence underpinning the identified need was robust, proportionate and up-to-date. The Inspector sought clarification on how the existing and allocated sites in the District contributed to addressing the identified shortfall, and how the the residual need would be met, and the justification if the Plan did not meet the identified need (PQs 34 and 35 in CD8.27).
- 3.28 During the hearing session the Inspector did not query the methodology for the GTAA or the figures of need and supply, other than seeking assurances that the evidence was robust, proportionate and up to date, as outlined above. The Inspector directed the Council to remove references to the 'PPTS' when setting out need in figures (which references the 2015 PPTS), and a Main Modification is proposed, as detailed below.
- 3.29 Main Modifications are proposed to the supporting text of emerging Policy DM20. MM88 (as outlined in the Schedule of Main Modifications, pages 119-123 CD8.26) proposes to remove table 7 in the supporting text and replace with a table which outlines all need, which is 30 pitches up to 2038, and include planned supply to produce a residual figure which requires meeting. The references to short term and long-term need are removed from the table and instead is explained in the supporting text (MM88 in CD8.26). The supply of sites is set out.

Alleged past failure of policy

- 3.30 The Council does not accept there has been a historic failure of policy in providing sites. As outlined in the Lawrence's Lane appeal and decision (CD 8.32), evidence was presented to highlight that need was not historically identified in West Berkshire. Need was previously calculated at a County level when Berkshire County Council existed, then moving to the Regional Spatial Strategy, before West Berkshire became a Unitary Authority. No additional sites were required at that time.
- 3.31 Sites were not required as part of the West Berkshire Core Strategy, which was adopted in 2012, as this would be for the Site Allocations DPD to cover. The

Inspector for the Core Strategy found this a sound approach. Following the Core Strategy adoption and the completion of a GTAA in 2015 a site was allocated at Paices Hill, Aldermaston (as discussed above, this relates to the conversion of 8 transit pitches to 8 permanent pitches at New Stocks Farm, Paices Hill, Aldermaston). Planning permission has been subsequently approved, in 2022 (CD8.45), though not yet lawfully implemented. Planning conditions are in the process of being discharged. The allocation of the site is therefore proposed to be carried forward in the Local Plan Review.

3.32 The Inspector in the Lawrence's Lane, Thatcham appeal (CD8.32) stated at paragraph 104 *"from the evidence before me I cannot go as far as to say that '...there has been a persistent and woeful failure by the Council..."* as identified in the Ermin Street appeal decision, in relation to policy failure. The Inspector in the more recent Blacknest Lane, Brimpton appeal (CD 8.33) agreed with the Lawrence's Lane Inspector's conclusion on policy failure (paragraph 91).

Meeting future need

3.33 No new allocations are proposed in the Local Plan Review, currently under examination. The site at New Stocks Farm, Paices Hill, Aldermaston is proposed to be carried forward from the Housing Site Allocations Development Plan Document. Planning permission for the permanent pitches was approved on 30th September 2022 (CD44-CD45). This is an existing Gypsy and Traveller site, and the pitches to be converted are transit pitches. The change of use to permanent pitches contributes to the supply of sites as it meets the permanent need, and would count as supply in the short term, up to 2026. The Inspector for the Blacknest, Brimpton appeal (CD8.33) considered, at paragraph 89, that the new pitches at Paices Hill would form part of the supply.

3.34 Despite a number of consultation events, through the Local Plan Review (Regulation 18 and 19 stages), and various call for sites exercises, only one pitch on one site was submitted. Discussions were held with the site promoters for the proposed strategic site at North East Thatcham, though there was no agreement to include pitches in the allocation. The expansion of Paices Hill,

Aldermaston is not possible due to the site's location in the Detailed Emergency Planning Zone of Aldermaston Atomic Weapons Establishment, and the risks associated with additional development in such locations. Existing development is accounted for in the Off-Site Emergency Plan, though any increase in population would likely meet with an objection from the Office of Nuclear Regulation. The increase in pitches at Four Houses Corner has been possible as the site is Council operated. Given the design, it is unlikely that the site could include more pitches.

