



## **Town & Country Planning Act 1990**

**(as Amended)**

## **The Town & Country Planning (Inquiries Procedure)**

**(England) Rules 2000 (SI 2000/1624)**

### **Appeals by:**

**(A) Mr Barney Doherty against the non-determination of planning permission by Waverley Borough Council for: Change of use of land to provide 1 gypsy pitch comprising 1 mobile home and 1 touring caravan; erection of 1 day room with associated parking hardstanding at Pitch 1, Land West of Lydia Park, Stovolds Hill, Cranleigh.**

***Planning Inspectorate Reference: APP/R3650/W/25/3367393***

***LPA Reference: WA/2025/00495***

**(B) Mr Levi Williams against the non-determination of planning permission by Waverley Borough Council for: Change of use of land for stationing of 2 mobile homes and 1 touring caravan with associated parking hardstanding (retrospective) at Land West of Lydia Park, Stovolds Hill, Cranleigh.**

***Planning Inspectorate Reference: APP/R3650/W/25/3366387***

***LPA Reference: WA/2025/00578***

### **Proof of:**

**Steve Jarman  
Head of Traveller Assessments  
Opinion Research Services Ltd.**

**February 2026**

## Background

1. My name is Steve Jarman and I am Head of Traveller Assessments for Opinion Research Services Ltd. (ORS) where I have worked since May 2013. Previous to that I had over eighteen years' experience in Local Government at both a senior and managerial level. This covered all aspects of consultation, engagement, research and information, and policy development, across the full range of local government and other public-sector services.
2. Formerly as manager of Cardiff Council's own in-house research consultancy I had responsibility for developing and implementing a wide range of research, consultation and community engagement initiatives. I have extensive experience of project managing large-scale strategic and sensitive consultation exercises; the implementation of qualitative and quantitative research methods; evidence-based policy development; and data analysis and interpretation.
3. Also, as a qualified Planner, I have a sound knowledge of the policy and legislative frameworks that relate to local government and the wider public sector, as well as in-depth knowledge of policy, legislation and case law relating to the Travelling Community.
4. I have a BSc in City and Regional Planning from Cardiff University (1994); a Post Graduate Diploma in Town Planning from Cardiff University (1996); and a Post Graduate Certificate in Sustainable Leadership from the University of Wales Institute Cardiff (2010).
5. I lead on the Gypsy and Traveller Accommodation Assessment Portfolio for ORS and have been responsible for GTAA's covering over 170 local authorities in England and Wales. Since starting at ORS I have been responsible for GTAA studies for a large number of local authorities across the UK including the majority (7) local authorities in Surrey (including Waverley), Central Bedfordshire, Bedford, Milton Keynes, Luton, the majority (9) local authorities in Hertfordshire, Kent (4 local authorities), Buckinghamshire, Cambridgeshire Region (7 local authorities), Cheshire (4 local authorities), Cornwall, Devon (4 local authorities), Dorset (2 unitary authorities), Cumbria (5 local authorities), Essex Region (14 local authorities), Gloucestershire (6 local authorities), the majority (9) local authorities in Hampshire, Leicestershire (8 local authorities), 20 London Boroughs, Northamptonshire (7 local authorities), Oxfordshire (5 local authorities), Somerset, South West England (4 local authorities), West Sussex (6 local authorities), Wales (14 local authorities), and Wiltshire - making ORS the largest provider of such studies in the country
6. I am instructed by Waverley Borough Council to support the Council's case in this appeal. My evidence deals specifically with the accommodation needs for Gypsies, Travellers and Travelling Showpeople, and the Waverley Borough Council Gypsy and Traveller Accommodation Assessment (GTAA) that was completed by ORS in December 2025 and published by the Council in January 2026 (**Appendix 1**). The GTAA also included a detailed Pitch Deliverability Assessment (PDA) to assess the capacity of existing sites and yards to meet some or all of the need identified in the GTAA. The outcomes of the PDA have informed the review of current 5-year land supply.

