

Planning Statement

September 2026



Applicant:

Mr J Cash

Address:

Land at Duck Egg Farm,
Adj to Highfield Park,
Wokingham,
Berkshire,
RG2 9PP

Easting:476087 Northing:165939

Proposal:

The change of use of the land, to a residential caravan site consisting of 3 pitches, each comprising 1 Static caravan, 1 touring caravan, 2 vehicle parking spaces, bike and refuse storage, amenity area, boundary fencing and associated infrastructure, to be occupied by Gypsies and Travellers.



Planning Documents

Document Name	Ref (if any)	Page number
Planning Statement	PD1	
Location Plan	PD2	
Proposed Block Plan	PD3	
Refuse Plan	PD4	
Ebike Storage and Charging	PD5	
Bike Storage Plan	PD6	
Built Form Calculation Plan	PD7	
Land Contamination Report and Test Results	PD8	
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Site Description



The application site is located south of Observer Way (A327) and west of Eversley Road, situated in countryside beyond the settlement boundary, but being closely related to the settlement of Arborfield Green to the east, as can be seen in the image above, the Revised National Planning Policy Framework Policy S5 is applicable to the proposal.

The village of Arborfield Cross is located 1.02km to the north whilst Wokingham is circa 4.14km by road to the north east.

The red line application site is land adjacent to an existing and consented Gypsy and Traveller site, the planning history for which is set out in the relevant section.

The Chilterns National Landscape is located 12.6km north west, as the crow flies at its nearest point, and is not considered to be a relevant or material planning consideration.

The nearest SPA is 2.69km south of the site, measured as the crow flies.

The nearest SSSI is California Country Park, 1.64km as the crow flies, east of the site.

There are no article 4 directions, tree preservation orders, no ancient woodlands, no risks from flooding, and the site is not located within the Green Belt or a sensitive Footnote 7 landscape.

There are no known heritage constraints which affect the application proposal.

Planning History

The following planning files relate to the general area and not specifically the application site

260736 - Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access. Refused

260735 - Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access. Refused

260737 - Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access and landscaping works. Refused

260746 - Full application for the change of use of land to a gypsy and traveller site to allow the stationing of two residential caravans for occupation, with associated access and residential use. Refused

261394 - Full application for the proposed change of use of agricultural land to a residential caravan site for Gypsies and Travellers consisting of 3no. pitches each comprising 1no. static caravan, 1no. touring caravan, 1no. single-storey day room, 1no. cycle and bin storage, boundary fencing and associated landscaping. Undecided

122395 - No details found but consent for Pitches

223669 - Full application 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. Approved

221250 - Full application for 17no. gypsy/traveller pitches following re- arrangement of existing 6no. residential mobile home pitches and associated hard and soft landscaping. Withdrawn

253024 - Application for a Certificate of Lawful Existing Use for the use of land for the stationing of four caravans for residential occupation by Gypsy and Travellers. Approved

130992 - Use of land for the stationing of 16 mobile homes for residential use (retrospective application). Refused - Appeal Allowed

Applicant Occupants

The applicant family are well known family from the Irish Traveller community who have well established and longstanding ties with the area, with family members also living in and around the area.

I am able to confirm that they are all Gypsies or Travellers as defined within the Annexe B of the 2026 National Planning Policy Framework (NPPF).

NPPF Annexe 2 Glossary

Gypsies and travellers: 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.

This follows the High Court ruling in the judgement of the Lisa Smith Case No: CA-2021-001741 (Judgement submitted in full), this will be discussed further later in this document.

Personal Circumstances

At this stage of the application process it is not considered necessary to submit personal details in order to support a case of Very Special Circumstances in order to obtain planning consent within the planning balance.

That having been said, should the planning officer during their consideration of the file, deem it necessary and relevant to consider personal circumstances for a VSC case, then we would happily provide them to tilt the balance.

Alternative & Available Pitches

The applicants confirm that they have been unable to find alternative or available pitches, or for that matter, any land with greater or better potential than the application site.