- 3.35 Policy officers have liaised with planning agents working in West Berkshire, and some members of the travelling community. Only one site was submitted, for one pitch, on land where planning permission has previously been refused for a Gypsy and Traveller pitch. The call for sites is an open process and sites can be submitted at any time for consideration.
- 3.36 Going forward, as work will need to commence on a new Local Plan, owing to the NPPF 2024, the Council will look to allocate sites. This will be in the context of updated evidence in a new GTAA. The Council had originally proposed to undertake a Gypsy and Traveller Accommodation Development Plan Document (GTA DPD), though as explained above, a new Local Plan will be prepared. The recently updated Local Development Scheme (LDS) March 2025 (CD8.29) has removed the GTA DPD from the timetable moving forward.
- 3.37 The LPR currently under examination (CD8.9) contains a criteria-based policy, proposed Policy DM20. This would replace and update Policy CS7 in the Core Strategy and Policy TS3 in the Housing Site Allocations Development Plan Document. This policy safeguards existing sites to retain supply, permits expansions of existing authorised sites, permits sites in or well related to existing settlements, and seeks to ensure sites in rural settings do not dominate the nearest settled community. Sites are preferred on previously developed land where possible. This is all subject to meeting the criteria outlined in the policy.

Sub regional need

- 3.38 As part of the Duty to Cooperate duty the Council engaged with surrounding local authorities concerning strategic matters, where meeting the needs of Gypsies and Travellers was discussed (Duty to Cooperate Statement CD 8.30). Each authority has their own needs assessment, and would look to meet their own need.

Alternative sites

- 3.39 There are limited sites within the District, and registers are not kept to detail availability for each pitch on each site. The Four Houses Corner (FHC) site in Padworth, which is the only Council run site, is not operational at this time, though work is well underway to enable the opening of the site in the Spring/Summer of 2025 having been closed since 2019/2020, with demolition completed in 2022. The residents are housed in temporary accommodation. FHC will open with 17 pitches, of which 1 is additional supply when counted against the GTAA 2021 requirement.
- 3.40 The site is not operational at this time, though as stated above, work is underway to enable the opening of the site in the Spring/Summer of 2025. There is likely to be a phased repopulation, which follows advice from Thames Valley Police. It is understood that there are 12 households who have a legal right to return. There is no indication at present as to how many will return. At the time of writing this Proof there were 12 households on the waiting list for the remainder of the pitches (CD8.43). It is therefore unlikely that FHC would be capable of being a reliable alternative site for all of the residents currently on or waiting to come on to the appeal site.
- 3.41 There are also transit pitches on New Stocks Farm, Paices Hill in Aldermaston, though these have a limit of three month stays. 8 of the 16 transit pitches are an allocated site and have planning permission for the change of use to 8 permanent pitches, and 8 are retained as transit pitches. The Appellant has not considered the availability of the New Stocks Farm as an alternative within the District,

though it is recognised that a stay would only be on a temporary period and may not be available for all of the residents of Sandhill.

- 3.42 No details have been submitted by the appellant to demonstrate that sites outside the of the District are available, or indeed whether any other land within the District was investigated. The Council is aware of a site in Headley, south of Newbury, in the adjacent Borough of Basingstoke and Deane (CD8.46). The site, although not in close proximity to the appeal site, has planning permission for 4 pitches and the applicant is the appellant of this current appeal. Therefore, the site is in the appellant's control to offer as an alternative, though it would not be available for all residents of the appeal site. There is a later application for market housing on the same site. Neither permission has been implemented. The Inspector for the Blacknest appeal (CD8.33), at paragraphs 95, 96 and 97, considered the site to be a reasonable alternative, albeit in the context that the appellant for Blacknest was listed as a potential occupant of one of the pitches at Headley.

4. Conclusion

- 4.1 There is an assessed residual need for 30 pitches between 2021 and 2038, as outlined in the GTAA 2021 Update. 13 pitches are needed between 2021 and 2026 and 17 pitches are required between 2026 and 2038. 13 pitches have permission, and therefore there is no short term need up to 2026. The Council can demonstrate a 5 year supply of pitches. This leaves an assessed need of 17 pitches. The Council accepts that the assessed need is a minimum need. A new GTAA will be undertaken following the repopulation of Four Houses Corner. The Council aims to meet its need, going forward, through a new Local Plan, and by way of assessing planning applications through a criteria-based policy in the Local Plan Review.

5. Appendix 1 Maps of Gypsy and Traveller sites (authorised and tolerated)