## Introduction

7. These appeals are by Mr Barney Doherty (Appeal A), and Mr Levi Williams (Appeal B) against the non-determination of planning permission by Waverley Borough Council on Land to the West of Lydia Park, Stovolds Hill, Cranleigh.

## Key Issues Relating to the GTAA

8. The Statement of Case prepared by Dr Murdoch (undated) in relation to Appeal A sets out a number of issues relating to need and supply – however these all relate to the previous GTAA that was published in 2018.
9. The Draft Statement of Common Ground by Mr Rowe (undated) in relation to Appeal B also sets out a number of issues relating to need and supply – however these also relate to the previous GTAA that was published in 2018.
10. However, both include as matters of potential disagreement:
  - » Whether or not there is an unmet need within the Borough.
  - » Whether the Borough can demonstrate an up-to-date 5 year supply of sites.
11. In response to the issues that have been raised by the Appellants I have been asked by the Council to provide an overview of the new Waverley GTAA.
12. The new GTAA provides a credible evidence base which can be used by the Council to aid the preparation and implementation of Local Plan Policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2025/26 to 2044/45.
13. The GTAA was completed following a robust methodology based on industry standards as set out in a range of current Legislation and Government Guidance. Primarily the new GTAA supported the requirements of the Planning Policy for Traveller Sites (PPTS) 2024, and the requirements of the National Planning Policy Framework (NPPF) 2024.
14. The ORS GTAA methodology has been repeatedly found to be sound and robust, including through Local Plan Examinations in Bedford, Brentwood, Blaby, Bristol, Cambridge, Castle Point, Central Bedfordshire, Charnwood, Chelmsford, Cheltenham, Colchester, Cotswold, Daventry, East Hertfordshire, Elmbridge, Gloucester, Kings Lynn, Leicester, Hart, Maldon, Milton Keynes, Newham, Newark and Sherwood, Runnymede, South Cambridgeshire, South Northamptonshire, South Staffordshire, Tendring, Tewkesbury, and Waverley (for the 2018 GTAA).
15. The 2025 Waverley GTAA Report contains detailed background and methodology chapters that set out the approach that was undertaken to complete the GTAA.
16. My Proof will seek to address the need and supply issues, together with evidence setting out scrutiny of the overall ORS GTAA methodology. I will also seek to address the key elements of the overall methodology that was used to prepare the GTAA for Waverley to demonstrate that it was a robust assessment in line with current Government policy and guidance at the time, and that the Council can demonstrate a current 5-year supply.
17. In conclusion, the 2025 GTAA outcomes provide a robust and up-to-date basis to assess 5-year supply as the locally set target. On this issue it should be given determinative weight.

## Scrutiny of the ORS GTAA Methodology

18. An Appeal Decision for a Hearing in Central Bedfordshire (APP/P0240/C/18/3213822) that was issued in March 2020 concluded (**Appendix 2**):

*27. ...whilst there have been some queries in previous appeal decisions over the conclusions of other GTAA's produced by ORS, the methodology, which takes into account the revisions made in 2015 to the Government's Planning Policy for Traveller Sites (PPTS), has nevertheless been accepted by Inspectors in a considerable number of Local Plan Examinations.*

19. In addition, specific elements of the ORS GTAA methodology have been supported by Planning Inspectors in various Decision Notices.

20. The Planning Inspector for an appeal in Chelmsford (APP/W1525/A/14/2226970) that was issued in February 2016 agreed with the approach taken by ORS when identifying concealed or doubled-up households. The Inspector concluded (**Appendix 3**):

*25. The appellant disputes the Council's approach, particularly with regard to its assessment of need. He considers that there are errors in the GTAA with regard to concealed households, doubling up, hidden need, household formation rates and unauthorised sites. He contends that these errors combine to result in need being considerably underestimated. More realistic figures would, in his view, be 33 pitches to 2018, a further 18 from 2018 to 2023 and another 44 from 2023 to 2033. Mr Jarman, of Opinion Research Services (ORS), explains that the methodology used by ORS takes into account relevant legislation and guidance and has been evolved over a lengthy period of preparing GTAA for over 100 authorities. It includes interviews with gypsy and traveller families and gathering of evidence from other sources including through advertisements and dialogue with a wide range of stakeholders.*

