



WOKINGHAM BOROUGH COUNCIL

Wokingham Borough Council
Gypsy and Traveller Five Year Housing Land
Supply Statement at 31 March 2025

June 2025

1. Introduction

- 1.1 This statement sets out an explanation of the five year land supply position for Gypsy and Traveller pitches within Wokingham Borough at 31 March 2025.
- 1.2 Assessment of deliverability is informed by the good officer relationship with the Gypsy and Traveller community, engagement with planning agents involved with the relevant planning applications, and officer knowledge of the sites.

2. National Policy

- 2.1 The requirement to demonstrate a five year land supply for Gypsies and Travellers is set out in the national planning policy document Planning Policy for Traveller Sites (PPTS) which was last updated in December 2024. Paragraph 10 requires local authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.

- 2.2 The PPTS defines 'deliverable' at footnote 4 as follows:

"To be considered deliverable, sites 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 within five years. Sites 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 have long term phasing plans."

- 2.3 It is clear from PPTS paragraph 9 that locally set targets, and consequently the requirement to demonstrate a five year supply of deliverable sites, should be based on the Gypsies and Travellers that meet the definition contained in Annex 1, which is:

"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."

- 2.4 It should be noted that the 2024 update to the PPTS amended the definition of Gypsies and Travellers included in previous versions to include individuals with a cultural tradition of nomadism.
- 2.5 Where a local planning authority is unable to demonstrate sufficient deliverable supply to provide five years worth of sites, PPTS paragraph 28 states:

“If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.”

- 2.6 The National Planning Policy Framework (NPPF) 2024 at paragraph 11d) states for decision taking:

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination⁹.”*

3. Monitoring requirement

- 3.1 This section sets out the basis against which the Council calculates the specific land supply position for Gypsy and Travellers.

- 3.2 The development plan for Wokingham Borough comprises the Wokingham Core Strategy 2010 and the Managing Development Delivery (MDD) Local Plan 2014.

a) Wokingham Core Strategy

- 3.3 Core Strategy Policy CP2 – Inclusive Communities refers to Gypsy and Traveller accommodation but does not set a local target. At the time of preparation targets were expected to be established through a partial revision to the South East Plan, the Regional Spatial Strategy for the area.

b) Managing Development Delivery Local Plan (MDD)

- 3.4 The Managing Development Delivery local plan (MDD) Policy TB10 – Traveller Sites is a criteria-based policy for the assessment of applications for Gypsy and Traveller related development. The MDD was adopted in 2014 and was examined in the context of the NPPF and PPTS (2012 versions).

Neither the Core Strategy or MDD set a local requirement for Gypsy and Traveller accommodation. In this absence, the Council consider supply against assessed need.

c) Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2023

- 3.5 The latest full assessment of accommodation needs for the Gypsy and Traveller community is the council's [Gypsy and Traveller and Travelling Showpeople Accommodation Assessment \(2023\)](#) (hereafter referred to as the GTAA 2023) published in August 2023.
- 3.6 The assessment identified a cultural need for 86 net additional pitches between 2022/23 and 2039/40. 53 of the 86 pitches represented the need of nomadic households. In reaching its conclusion, the assessment took into account all sites with permission for additional pitches. An overview of the need identified by the GTAA 2023 is set out in Table 1 below.

Table 1: GTAA 2023: Pitch requirement 2022/23 to 2039/40		
<u>Period (years)</u>	<u>Cultural need (pitches)</u>	<u>Of which PPTS Superseded need (pitches)</u>
5yr pitch need (2022/23 to 2026/27)	35	35
Longer-term need (2027/28 to 2039/40)	51	18.2
Total pitch need (2022/23 to 2039/40)	86	53

- 3.7 The consequence of the change in definition of Gypsies and Travellers introduced by the PPTS 2024, is that the deliverable supply should be calculated against the cultural need, whereas before it would have been calculated solely against the nomadic need.

