



Town & Country Planning Act 1990

(as Amended)

The Town & Country Planning (Inquiries Procedure)

(England) Rules 2000 (SI 2000/1624)

Appeals by:

(A) Mr Thomas Doherty against the refusal of planning permission by Waverley Borough Council for: Change of use of land for the creation of 1 no. gypsy/traveller pitch, comprising the siting of 1 no. mobile home, and 1 no. touring caravan with formation of hardstanding at Land North of Lydia Park, Stovolds Hill, Cranleigh.

Planning Inspectorate Reference: APP/R3650/W/22/3313865

LPA Reference: WA/2022/02625

(B) Mr Simon Doherty against the refusal of planning permission by Waverley Borough Council for: Change of use of land to provide 3 gypsy pitches comprising 3 chalet bungalows (static caravans), and 3 day rooms, and associated works including provision for up to 4 no. touring caravans and construction of hardstanding at Land North of Lydia Park, Stovolds Hill, Cranleigh.

Planning Inspectorate Reference: APP/R3650/W/23/3314447

LPA Reference: WA/2022/02766

(C) Mr Mark Doherty and Mrs Allana Doherty against the refusal of planning permission by Waverley Borough Council for: Change of use to use as a residential caravan site for 1 gypsy/traveller family, comprising 1 no. static mobile home (caravan) and a 1 no. touring caravan, 1 no. day room, hardstanding to provide parking (part retrospective) at Plot 4 Site 1, Land North of Lydia Park, Stovolds Hill, Cranleigh.

Planning Inspectorate Reference: APP/R3650/W/23/3322400

LPA Reference: WA/2023/00371

(D) Mr Matthew Doherty against the refusal of planning permission by Waverley Borough Council for: Change of use to use as a residential caravan site for 1 gypsy/traveller family, comprising 1 no. Static Mobile Home (caravan) and a 1 no. touring caravan, 1 no. day room, hardstanding to provide parking (part retrospective) at Plot 3, Site 1, Land North of Lydia Park, Stovolds Hill, Cranleigh.

Planning Inspectorate Reference: APP/R3650/W/23/3323108

LPA Reference: (WA/2023/00470

Response to WSP&A Need & Supply Rebuttal Statement (April 2026)

**Steve Jarman
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Opinion Research Services Ltd.**

May 2026

Background

1. This Statement responds to the most recent evidence submitted by WS Planning & Architecture (WSP&A) in their Need & Rebuttal Statement (the Statement) dated April 2026 in relation to Appeals A and B. As set out in Paragraph 1.3 of the Statement it is understood that Mr. Rowe, on behalf of appellants for Appeals C and D will adopt the position provided by WSP&A in respect of Appellants within Appeals A and B.
2. My Statement will only address points that have been raised in the WSP&A Statement and will not seek to repeat any evidence that I have already submitted to this Inquiry unless absolutely necessary.
3. The 2025 Waverley GTAA Report contains detailed background and methodology chapters that set out the approach that was undertaken to complete the GTAA and PDA.
4. My Proof (October 2024) contains detailed information to support the robustness of the methodology that was used to complete the 2017 GTAA for Waverley, and that the Council can demonstrate a deliverable supply of pitches for the full Local Plan period to 2032 based on the outcomes of the previous GTAA.
5. My Rebuttal Statement (October 2024) addresses the need and supply issues that WSP&A and PROwe Planning Solutions have raised in their Proofs of Evidence together as the responses to issues raised by WSP&A will also address the more general issue raised by PROwe Planning Solutions.
6. My Supplementary Statement (January 2026) seeks to demonstrate that the Council have a 5-year supply based on the outcomes of the most recent GTAA.
7. My evidence in this Statement 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**).
8. 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 detailed outcomes of the PDA (**Appendix 2**) have informed my review of current 5-year land supply for Waverley.

Key Issues Relating to the GTAA – Need and Supply

9. The Statement prepared by WSP&A dated April 2026 sets out a range of issues relating to need and supply in relation to the Waverley GTAA/PDA Report (December 2025) that I will seek to address but these have been summarised by WSP&A in Paragraph 1.4 which states:

In summary of the appellants position, it is submitted that the LPA cannot demonstrate an up-to-date five year supply of sites, and the evidence presented within the new Gypsy, Traveller Accommodation Assessment (GTAA) and its accompanying Pitch Deliverability Assessment (PDA) do not change the conclusions reached.