*26. The terms "doubling-up" and "concealed households" both refer to actual or potential households which are currently living on other gypsy and traveller sites. The GTAA does not count a household as needing another pitch if it is found during interviewing that there is not a wish for another pitch. I find this approach to be reasonable and consistent with that of engagement with the traveller community in assessing need.*

21. The approach taken by ORS to new household formation and the use of a base rate of 1.50% has been supported by Planning Inspectors in a number of Decision Notices. In relation to a Decision Notice for an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used. The Inspector concluded (**Appendix 4**):

*23. In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.50% but that a 2.5% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population*

*age profile and the national picture, a 1.50% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.50% figure is justified in the case of Doncaster.*

22. Another case (APP/P1615/W/16/3148326 – **Appendix 5**) issued in August 2017 in the Forest of Dean the Inspector concluded at paragraphs 41 and 42 that:

*41. The parties also differ in terms of household growth rates. The GTAA was undertaken by Opinion Research Services (ORS), part of Swansea University. ORS's research indicates that the average annual household growth rate is in the order of 1.50%. The GTAA adjusts this figure according to local demographics, such that within Cotswold District the rate is 1.90%, whilst in the Forest of Dean it is 1.40%. ORS prepared a technical note in 2015 to justify this rate. This note has been subject to peer review and was published in Social Research Practice in 2016/17.*

*42. The appellant's position in respect of household growth rates has changed during the course of the appeal from an initial figure of 3.00% to 1.90% in the most recent submission. Many of the elements that the appellant considers contribute to the higher household formation rate have been taken into account in the ORS research. There remains a difference between the parties as to the life expectancy of gypsies and travellers. The appellant submits that life expectancy at birth is 89 years, whilst ORS believe 72 years to be a more realistic figure. ORS rely on research from the University of Sheffield which found that life expectancy amongst gypsies and travellers was about 10-12 years less than for average. ORS found that using a life expectancy of 72 the results were consistent with the 2011 census. I therefore prefer the evidence of ORS which has been subject to greater scrutiny.*

23. Another relevant decision was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded (**Appendix 6**):

*29. There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.*

24. As such, I would contend that the ORS GTAA methodology has repeatedly been found to be robust and in line with national policy and guidance and has been supported by Inspectors at numerous Local Plan Examinations and Planning Appeals.

## **PPTS Planning Definition of a Gypsy, Traveller and Travelling Showperson**

25. The most recent version of PPTS that was published in December 2024 contains a revised definition of a Gypsy, Traveller and Travelling Showperson for planning purposes. This can be found in Annex 1 of the PPTS.

*1. 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.*

*2. For the purposes of this planning policy, “travelling showpeople” means:*

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.*

26. In late 2025 a note was circulated to all Local Planning Authorities in England on behalf of Friends, Families and Travellers - a leading national charity that supports the Travelling Community. The note was prepared by Marc Willers KC from Garden Court Chambers and sought to provide an independent legal opinion on the interpretation and application of the revised planning definition of a Traveller contained in Annex 1 of the PPTS (2024).

27. ORS have reviewed the legal opinions of Marc Willers KC and agree with his conclusions in that the current PPTS planning definition of a Traveller now includes a requirement to assess the accommodation needs of *all* ethnic Gypsies and Travellers, also including New Travellers, but excludes economic travellers (i.e. Van Dwellers etc.).

28. This is the same conclusion that ORS reached in their review of the 2024 PPTS planning definition when it was issued in December 2024 and this is reflected in our current approach to the methodology, analysis and reporting of our current GTAA studies, including in Waverley:

- » Following the changes to the PPTS in 2024 the planning definition of a Traveller now includes all other persons with a cultural tradition of nomadism or of living in a caravan.
- » As a result of this it can be concluded that *all* ethnic Gypsies and Travellers now meet the PPTS 2024 planning definition of a Traveller.
- » There were no changes to the planning definition of a Travelling Showperson made in 2024 but it is assumed that *all* Travelling Showpeople will meet the Annex 1 planning definition.