4. Sources of supply

a) Sites with planning permissions

- 4.1 In accordance with national policy and guidance, sites with planning permission are considered deliverable and form part of the five year land supply position unless there is specific information that schemes will not be implemented.
- 4.2 Sites with permission at the base date of the GTAA 2023 were counted within the supply model in the study (this equated to 24 pitches which had planning permission).

All of these have either been implemented or remain live at the time of assessment, meaning no adjustment to assessed need is required to account for non-implementation.

- 4.3 Since the GTAA 2023 the Council has granted planning permission for three additional pitches at Dun Elms, Nelsons Lane, Hurst (application reference 241486, granted 29 August 2024). In addition, permission for a further pitch was allowed on appeal at Wind in the Willows (application reference 180072) and is considered to have been implemented. For completeness, the GTAA 2023 included one pitch at Wind in the Willows within the base supply, but the second pitch was not included within the supply model as the permission at that time was thought to have lapsed¹.
- 4.4 A total of 4 additional pitches have been granted since the GTAA base date as set out in Table 2 below.

Table 2 – Sites with planning permission at 31 March 2025					
Site	Application number	Net additional pitches	Date of Permission	Pitches Under construction	Year of Projected Delivery
Wind in the Willows, Islandstone Lane, Hurst	180072	1	01/11/19	1	2026/27
Dun Elms, Nelsons Lane, Hurst	241486	3	29/08/24	N/A	2027/28
		4			

b) Other sites considered to be deliverable through the application process

- 4.5 Whilst national policy sets out that sites with planning permission are in principle deliverable, sites without permission may also meet the test of having a realistic prospect of being delivered within 5 years.
- 4.6 As confirmed in case law, the relevant test is that the site has a realistic prospect of being delivered within 5 years. There is no need for the likelihood to be higher than realistic, such as certain or probable.

¹ It had been considered that the permission lapsed, based on the fact the additional pitch had not been delivered by 1 November 2022 which was 3 years from the grant of permission. It has now been established through a full enforcement investigation of the site and the planning history that the permission was implemented by the provision of sub-base, drainage and other operational works. It is therefore now reflected in supply.

- 4.7 At 31 March 2025, a full application at Plot 10 Highfield Park (application reference 223669) for “the proposed addition of 5 no. mobile home pitches and re-arrangement of existing pitches on plot 10 for gypsy and traveller residential use” was pending determination having been validated on 8 February 2023. The site is previously developed land within a wider mobile home site on which Gypsy and Traveller households live and the proposal was not for major development.
- 4.8 Whilst not determined, the Council’s legal team had been instructed to secure the necessary S106 to enable permission to be issued. Various extensions of time have been agreed to allow for the applicant to pay the required financial contribution to mitigate necessary impacts. Once the relevant contributions are received permission will be issued.
- 4.9 A total of 4 additional pitches can be anticipated to be delivered on sites subject to pending planning applications, as set out in Table 3 below.

Table 3 – Other sites considered deliverable at 31 March 2025					
Site	Application number	Net additional pitches	Date of Permission	Pitches Under construction	Year of Projected Delivery
Plot 10 Highfield Park	223669	4 ²	N/A	N/A	2027/28
		4			

c) Sites proposed for allocation in the emerging local plan

- 4.10 The Local Plan Update (LPU) will supersede the adopted Core Strategy and MDD local plans. The LPU Proposed Submission Plan was submitted for examination on 28 February 2025. Weight to be attributed to the emerging policy is informed by paragraph 49 of the NPPF 2024. This advises that weight can be applied according to the plan’s stage of preparation, the extent to which there are unresolved objections, and the degree of consistency with the NPPF and PPTS as relevant.