10. The WSP&A Statement contains 3 sections relating specifically to need and supply, together with overall conclusions:
 - » 2.0: The GTAA – Figures of Need.
 - » 3.0: The PDA – The Supply of Sites.
 - » 5.0: Relevant Appeal Decisions.

» 6.0: Conclusions.

11. In my Statement I will seek to challenge the issues that have been raised by WSP&A in these sections of their Statement. I will seek to address the key issues raised by WSP&A in the order that they are set out in the Need & Supply Rebuttal Statement.

Section 2.0: The GTAA – Figures of Need

12. Section 2 of the WSP&A Statement deals specifically with the new 2025 Waverley GTAA and the understanding that the assessment was undertaken under the requirements of the PPTS (2024) which introduced a revised definition of a Traveller for planning purposes. I can confirm that this is correct and the GTAA now assumes that *all* Travellers meet the 2024 PPTS planning definition.
13. Paragraphs 2.4 to 2.9 in the Statement content that the 2024 PPTS planning definition does not apply exclusively to the Travellers, but also to those who lead a nomadic way of life, and that the GTAA is wrong to exclude 'non-Travellers' in the analysis of need. Whilst I agree in principle with these views, I am firmly of the opinion that all of the 'non-Travellers' who were identified living on sites in Waverley during the fieldwork for the GTAA did *not* lead a nomadic way of life and were simply people renting caravans to reside in due to a severe shortage of social housing or a lack of private rental accommodation, or prohibitive private rental costs in Waverley and the wider area. I am also of the view that many of the 'non-Travellers' identified in the GTAA may not be eligible to access social housing or may not be eligible to be in the UK.
14. Paragraph 2.10 in the Statement contends that the GTAA does not take proper account of Travellers living in bricks and mortar (B&M) accommodation. The GTAA report clearly sets out the approach that was taken to engage with households living in bricks and mortar and that no need was identified.
15. The final issues raised in Paragraphs 2.11 to 2.12 related to perceived inaccuracies in the GTAA relating to 4 specific sites – Legend Acres (WAV-008), Old Mill Farm (WAV-011), Twin Oaks (WAV-016), and Wisteria (WAV-019).
16. For Legend Acres WSP&A contend that there should be 5 and not 4 pitches recorded in the GTAA baseline. At the time of the GTAA fieldwork for this site (June 2024) there were only 4 households living on the site and also a number of unoccupied mobile homes and the households who were interviewed stated that there was currently a planning application in for 8 additional pitches. Having reviewed the planning history for this site it is my view that it has permission for 5 mobiles across 4 pitches so the GTAA baseline is therefore correct.
17. ORS agree that the temporary planning permission for 1 pitch granted for Old Mill Farm has now expired having only been granted for 4 years in March 2017. However, it is my view that this site should now be considered as being tolerated for planning purposes given that the initial permission for the site was granted in 2013 and that it would not add any additional need to the outcomes of the GTAA.
18. Regarding Twin Oaks WSP&A contend that this site now has pending application for a permanent dwelling which would result in the loss of a Traveller pitch. I can confirm that this permission for a dwelling house is for the current residents of the site simply seeking more permanent accommodation on their site to meet the needs of their family.
19. The same is the case for Wisteria where permission for a dwelling house is for the current residents of the site simply seeking more permanent accommodation on their site to meet the needs of their family.
20. Finally in Paragraph 2.17 WSP&A content that *the assessment is still riddled with errors, uncertainties, and the lack of any assurance that it is correct in its assessment. What it does however provide for this Inquiry is the likely minimum scale of need within the Borough* – but do not provide any further local evidence to seek to substantiate these claims. I contend that the baseline was correct at the time the GTAA was completed.