## **Undetermined Households**

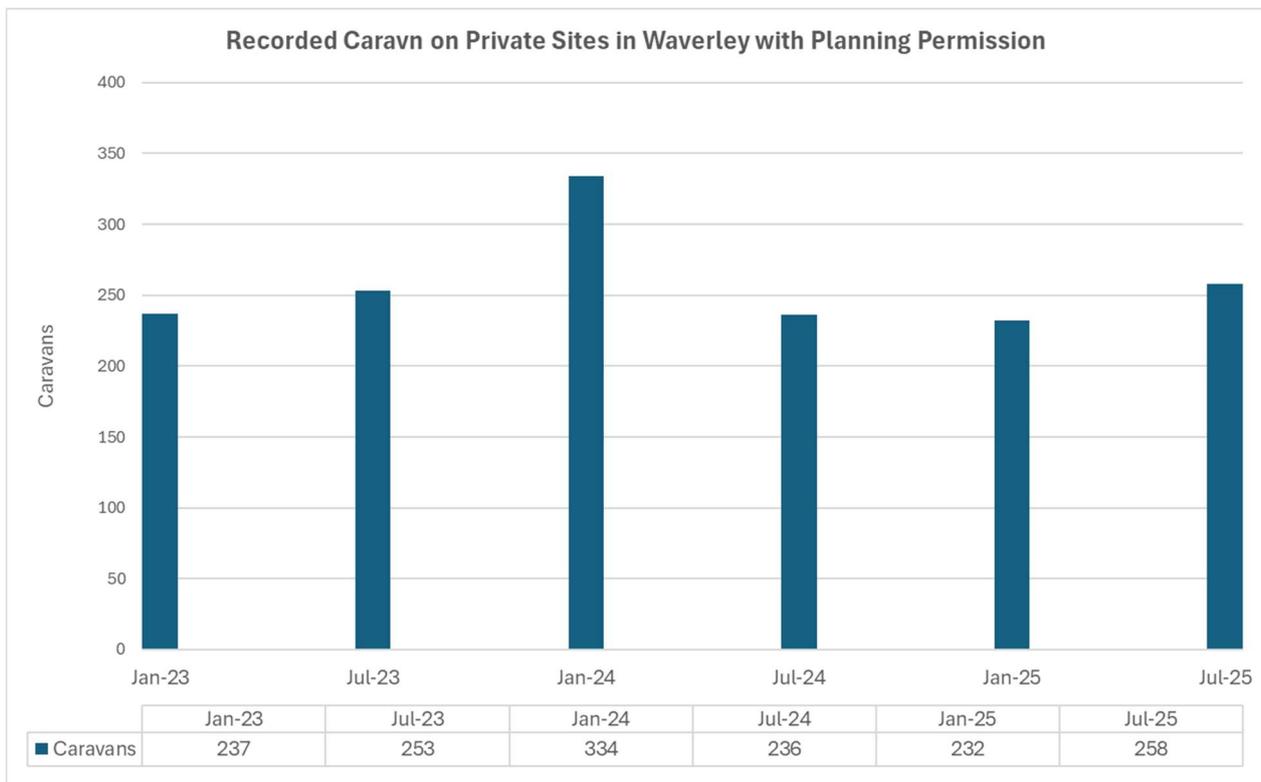
29. As well as calculating need for interviewed households that met the 2024 planning definition, the needs of households where an interview was unable to be completed (either due to refusal to be interviewed or households that are not present during the fieldwork period) were also assessed as part of the 2025 GTAA where they were believed to be Gypsies and Travellers who would meet the 2024 planning definition.