In the event that the application is refused, then a roadside existence is the only alternative open to the applicant family members.

I submit Judicial Judgements which set out the principle approach to demonstrating whether an applicant has or needs to demonstrate this aspect of the application.

Document Submission Ref:PD

Waverley Borough Council Judgement Document Ref: PD19

I submit the full Judgement by the High Court Judge (former Planning Inspector) Karen Ridge Ref: QB: 2021-002721

She looked closely at the point regarding an oversupply of sites compared to GTAA numbers, at alternative consented sites and discussed them in her Judgement at Para 41 & Para 92-95.

41. The difficulties in obtaining a permanent pitch are set out by various defendants and I accept that is a particular difficulty of the Gypsy and Traveller community generally. Some defendants have contested the claimant's suggestion that pitches on the Lydia Park sites may be available. I understand these to be private sites, in the hands of individuals and it is to be expected that those individuals would want to keep any empty pitches for use by their own families. I conclude that it is unlikely that private pitches held by other unconnected individuals would be available to any of the defendants as alternative sites. That conclusion is one which Inspector Gilbert came to in the appeal at Stovolds Hill in August 2022, when dismissing the appeal, she concluded that this lack of suitable and alternative sites attracted significant weight.

92. The question of the availability of alternatives was raised by both parties. There are no available council pitches. The claimant suggests that sufficient provision of sites has been made and that there are spare pitches on Lydia Park. I accept that empty pitches on Lydia Park are in the hands of private individuals who will seek to cater for their own families. That was also the conclusion of Inspector Gilbert.

93. It is also instructive that the council officer, in refusing planning permission on the land did so on the basis that the Council could demonstrate a 5-year supply of pitches and that "the large number of pitches recently granted at Lydia Park itself, which gives the applicants options for alternative accommodation". This again points to the mindset of the local authority throughout their decision-making processes, they believed the defendants had somewhere else to go and a precarious roadside existence was not likely in the event of a final injunction.

94. Mr Beglan suggests that the onus of proof on the non-availability of alternative sites rests with the defendants. It is difficult of course to prove a negative. Other than the empty pitches on Lydia Park, the claimants are unable to point to any other available pitches. Some of the defendants have made enquiries of the claimant regarding the availability of pitches but to no avail. The defendants initially on the site moved off but subsequently moved back on to the Land when other options and the goodwill of family members and friends had been exhausted. I conclude that there are no other alternative sites available to these defendants in the event that they were required to leave the Land.

95. A roadside existence for these families, with all of its attendant difficulties would be the most likely consequence of final injunctive relief. That would lead to significant hardship for these families given their particular circumstances and healthcare needs.

This passage from the Judicial judgement as submitted, should serve to guide Council planning officers and appeal inspectors when considering GTAA unmet needs or consented sites that meet the need more accurately as taken by the Judiciary.

It is clear that the Judge understands quite rightly, that just because a site has been passed elsewhere, it does not mean that it is available or that there is no longer a need for the applicants to have a home and that roadside living would not be required.

Chapman v United Kingdom Document Ref: PD18

I submit the judgement in Chapman V United Kingdom 2001 Alternative Sites Must Be *Practical and Realistic*

The Court said that it wasn't just about whether **any sites exist**—it's about whether they're actually **available, suitable, and accessible** to the person involved.

"The availability of alternative accommodation is relevant to assessing the proportionality of the interference with Article 8 rights."

So if no **real** alternatives are available, forcing someone to leave may be **disproportionate** and unjustified.

European Court Human Rights

Article 8

Right to Private and Family Life - protects a traveller's way of life including their right to live in a mobile home or caravan and it follows that Authorities must consider the best interests of the Children in housing and family decisions

Article 14

Prohibition of Discrimination - Prevents discrimination based on ethnicity, lifestyle or age

Article 2

Right to Education - The children wish to access school and this article protects access to education

Article 3

Rights of Child - The CRC (ratified by all EU member states) defines the "best interests of the child" in **Article 3**, stating:

"In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities, or legislative bodies, the best interests of the child shall be a primary consideration."