Section 3.0: The PDA - Supply of Sites

21. The next section of the WSP&A Statement deals specifically with the PDA that ORS completed for Waverley as part of the overall GTAA study. Details of the PDA can be found in Chapter 9 of the GTAA Report (**Appendix 1**) and more detailed outcomes can be found in the PDA Matrices (**Appendix 2**).
22. The first set of issues raised by WSP&A are in relation to pitch turnover in Paragraphs 3.2 to 3.14. These issues primarily deal with the assertions made in the GTAA Report in Paragraphs 3.40 to 3.34 that pitch turnover has not been considered as a formal ongoing component of supply, other than the natural turnover of pitches over time to potentially meet future need.
23. WSP&A appear to be of the view that the supply from 28 implemented pitches (therefore meeting the 3 PPTS Footnote 4 tests) in the GTAA that are either unoccupied or occupied by non-Travellers (renters) constitute pitch turnover. This is not the case. Pitch turnover is usually associated with the supply of pitches on public or socially rented sites where an assumption is made that if on average XX pitches become available each year that this figure should be applied annually for the full GTAA period. Paragraphs 3.40 to 3.34 in the GTAA report set out clear reasons why such assumptions should not be made.
24. In Paragraph 3.7 WSP&A set out the following point – *‘those pitches cannot reasonably be treated as part of a firm and deliverable five-year supply. Deliverability must be based on clear evidence’*. In my view, given that these pitches have been granted planning permission and have been implemented they do fundamentally meet the three deliverability tests in Footnote 4 of the PPTS and therefore can therefore be legitimately included as supply.
25. The next Paragraphs in section 3.0 in the WSP&A Statement raised a number of site specific issues in relation to the outcomes of the PDA which has concluded that a total of 58 pitches could be delivered within 5 years to contribute towards meeting a 5-year supply target. Paragraph 3.16 in the WSP&A Statement includes the table that is included in my Supplementary Statement which, for each site, sets out identified need for pitches, need for pitches that could be met, and residual need for pitches that cannot in principal be met at this time.
26. The first issue raised by WSP&A is in Paragraph 3.17 where they claim that there is an error in the GTAA/PDA through the inclusion of the site at Hop Meadows twice. The reasons for this are clearly set out in Figure 6 in the GTAA report where Hop Meadows is indeed recorded twice – once for 5 authorised pitches and then also for 4 unauthorised pitches.
27. The WSP&A Statement then considers each of the sites in the PDA Matrices (**Appendix 2**) and I will respond to their comments. However there are a number of recurring themes that are raised for many of the sites in relation to flood risk issues, Thames Basin Heaths SPA contributions, and suggested pitch sizes set out in Local Plan Policy DM37. I will deal with these 2 issues first and then proceed with my response to any other site specific issues.
28. With regard to flood risk WSP&A’s comparison appears to overlook a fundamental distinction between the appeal sites and the identified PDA sites. The PDA sites do not propose any new operational development or the siting of caravans within land that is at risk of flooding. Although some existing access routes may pass through areas of potential surface water flood risk, the proposed development itself would not place existing

occupants in harm's way, nor would it alter ground conditions in a manner that increases flood risk elsewhere.

29. By contrast, the appeal sites involve unlawful development already constructed within areas of high surface water flood risk, which has both exposed other nearby sites/residents to avoidable flood hazard and displaced floodwater, thereby increasing risk to surrounding land.
30. Having spoken with the LPA their position is therefore entirely consistent with these points. The PDA sites are deliverable because they do not introduce any new development within flood affected land, whereas the appeal sites are unacceptable because new unlawful development has occurred within high flood risk areas, exposing occupants to harm and increasing flood risk elsewhere on nearby sites.
31. WSP&A's criticism of the PDA sites in relation to the Thames Basin Heaths SPA overlooks the fact that the recreational pressure resulting from development can be mitigated through the provision of SANG or through a financial contribution to an established SANG.
32. While some of the PDA sites fall within the Zone of Influence, none propose development without the necessary avoidance and mitigation measures required by the Thames Basin Heaths SPA Avoidance Strategy. In practice, impacts can be appropriately mitigated through SANG and SAMM contributions, typically secured via legal agreements and Grampian conditions (each at a cost of approximately £3k).
33. Crucially, the private sites identified in the PDA have already entered into such agreements previously to secure planning permission for existing lawful pitches. There is therefore a clear and demonstrable track record of landowners accepting and delivering these required financial contributions. It is entirely reasonable therefore to expect that they would be in a position to do so again for any additional pitches or caravans, meaning there is no basis for discounting these sites on the grounds advanced by WSP&A.
34. Finally, Local Plan Part 2 Policy DM37 sets out that [emphasis added] *New Gypsy and Traveller sites should measure at least 500 square metres (unless extended families are sharing facilities, in which case their needs will be assessed individually)*. It should be noted that the vast majority of the deliverable pitches identified in the Waverley PDA are on private sites occupied by extended families. Therefore, it is my view that the exceptions set out in Policy DM37 would apply to the sites identified in the PDA as being deliverable.
35. I will now seek to briefly address the key issues raised by WSP&A in relation to individual sites that have been included in the PDA outcomes (**Appendix 2**).
36. Paragraphs 3.19 to 3.22 in the WSP&A Statement deal with **The Willows, Runfold (WAV-001)** and set out that any proposed expansion or intensification of this site would have to occur within Flood Zone 3 and would impact upon woodland or habitat areas – therefore raising issues with regard to Biodiversity Net Gain. They also raise issues relating to Thames Basin Heaths SPA which I have already addressed above.
37. I can confirm that the PDA outcomes for The Willows do not rely on any expansion into woodland or habitat areas. WSP&A's arguments about Biodiversity Net Gain are therefore misplaced. The PDA does not propose any development beyond the existing operational area of the site, specifically identifying an area currently used for storage purposes to deliver 1 additional pitch.
38. Paragraph 3.23 in the WSP&A Statement deals with **9 Burnt Hill (WAV-002)** and contends that the additional pitches would conflict with Policy DM37 which suggests a pitch size on 500m² unless extended families are sharing facilities. As this is a private site occupied by and extended family the exceptions under Policy DM37 would apply in this case. Further discussions with the LPA have confirmed that the extent of this site which