30. There is no guidance that sets out how the needs of these households should be addressed. However, an approach was taken that sought a best estimate of current and future need from these households.
31. The estimate sought to identify potential current and future need from any pitches/plots known to be temporary or unauthorised; through modelling need from concealed/doubled-up households, and from teenagers based on the outcomes from completed interviews; and through an estimate of new household formation.
32. The modelling applies the proportion of need from households that were interviewed to the Undetermined Households. This modelled need is also accounted for in an increased base for the calculation of future household formation.
33. Following the changes to the planning definition in PPTS 2024 it has been assumed that all Undetermined Households will meet the planning definition.
34. The ORS methodology to address the need arising from Undetermined Households was supported by the Planning Inspector for a Local Plan Examination for Maldon Borough Council, Essex. In his Report that was published in June 2017 (**Appendix 7**) he concluded:

*150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. Whilst there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist.*

### Traveller Caravan Count

35. For other ongoing appeals relating to sites at Lydia Park (including those on sites adjacent to the appeal sites) it has been contended by Appellants that the MHCLG Traveller Caravan Count suggests that there has been a significant increase in numbers of recorded caravans occupied by Gypsies and Travellers in recent years in Waverley, and that this suggests a growing Traveller population, and therefore increased levels of potential need.
36. I have always been very critical of the Traveller Caravan Count. As this count is of caravans and not households or people, it makes it very difficult to interpret for a GTAA because it does not count pitches or resident households or their demographic make-up. The count is merely a ‘snapshot in time’ conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be included.
37. As such I do not consider it appropriate to use the outcomes from the Traveller Caravan Count to support any calculation of current and future need as the information collected by ORS during our site visits is more robust and fit-for-purpose.
38. The chart below from the Traveller Caravan Count does show a year-on-year increase in the numbers of recorded caravans in Waverley on private sites with permanent planning permission up until January 2024. However, due to enforcement action undertaken by the Council number have now dropped.



39. Since the previous GTAA was published in 2018 permission has been granted for a significant number of new sites and pitches in Waverley with the majority having been permitted on land to the south of the appeal sites and north of the established sites at Lydia Park and New Acres.
40. Waverley Borough Council are in the process of investigating a large number of these sites as they have been populated with large numbers of caravans well in excess of what has been permitted. It has become apparent

to the Council from a combination of site visits, reports to the Council, and information obtained online that a substantial number of these caravans are occupied by non-Travellers. A large number of online adverts indicate that caravans on many of these sites are being advertised for rental on the open market. The increase in the number of caravans and the occupation by non-Travellers appears to have occurred largely since 2022.

41. The implications of this in terms of a reliance on the Caravan Count figures is that the large increases of caravans recorded on sites with permanent planning permission are not in fact an indicator of need, but a count of caravans occupied by non-Travellers which actually suggests that the need that was identified when the permissions were granted may not in fact have existed.
42. The drone image below from August 2024 illustrates this point extremely well and shows that the majority of sites that were granted based on a need for pitches for Gypsies and Travellers are not occupied by Travellers. The Council and ORS have evidence to support this assertion. The appeal sites are at the south west of the drone image highlighted with stars.



Land at Stovolds Hill, Cranleigh  
Total mobile homes on site (as of 28/08/2024)

43. These views have been backed up by both Council Officers and ORS Researchers who have visited these sites during the ongoing fieldwork for the new GTAA. Many of the caravans are being rented out to professionals and healthcare workers who are struggling to find other affordable accommodation in the area. This is common place all across the country and is indicative of systemic problems with a lack of social and affordable housing.
44. There are also numerous adverts on social media advertising caravans to rent on parts of these sites for up to £1,200/month. This strongly suggests that a large scale rental operation is in place and that the caravans are not needed to meet a locally identified need for Gypsy and Traveller pitches in Waverley.