² Plot 10 is not currently restricted to occupancy to Gypsy and Traveller households. At the time the application was submitted, Plot 10 had been cleared and vacant of occupiers for at least 12 months. Previously Plot 10 contained a number of mobile homes with the number of static caravans across the plot (and wider site) often being in flux. Given the previous lawful position of the application site was one residential caravan plot (not Gypsy and Traveller), the application comprises a net increase of five units of accommodation but a net creation of 6 Gypsy and Traveller pitches. Based on previously available data from the 2017 GTAA (Plot vacant when 2023 GTAA undertaken) Plot 10 was understood to accommodate 2 Gypsy and Traveller households. On that basis, a conservative approach has been taken which assumes the net increase in terms of supply towards meeting currently assessed need is 4 households, i.e. 4 pitches.

- 4.11 The LPU Proposed Submission Plan Policy H9: ‘Gypsies and Travellers and Travelling Showpeople provision’ defines a pitch target of a minimum of 86 net additional pitches, as required by paragraph 9 of the PPTS. This is based on the GTAA 2023. In order to address this need, Policy H9 sets out individual land allocations for pitches, and pitch requirements as part of strategic development, totalling 74 pitches. These pitches are potentially capable of meeting the test of having a realistic prospect of being delivered within 5 years. This is explored later in this statement.
- 4.12 The sites proposed for allocation in Policy H9 are set out in Table 4 below and then considered in turn. For the sake of brevity, the Council considers all of the proposed allocations in Policy H9 to offer a suitable location for pitches by virtue of being proposed for allocation. All therefore satisfy this element of the definition of ‘deliverable’ at PPTS footnote 4.
- 4.13 Policy H9 attracted only 10 representations the through Proposed Submission Plan consultation. The issues raised are summarised in Appendix 15 to the Regulation 22 Consultation Statement (page 345 onwards)³. Of these:
- two explicitly expressed support for the policy and its approach to meeting needs (both from neighbouring authorities);
 - three further neighbouring authorities did not comment on soundness, but each clarified their inability to meet any unmet needs that may arise i.e. raised no objections to the policy approach;
 - two landowners / developers challenged the requirement for Gypsy and Traveller pitches to be delivered on site as part of strategic developments;
 - three respondents (a resident, local resident group, and parish council) expressed concern regarding perceived overconcentration of development in the Barkham area.

Table 4 – Sites proposed for allocation in LPU Policy H9		
Reference	Site name	Approx no. pitches
SS14.1	High Barn Farm, Commonfield Lane, Barkham	20
SS14.2	Honeysuckle Lodge, Commonfield Lane, Barkham	4
SS14.3	Woodlands Farm, Wood Lane, Barkham	15
SS14.24	Woodside, Blagrove Lane, Wokingham	4
SS11	Arborfield Green Strategic Development Location	5
SS12	South Wokingham Strategic Development Location	6
SS13	Loddon Valley Garden Village	20
		74

³ Available here: <https://www.wokingham.gov.uk/sites/wokingham/files/2025-02/Appendix%2015%20-%20Summary%20of%20main%20issues.pdf>

4.14 Each proposed allocation in Policy H9 is now considered in turn.

SS14.1 High Barn Farm, Commonfield Lane, Barkham

4.15 This site is owned by the Council and funding exists within the Council's capital programme for the provision of additional Gypsy and Traveller pitches. No technical issues were raised during the proposed submission consultation and there are no tenancy issues that would prevent delivery. The level of objection to the allocation was small, with two being received from residents.

4.16 Conclusion: the site is considered to have a realistic prospect of delivering 20 pitching in the next five years.

SS14.2 Honeysuckle Lodge, Commonfield Lane, Barkham

4.17 This site is privately owned and comprises an extension to an existing Gypsy and Traveller site. The location is considered suitable in principle. The promoter's agent confirmed via email in January 2025 that "the owners wish to retain the allocation option and would be happy to deliver it". However, no details of timing of a potential application have been provided.

4.18 No technical issues were raised during the proposed submission consultation that would prevent delivery. The level of objection to the allocation was small, with one being received from a resident.

4.19 Conclusion: whilst the site is clearly developable, the site is not considered deliverable given the absence of information regarding the timing of an application or other visible progress.