encompasses the land subject of the WA/1997/0581 and WA/2002/2269 planning permissions for the site – measures 0.62ha and that 2 additional pitches, as proposed within the PDA, can be accommodated comfortably on the site.

39. Paragraphs 3.24 to 3.27 in the WSP&A Statement deal with **Bridge View (WAV-003)** and question issues relating to the ownership of the site, as well as issues relating to Policy DM37. They also question whether the plan included in the PDA exceeds the extent to which the site has planning permission. In response to the last point, it is understood that the site has been extended but that this does not include any residential accommodation. The Council have also confirmed that the site is subject to 3 separate Land Registry Titles - SY432551, SY658200 and SY797563 – all of which are understood to be in common ownership by members of an extended family. Given that the site is occupied by members of an extended family the exceptions under Policy DM37 would apply in this case.
40. Paragraphs 3.28 to 3.30 in the WSP&A Statement deal with **Hazelwood (WAV-004)** and raise issues regarding potential Flood Zone 2 risks. I have dealt with Flood Risk issues above and can confirm that the PDA has identified that any additional pitches/caravans can be delivered outside of Flood Zone 2 areas of the site.
41. Paragraphs 3.31 to 3.33 in the WSP&A Statement deal with **Hop Meadows (WAV-006)** and raise issues relating to Policy DM37 as well as potential Flood Zone 2 issues and the Thames Basin Heaths SPA. I have dealt with Flood Zone and the Thames Basin Heaths SPA issues above and again given that the site is occupied by members of an extended family the exceptions under Policy DM37 would apply in this case.
42. Paragraph 3.36 in the WSP&A Statement deals with **Land north of Lydia Park – Plot 18 (WAV-017 06)** and questions whether the additional pitch identified in the PDA is double counted as supply in the GTAA. I can confirm that the pitch included in the PDA is in addition to the pitches that benefit from planning permission and that there is no double counting.
43. Paragraph 3.39 in the WSP&A Statement deals with **Land north of Lydia Park (5) – Plot 40 (WAV-017 04)** and asserts that the 2 pitches are included in the supply of 28 pitches in the GTAA and that as they were occupied and interviewed they should not count towards the supply. I accept that this may be an error and that this may result in a reduction of supply in the GTAA from 28 pitches to 26 pitches. This will be confirmed in due course.
44. Paragraph 3.41 in the WSP&A Statement deals with **Land to the west of Lydia Park – Weeping Willow (WAV-017 05)** and the only issues raised are in relation to potential Flood Risk. I have already dealt with this above.
45. Paragraph 3.43 in the WSP&A Statement deals with **Lydia Park (WAV-009)** and the only issues raised are in relation to potential Flood Risk. I have already dealt with this above.
46. Paragraph 3.45 to 3.46 deal with **Pollingfold Place (WAV-013)** and the issues that are raised are that the previous Appeal Decision identified potential conflicts with Local Plan Policies D1 and D4 of the Waverley Local Plan and with Policy AHN4 of the Waverley Local Plan Part 1 in relation to potential harm to the occupiers of neighbouring properties. Issues are also raised in relation to the site being located close to the National Landscape.
47. The Waverley Local Plan 2002 (WLP) has now been replaced. Policy D1 and D4 of this Local Plan have been superseded by Policy TD1 of the Waverley Local Plan Part 2.
48. The relevant appeal decision (3230531) for planning permission ref. WA/2018/1474.