## 5-year supply

45. The purpose of this section of my Proof is to demonstrate that Waverley Borough Council can currently demonstrate a 5-year supply of pitches for Gypsies and Travellers based on the outcomes of the new GTAA.
46. Paragraph 10(a) in the PPTS sets out that Local Planning Authorities should, in producing their Local Plan *identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets* [the most up-to-date GTAA dated December 2025].
47. Footnote 4 to Paragraph 10 in the PPTS then sets out the 3 key deliverability tests that need to be met for a site/pitch to be considered as a component of 5-year supply [my emphasis added]:

*...to be considered deliverable, sites [pitches] should be **available now**, offer a **suitable location** for development, and **be achievable** with a realistic prospect that development will be delivered on the site [pitch] within 5 years. Sites [pitches] with planning permission **should be considered deliverable until permission expires**, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites [pitches] have long term phasing plans.*

## Updated 5-Year Supply for Gypsies and Travellers – January 2026

48. Now that a new GTAA and Pitch Deliverability Assessment (PDA) have been completed for Waverley, and a set of detailed evidence based Proformas have been prepared for each site that has been included in the PDA (**Appendix 8**), I have completed an updated appraisal of deliverable 5-Year Supply based on the robust local evidence base from the new GTAA/PDA.
49. Taking the new GTAA into consideration (including a review of planning applications that have been approved and implemented for occupation by Gypsies and Travellers that are currently either not occupied or are currently occupied by non-Travellers), and the outcomes of the PDA, in my professional view I am of the opinion that the Council can currently demonstrate in excess of a deliverable 5-year supply for Gypsies and Travellers against a current need target of 50 pitches for the period to 2029/30 identified in the December 2025 GTAA (including need from Undetermined Households). This comprises 37 pitches for households that meet the 2024 PPTS planning definition and 13 pitches for Undetermined Households (2025 GTAA Report Figure 2 – **Appendix 1**).
50. The outcomes of the PDA are that a total of 58 pitches (see Chapter 9 in the 2025 GTAA Report for a summary – **Appendix 1**) can be delivered on existing sites that meet the 3 deliverability tests set out in Footnote 4 to Paragraph 10 of the PPTS (49 for households that meet the 2024 PPTS planning definition and 9 for Undetermined Households). See the table below and also **Appendix 8** for full details for each site.

**PPTS 2024 Current Need (Green Sites)**

Site Ref	Site Name	5-Year Need	Need Met	Need Residual
WAV – 001	The Willows, Runfold	3	1	2
WAV – 002	9 Burnt Hill, Dunsfold	3	3	0
WAV – 003	Bridge View, Runfold	1	1	0
WAV – 004	Hazelwood, Bramley	4	4	0
WAV – 006	Hop Meadows, Runfold	2	2	0
WAV - 017 (10)	Land north of 12A Lydia Park - Yellowstone Park	0	0	0
WAV - 017 (8)	Land north of 11A Lydia Park (1) - Plot 16	0	0	0
WAV - 017 (6)	Land north of Lydia Park - Plot 18	1	1	0
WAV - 017 (2)	Land north of Lydia Park (3) - North of Homestead	0	0	0
WAV - 017 (01)	Land to the north of Lydia Park (4) - The Homestead	0	0	0
WAV - 017 (04)	Land north of Lydia Park (5) - Plot 40 (Land at Stovolds Hill)	1	1	0
WAV - 017 (11)	Land north west of Lydia Park - Ranch Park	0	0	0
WAV - 017 (15)	Land to the West of Lydia Park (Weeping Willow)	2	2	0
WAV – 008	Legend Acres, Farnham	0	0	0
WAV – 009	Lydia Park, Cranleigh	11	11	0
WAV – 010	New Acres, Cranleigh	0	0	0
WAV – 013	Pollingfold Place, Ellens Green	4	4	0
WAV – 020	Thornfields, Badshot Lea	0	0	0
WAV – 016	Twin Oaks, Cranleigh	4	4	0
WAV – 025	Adjacent Burnt Hill Caravan Site, Dunsfold	0	0	0
WAV – 006	Hop Meadows, Runfold	5	5	0
WAV - 017 (16)	Land to the West of Lydia Park (Weeping Willow)	10	10	0
<b>TOTAL</b>		<b>51</b>	<b>49</b>	<b>2</b>