SS14.3 Woodlands Farm, Wood Lane, Barkham

4.20 Through representations to the Proposed Submission Plan, the landowner has suggested the site is no longer available for Gypsy and Traveller use and is being pursued for bricks and mortar housing instead, with a housebuilder on board.

4.21 Through the LPU process, the Council assessed the site as unsuitable for alternative forms of housing.

4.22 Conclusion: the site is not considered deliverable in the absence of clear availability for Gypsy and Traveller pitches at this time.

SS14.24 Woodside, Blagrove Lane, Wokingham

4.23 This site is privately owned and comprises an extension / intensification to an existing Gypsy and Traveller site. The location is considered suitable in principle. Council

officers have been in regular discussion with the landowner, who has indicated their intent to submit an application before the end of 2025.

- 4.24 No technical issues were raised during the proposed submission consultation that would prevent delivery, and no objections were received regarding the allocation.
- 4.25 Conclusion: the site is considered demonstrably available, suitable, and with a realistic prospect of delivery in the next five years.

SS11 Arborfield Green Strategic Development Location

- 4.26 Whilst the five pitches at Arborfield Green SDL are considered developable, it is anticipated that delivery will fall later in the plan period.
- 4.27 Conclusion: the site is not included in deliverable supply.

SS12 South Wokingham Strategic Development Location

- 4.28 Whilst the six pitches at South Wokingham SDL are considered developable, it is anticipated that delivery will fall later in the plan period.
- 4.29 Conclusion: the site is not included in deliverable supply.

SS13 Loddon Valley Garden Village

- 4.30 Whilst the 20 pitches at Loddon Valley Garden Village are considered developable, it is anticipated that delivery will fall later in the plan period. Delivery is anticipated as 10 pitches in the middle of the plan period, and a further 10 pitches later in the plan period.
- 4.31 Conclusion: the site is not included in deliverable supply.
- 4.32 On the basis of the above analysis, sites that are proposed for allocation in the emerging LPU that are considered to be deliverable are detailed in Table 5 below.

Table 5 – Emerging allocations considered deliverable at 31 March 2025		
Site	Net additional pitches allocated	Year of Projected Delivery
SS14.1 High Barn Farm, Commonfield Lane, Barkham	20	2028/29: 10 pitches 2029/30: 10 pitches
SS14.24 Woodside, Blagrove Lane, Wokingham	4	2027/28

5. The Five Year Housing Land Supply Position at 31 March 2025

- 5.1 As set out above, the PPTS requires local planning authorities to identify and update annually a five year supply of deliverable sites.
- 5.2 Details of sources of supply are set out in Tables 2, 3, and 5 above. Table 6 below sets out the council's calculation of the five year supply position at 31 March 2025.

Table 6 - Summary five year supply position at 31 March 2025	
a) Need from GTAA base date to monitoring year (April 2022 to March 2025)	21 ⁴
b) Completions April 2022 to March 2025	0
c) Surplus (+) / shortfall (-) April 2022 to March 2025	-21
d) 5 year need from GTAA April 2025 to March 2030	23 ⁵
e) 5 year monitoring requirement April 2025 to March 2030	44 ⁶
f) Annual monitoring requirement April 2025 to March 2030	8.8 ⁷
g) Deliverable supply April 2025 to March 2030	32 ⁸
h) Total deliverable housing supply in years for period April 2025 to March 2030	3.64 ⁹

⁴ The GTAA identifies a need in the first 5 year period (2022/23 – 2026/27) of 35 pitches i.e. 7 pitches a year. The need for the year 2022/23 to 2024/25 is therefore 3x7 pitches.

⁵ The GTAA identifies a need in the first 5 year period (2022/23 – 2026/27) of 35 pitches i.e. 7 pitches a year. Beyond the initial 5 year period, the need is identified as 51 pitches over the remaining 13 years (2027/28 – 2039/40). This is further broken down into periods, and for the five years 2027/28 – 2031/32 a need of 15 pitches is identified i.e. 3 pitches a year. The identified need of 27 therefore comprises 14 pitches (2x7) in the years 2025/26 – 2026/27 and 9 pitches (3x3) for the years 2027/28 – 2029/30.