This applies to:

- **Family Law:** Custody disputes, adoption, foster care.
- **Education:** Equal access, non-discrimination (e.g., Roma children's schooling rights).
- **Health & Welfare:** Access to healthcare, protection from neglect.
- **Immigration & Asylum:** Unaccompanied minors must receive special protection.

A Child cannot and must not be blamed or held to account for the actions or conduct of a parent and their rights should not be infringed as a result of the actions of their parents.

It is important to remind ourselves, that when one carries out the final planning balance, the Best interest of the Child attract the same weight in a positive manner, than the greatest weight applies in the negative.

The revised NPPF has introduced a number of fundamental changes to the National Policies for planning.

3. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise¹. The national decision-making policies in this Framework are a material consideration in making these decisions and should be read alongside the policies in the development plan. Planning decisions must also reflect relevant international obligations and statutory requirements, as must the preparation of development plans².

It sets out in Annexe A: Implementation the following;

Annex A: Implementation

For the purposes of decision-making

1. The policies in this Framework are material considerations which must be taken into account in decision-making from the day of its publication.
2. Development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in this Framework should be given very limited weight. The only exception to this is where they have been examined and adopted⁶⁶ or made against this Framework. Other development plan policies⁶⁷ should not be given reduced weight simply because they were adopted prior to the publication of this Framework.
3. Where a local planning authority can demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) and where the Housing Delivery Test indicates that the delivery of housing is more than 75% of the housing requirement over the previous three years, for the purposes of policy S5(1)(j), if the most up-to-date local housing need figure (calculated using the standard method set out in Annex D) is greater than the housing requirement set out in adopted development plan policies, this should not be considered as evidence of unmet need, for a period of five years from the date of the plan's adoption.

I will look at the relevant development plan policies and assess how they align or not with the National Planning Policies and see if any reduced weight should apply to those local plan policies within the overall planning balance.

4. Achieving sustainable development

The objective of the policies in this chapter is to meet development needs through sustainable patterns of development, including by maximising the potential for growth on suitable land within settlements, enabling development which will support the rural economy, rural communities and the provision of infrastructure, and limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside.

As a starting point our application site is located beyond the settlement boundary.

National decision-making policies

S3: Presumption in favour of sustainable development

1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:
 - a. Policy S4 in this Framework should be applied when considering development proposals within settlements;
 - b. Outside settlements, policy S5 should be applied; and
 - c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.
2. Where a development proposal falls partly within and partly outside a settlement, policies S4 and S5 should be applied to the relevant parts which are inside or outside of the settlement boundary (as appropriate), before coming to an overall view on the proposal.

The application proposal is to be judged upon Policy S5.

S5: Principle of development outside settlements

1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:
 - a. Development for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction and processing; engineering operations and infrastructure (including for transport, energy, water and telecommunications); roadside facilities in accordance with policy TR5; national defence and security; or which is solely for nature conservation, restoration and/or enhancement;

- b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary;
- c. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building²⁵. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces;
- d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential);
- e. Limited infilling within groups of houses;
- f. An exception site as provided for in policy HO10, or development brought forward under a Community Right to Build Order or Neighbourhood Development Order;
- g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation²⁶, provided it meets the criteria in policy HO12;
- h. Residential and mixed-use development which would:
 - i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
 - ii. Be physically well-related to the station or the settlement within which the station is located;
 - iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
 - iv. Not prejudice any proposals for long-term comprehensive development in the same location.
- i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and
- j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test²⁷), and where the development would:
 - i. Be physically well-related to an existing settlement²⁸ (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or
 - ii. Comprise major development for freight and logistics purposes which accords with policy E3.