**Undetermined Current Need (Green Sites)**

Site Ref	Site Name	5-Year Need	Need Met	Need Residual
WAV – 007	Kilinside Place, Badshot Lea	1	1	0
WAV - 017 (14)	Land north of Lydia Park Centred Coordinates 502164 137703 (2)	1	1	0

WAV – 009	Lydia Park, Cranleigh	6	6	0
WAV - 017 (9)	Land adjoining 12 Lydia Park - Plot 15	1	1	0
<b>TOTAL</b>		<b>9</b>	<b>9</b>	<b>0</b>

51. The GTAA also included a supply of 28 pitches on sites with full planning permission that have been implemented and should therefore be considered deliverable until permission expires. Whilst these pitches are currently either vacant or occupied by non-Travellers, as they have all been implemented they will count towards the supply irrespective of current occupants. All of these pitches are on sites at Lydia Park. The table below provides details of the sites.

52. It should be noted that the majority of the sites at Lydia Park that have been put forward as available 5-year supply in the GTAA were considered by an Inspector at a recent Inquiry for a site in Waverley at Land Rear of Burnt Hill, 7 Plaistow Road (APP/R3650/C/24/3337697 – **Appendix 9**) that was held in June 2024. In his Decision Notice dated 25th July 2024 the Inspector concluded the following in relation to available supply (note that this was in relation to supply identified in the previous GTAA and not the December 2025 GTAA):

*68. It is also agreed that there is sufficient supply to meet that requirement during the plan period. The appellant puts the figure at 66 (i.e. 3 above the requirement) while the Council contends it is 76. The difference of 10 is accounted for by the appellant’s approach of not including two personal planning permissions in the supply.*

*70. Here, it appears that the two sites subject to personal planning permissions are occupied and so fulfilling the purpose of providing pitches for Gypsy/Traveller families. In so doing, they form part of the supply of pitches. When those families leave the sites, the sites will cease to form part of the supply, unless the conditions are changed or removed so that the sites can be occupied by other families. But on the basis of the evidence before me, they form part of the current supply of pitches.*

PDA Ref no.	Site Address (on PDA template)	Relevant Planning permission(s)	Approved and implemented pitches	Approved pitches that are vacant or occupied by non-Travellers
WAV - 017(1)	Land to the North of Lydia Park, Painshill Copse, Stovolds Hill, Cranleigh GU6 8LE	WA/2020/0551	7	2
WAV - 017(2)	Land to the North of Lydia Park, Painshill Copse, Stovolds Hill, Cranleigh	WA/2020/0516 & WA/2025/01859	9	9
WAV - 017(3)	Land Coordinates 502327 137818, Stovolds Hill, Cranleigh	WA/2025/00451	2	0
WAV - 017(4)	Land at Stovolds Hill, Cranleigh	WA/2021/03196	2	2

WAV - 017(5)	Land North of Lydia Park, Stovolds Hill, Cranleigh	WA/2019/1265	3	1
WAV - 017(6)	Land North of Lydia Park, Stovolds Hill, Cranleigh	WA/2019/1265	3	0
WAV - 017(7)	Land North of Lydia Park, Stovolds Hill, Cranleigh	WA/2019/1265	3	1
WAV - 017(8)	Land North of 11a Lydia Park, Stovolds Hill, Cranleigh	WA/2018/1364	1	1
WAV - 017(9)	Land adjoining 12 Lydia Park, Stovolds Hill, Cranleigh GU6 8LE	None	0	0
WAV - 017(10)	(Yellowstone Park), Land north of 12a Lydia Park, Stovolds Hill, Cranleigh	WA/2020/1866	9	7
WAV - 017(11)	Ranch Park, Crocus Lane, Cranleigh	WA/2021/02392	5	5
WAV - 017(12), WAV - 017(13)	Land North of Lydia Park Centred Coordinates 502164 137703, Stovolds Hill Cranleigh	WA/2019/0515	4	Unknown
WAV - 017(14)	Land North of Lydia Park Centred Coordinates 502164 137703, Stovolds Hill Cranleigh	WA/2023/00443	3	Unknown
WAV - 017(15)	(Weeping Willow), Land to the West of Lydia Park, Stovolds Hill Cranleigh	WA/2017/0176	3	0
WAV - 017(16)	(Weeping Willow), Land to the West of Lydia Park, Stovolds Hill Cranleigh	None	0	0
<b>TOTAL</b>			<b>54</b>	<b>28</b>