⁶ The shortfall of 21 pitches at c) + 5 year need at d) of 27 pitches = 44 pitches.

⁷ 44/5 years = 8.8 pitches.

⁸ Sum of Tables 2, 3 and 5

⁹ 32/8.8 = 3.64

5.3 At 31 March 2025 the deliverable land supply for Gypsy and Traveller pitches equates to 3.64 years against the cultural need identified in the GTAA 2023.

5.4 Since the Council cannot demonstrate a supply of specific deliverable sites sufficient to provide five years' worth of sites against assessed need, the approach in paragraph 28 of the PPTS applies.

6. Sources of supply currently not assessed as deliverable at 31 March 2025

6.1 Notwithstanding the shortfall in deliverable supply, there is a pipeline of developable sites that are capable of assisting in meeting needs. For completeness, the PPTS at footnote 5 defines developable as follows:

"To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."

6.2 At 31 March 2025, an application at Land at Dun Elms, Nelsons Lane, Hurst that was before the Council. This was subsequently approved on 11 April 2025 (application reference 243193), post the 31 March 2025 monitoring period. This permission would result in a net increase of five pitches, over and above the earlier permission at the site which has been included in the supply position above.

6.3 At 31 March 2025, this application was being positively progressed by the Council's Development Management officers with firm progress made towards the grant of permission. This is demonstrated by revised parking and turning plans having been requested and received to overcome technical concerns. The proposed development under 243193 was only marginally short of being considered deliverable at 31 March 2025. The subsequent approval of this application very shortly after the monitoring period emphasises this point.

6.4 The proposed allocation Land at Honeysuckle (SS14.2) was also developable at 31 March 2025. As per the analysis in section 4, there were no technical reasons preventing the site coming forward. However, in the absence of a clear timeframe for the submission of an application to support the allocation, a conservative approach has also been taken with the site not being assessed as deliverable. Notwithstanding, there are no apparent technical reasons that would prevent the site coming forward in the next five years, providing an additional four pitches.

6.5 The proposed allocation Woodlands Farm (SS14.3) was also assessed as developable at 31 March 2025. Clarity regarding the allocation will be provided through the course of the local plan examination which is ongoing, with hearing dates expected in Autumn 2025. In the event that the examining Inspectors concur with the Council's position that the site is suitable for Gypsy and Traveller use, and not bricks and mortar

development, it is not unrealistic for the pitches to come forward within five years providing 10 of the 15 pitches.

- 6.6 If the above sites were to be considered deliverable, the boost to supply would be 19 pitches. This would raise the deliverable supply to 51 pitches in total or 5.8 years.
- 6.7 Therefore, whilst the Council's position is currently that it can demonstrate a 3.64 year supply of pitches, this is considered to represent a conservative minimum supply scenario.
- 6.8 Against the above, it should be noted that a planning permission at 23a Nine Mile Ride (reference 212274) is due to lapse on 5 August 2025. As per paragraph 4.2 above, this permission was counted within the supply model of the GTAA 2023. At the time of writing the permission remains extant and is capable of being implemented, however should the application not be implemented, need would increase by two pitches.

7. Conclusion

- 7.1 At 31 March 2025 the council can demonstrate a 3.64 year land supply for Gypsy and Traveller pitches. This position takes a conservative approach to proposed allocations in the emerging LPU.
- 7.2 Given the absence of a demonstrable five-year supply of Gypsy and Traveller pitches, the approach in paragraph 28 of the PPTS applies.
- 7.3 Since 31 March 2025, the Council has granted permission for an additional 5 pitches. These will be assessed for inclusion in future land supply assessments. In addition there is a good supply of developable sites which are capable of becoming deliverable in future assessments.