'Conditions can be imposed to prevent commercial activities. There is scope to amend the layout and provide a buffer to the western boundary. There is unlikely to be much noise arising from residents using the day rooms. However, even so, outdoor activity would still be considerable and the effect on the living conditions of nearby occupiers, with particular reference to noise and disturbance, would still be detrimental. There would be conflict with Policies D1 and D4 of the WLP and Policy AHN4 of the LP Part 1 in respect of this issue as the development would be significantly harmful to the occupiers of neighbouring properties. This finding is broadly consistent with those of the 2006 appeals Inspector.'

49. The Inspector's concerns in the earlier appeal related specifically to the relationship between the operational parts of the site and the neighbouring dwellings to the west.

50. The approved site layout for WA/2018/1474 demonstrates that the pitches were arranged with generous internal spacing and, in the north-west section of the site, significant separation to the western boundary. The LPA maintains that a proposed intensification of 4 additional pitches would respects that principal and that additional pitches can be positioned so that activity remains concentrated toward the centre and eastern parts of the site, away from the sensitive western edge.

51. With regard to the National Landscape issue the Inspector concluded in Paragraph 26 of the Decision:

'In conclusion, the development would have some adverse effects on the character and appearance of the area. As a result, there would be conflict with Policies RE1 and RE3 of the LP Part 1 and Policy D1 of the WLP, as the intrinsic character and beauty of the countryside would not be safeguarded and the distinctive character of the landscape would not be respected.'

52. The Inspector's decision makes it clear that the harm identified arose from the *initial introduction* of caravans into a valued landscape, not from the absolute number of pitches. Crucially, the Inspector also found that the site's immediate surroundings are not characteristic of the wider landscape, being framed by large commercial buildings and existing development. He further stated that greater mitigation was achievable through revised layout and enhanced planting, with residual effects expected to be less than moderately adverse over time. Given this, it is the Council's position that an intensification on the site from 7 to 11 pitches - within an already altered and enclosed setting - would not materially change the nature or extent of landscape effects previously judged acceptable in the balance. With an updated layout and strengthened boundary planting, the additional pitches can be accommodated without giving rise to harm beyond that already assessed and found to be outweighed in granting permission.

53. Paragraph 3.48 in the WSP&A Statement deals with **Twin Oaks (WAV-016)**. I have already addressed the issues raised above in relation to this site.

54. Paragraphs 3.50 to 3.53 deal with **Land to the west of Lydia Park – Weeping Willow (WAV-017 16)** and set out issues relating to pitch numbers, Flood Risk, and Policy DM37. The site was visited during the fieldwork for the GTAA and this confirmed that there are 8 pitches – a number of which are occupied in multiple mobiles by the children of households occupying other pitches on the site. I have already dealt with Flood Risk as a general point above and given that the site is occupied by members of an extended family the exceptions under Policy DM37 would again apply in this case.

55. Paragraphs 3.54 to 3.57 in the WSP&A Statement deal with **Kilinside Place (WAV-007)** and initially contend that the site has 7 pitches. I think that this is incorrect as of the baseline date for the GTAA as the permissions are for 4 pitches (1 initial pitch and a further permission for 3 additional pitches under WA/2019/1022 and

WA/2026/00009 (to allow a reduction in the size of a dayroom). The Council have subsequently confirmed that following the completion of the GTAA they do have an open enforcement case for this site and they are in the process of issuing a PCN in respect of any additional caravans on this site and to seek to determine whether these are to meet any identified need.