53. In summary the table below sets out my views on the current 5-year land supply for Gypsies and Travellers in Waverley and demonstrates that as a result of the outcomes of the PDA, the Council can currently demonstrate in excess of the required 5-year supply for 50 pitches identified in Figure 2 of the GTAA.

<b>Current 5-Year Need Target to 2029/30 (2025 GTAA Report – Figure 2)</b>	<b>50 Pitches (37 Meet 2024 PPTS Definition; 13 Undetermined)</b>
PDA Outcomes (2025 GTAA Report – Figure 17, and Appendix 1 below)	58 pitches (49 Meet 2024 PPTS Definition; 9 Undetermined)
<b>Current 5-Year Supply to 2029/30</b>	<b>58 Pitches</b>
<b>Surplus 5-Year Supply to 2029/30</b>	<b>8 Pitches</b>

54. The outcomes of the PDA form a substantial proportion of the 5-year supply. In my professional opinion, based on the methodology that was used to complete the PDA, including a full review of development management constraints and engagement with Travellers living on sites where need was identified, all of the identified pitches should be considered as deliverable under the requirements of Footnote 4 to Paragraph 10 of the 2024 PPTS.

55. Therefore, in my professional opinion the Council are currently able to demonstrate in excess of a 5-year supply of pitches (8) against the current need that has been identified in the December 2025 GTAA (50).

56. It should also be noted that the PDA concluded that all of the 5-year need from Travelling Showpeople (6) can be met in on yards Waverley.

## **Conclusion on Need and Supply for Gypsies and Travellers in Waverley**

57. The ORS GTAA approach has been repeatedly assessed as robust by Planning Inspectors.
58. A new GTAA has been prepared for Waverley and this was published in January 2026. This also included detailed work to complete a PDA.
59. The new GTAA provides a robust and credible evidence base which can be used by the Council to aid the preparation and implementation of Local Plan Policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period to 2044/45.
60. The GTAA was completed following a robust methodology based on industry standards as set out in a range of current Legislation and Government Guidance.
61. Overall, it has contended that the GTAA is likely to be an underestimate of need for Gypsies and Travellers in Waverley, and that there is still unmet need.
62. The very fact that a significant number of caravans on sites that were granted planning permission on land south of the appeal sites are occupied by non-Travellers adds further weight to the fact that there is no local unmet need for pitches in Waverley.
63. I have demonstrated that against the findings in the new GTAA and PDA the Council can currently demonstrate in excess of a 5-year supply of pitches for the period to 2029/30.
64. Taking all of these points into consideration, I am confident that the overall accommodation needs for Gypsies, Travellers and Travelling Showpeople in Waverley that has been identified in the new GTAA are accurate and robust, and in line with current national policy and guidance, and the Council can demonstrate in excess of a 5-year supply for the period to 2029/30 for all Gypsies, Travellers and Travelling Showpeople.

**Appendix 1**

Waverley GTAA Report December 2025

**Appendix 2**

Central Bedfordshire Appeal Decision Notice

**Appendix 3**

Chelmsford Appeal Decision Notice -

**Appendix 4**

Doncaster Appeal Decision Notice

**Appendix 5**

Forest of Dean Appeal Decision Notice

**Appendix 6**

Guildford Appeal Decision Notice

**Appendix 7**

Maldon Local Plan Inspectors Report

**Appendix 8**

Waverley PDA Proformas

**Appendix 9**

Waverley Appeal Decision Notice