56. The Council have also confirmed that the addition of a single pitch at this location would not conflict with Policy DM18 because the site sits within a substantial and already functioning buffer, the majority of which is formed by the extensive Tice's Meadow Nature Reserve to the east. That reserve, not the application site, provides the critical separation that prevents the coalescence of Farnham and Aldershot. The site itself is large, and an additional pitch can be comfortably accommodated within the existing developed envelope, retaining a meaningful undeveloped margin to the eastern boundary.
57. Paragraph 3.58 in the WSP&A Statement deals with **Land north of Lydia Park Centred Coordinates 502164 137703 (WAV017 14)** and the only issues raised are in relation to Flood Risk which I have already addressed above.
58. Paragraph 3.59 in the WSP&A Statement again deals with **Lydia Park (WAV-009)** in relation to modelled need from Undetermined Households. The only issues raised are in relation to Flood Risk and I have already dealt with these above.
59. Finally, Paragraph 3.60 in the WSP&A Statement deals with Land adjoining **12 Lydia Park – Plot 15 (WAV-017 09)** and again the only issues raised are in relation to Flood Risk and I have already dealt with these above.
60. Moving on, Paragraph 3.69 in the WSP&A Statement sets out that *'Deliverability under the Planning Policy for Traveller Sites requires that sites be available now, suitable, and achievable with a realistic prospect of delivery within five years'*. In my view this is exactly what the PDA outcomes provide evidence to demonstrate.
61. Paragraph 3.74 in the WSP&A Statement contends that the PDA *'does not allocate land and does not itself create additional supply. It is a tool that directs to a solution. That solution is, in the appellants view, unsuitable and unsatisfactory.'* This may be the case, but the PDA does fundamentally demonstrate that all of the identified pitches meet the PPTS Footnote 4 Deliverability Tests, and in the absence of a new Local Plan, provide the most up-to-date evidence for the Inspector to consider.

Section 5.0: Relevant Appeal Decision

62. Finally WSP&A set out in Section 5.0 a number of appeal decisions that they feel are relevant to this Inquiry.
63. Unfortunately I have not had time to fully consider all of these decisions but will summarise them, and a brief summary of my views so that the Inspector has this outline evidence before him.
64. In Paragraph 5.2 of the WSP&A Statement reference is made to a decision in Wakefield. My view is that this is not comparable with this case in Waverley as no PDA was completed in Wakefield.
65. In Paragraph 5.4 of the WSP&A Statement reference is made to a recent decision in Tandridge. My view is that this Inspectors Decision does not take account of or make reference to the PPTS Footnote 4 Tests when making his conclusions.
66. In Paragraph 5.7 of the WSP&A Statement reference is made to a decision in Cherwell where it is claimed by WSP&A that the Council had kept an up-to-date record of permissions that had been granted to support their claims of having a 5-year land supply. This is exactly what has been done in Waverley, along with the outcomes of the PDA which record a detailed planning history of all of the sites.
67. In Paragraph 5.8 of the WSP&A Statement reference is made to a decision in Mole Valley. In this case the Council's Local Plan Allocation relied on windfall sites – in Waverley there is a comprehensive PDA that sets out that the PPTS Footnote 4 Deliverability Tests can be met.
68. In Paragraph 5.9 of the WSP&A Statement reference is made to a decision in Dover and the Inspectors conclusions that there was no evidence to suggest that allocated/suggested sites were available. Again in Waverley the PDA there is a comprehensive evidence that sets out that the PPTS Footnote 4 Deliverability Tests can be met.
69. In Paragraph 5.10 of the WSP&A Statement reference is made to a decision in Buckinghamshire where the Inspector appears to conclude that identified sites to meet need are not available. Again in Waverley the PDA there is a comprehensive evidence that sets out that the PPTS Footnote 4 Deliverability Tests can be met.
70. In Paragraph 5.11 of the WSP&A Statement reference is made to a decision made in Wyre Forest where the Inspector appears to conclude that there is an over reliance upon turnover and the use of existing sites to meet identified need but without clear explanation as to how or which sites are to be expanded. Again in Waverley the PDA there is a comprehensive evidence that sets out that the PPTS Footnote 4 Deliverability Tests can be met.
71. Finally in Paragraph 5.12 of the WSP&A Statement it is contended that the outcomes of the Havering Local Plan Examination in 2019 did not set a precedent for the requirement for completing Pitch Deliverability Assessments. I represented Havering at the Examination and the Inspector specifically requested that the Council should provide evidence to show that their Local Plan Allocations were achievable and deliverable. As such, this resulted in the first PDA that was completed by ORS and that was subsequently accepted by the Local Plan Inspector. In my professional view a PDA provides a significantly higher degree of certainty that sites can be delivered against the need outcomes identified in a GTAA. Indeed, at a recent Local Plan Examination in St Albans in 2025 the Inspectors requested that the Council complete a PDA following the initial Examination Hearing Sessions.

Appendices

Appendix 1 – Waverley GTAA 2025

Appendix 2 – Waverley PDA Matrices 2025