The proposal falls to be considered as benefitting from Policy S5 g.

g. Unmet need for Gypsy and Traveller accommodation

Annexe D:

S5: Principle of development outside settlements

- g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation²⁶, provided it meets the criteria in policy HO12;

Footnote 26

²⁶ Including (but not limited to) where the relevant local planning authority cannot demonstrate a five year supply of deliverable sites as set out in policy HO3(1)(a) or (b).

The relevant part being Policy HO3 (1) (b) - Plan Making Policy

HO3: Providing land for homes

1. Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure and pitch and plot requirements for their areas over the plan period, drawing on the land availability assessment in accordance with policy PM9. This should include:
 - b. In relation to traveller sites:
 - i. A supply of specific deliverable sites for five years following the intended date of adoption of the plan (as set out in Annex D); and
 - ii. A supply of specific, developable sites or broad locations for growth for the subsequent years 6 to 10 and, where possible, for the remaining plan period, where the plan covers more than 10 years.
2. Where an allowance is to be made for windfall sites as part of the identified supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the land availability assessment, historic windfall delivery rates and expected future trends.

Five year supply of traveller sites

10. Local planning authorities should identify and update annually a supply of specific deliverable traveller sites. This should be sufficient to provide a minimum of five years' worth of pitches and plots, assessed against their pitch and plot requirement in the development plan.

What is Deliverable?

Deliverable - Judicial Judgement - East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government 2020 - High Court Consent Order.

The accepted test is: a site must be:

- available now,
- in a suitable location now, and
- achievable, with a realistic prospect that development will be delivered within five years.

Need Position Wokingham Borough Council

I submit the Councils Gypsy and Travel Topic Paper as **Document Submission Ref: PD20** where at Page 22 we can see that the Council concludes it is currently able to demonstrate a 3.78 year deliverable sites provision.

f) Annual monitoring requirement April 2024 to March 2029	8.2 ¹¹
g) Deliverable supply April 2024 to March 2029	31
h) Total deliverable housing supply in years for period April 2024 to March 2029	3.78 ¹²

- 5.4 At the point of publication of the Proposed Submission Plan the council is unable to demonstrate a 5 year supply of deliverable pitches against the locally set target in the Proposed Submission Plan, with the position standing at 3.78 years.
- 5.5 However, this is due to the timing that new pitches are expected to come forward. It is anticipated that at the point of adoption of the plan, a supply in excess of 5 years will be demonstrable and that this will be maintained moving forwards. Windfall developments will be capable of topping up and ensuring supply is maintained later in the plan period.

The Councils own evidenced and published position is that it is currently unable to demonstrate an up to date 5 year supply of sites.

National Planning Policy Framework Policy S5g. Is engaged and it specifically references that compliance with Policy Ho12 in relation to sustainability is required.

I will set out the site specific sustainability credentials over the coming pages.

Policy S5 g specifically references Policy HO12

- g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation²⁶, provided it meets the criteria in policy HO12;

Delivering a sufficient supply of homes - Decision Making Policy

Policy Ho12 looks primarily at sustainability and the benefits derived from providing a settled base and access to services, this approach was previously found at Para 13 of the Policy for Traveller Sites (withdrawn)

HO12: Traveller sites

1. Development proposals for traveller sites should be located so that they:
 - a. Provide a settled base while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability and may also mean that locations not well-related to existing settlements may be appropriate; and
 - b. Enable access to frequently used services, such as education, welfare and health services, including ensuring that children can attend school on a regular basis.
2. When considering proposals for traveller sites, including for the purposes of considering need under policies S5 and GB7, local planning authorities should take into account the existing level of local provision and need for additional sites and other personal circumstances which may be relevant. Applications from any traveller should be considered and not just those with local connections.
3. Where development proposals require the permanent or temporary relocation of an authorised traveller site, an alternative site should be identified and provided. Suitable alternative sites should take into account the views of existing residents as well as existing family or community groupings where possible.

Previously when considering sustainability for Gypsy and Traveller sites, Local Planning Authorities wrestled between conventional housing standards and a relaxed approach often referred to as the 'holistic approach', to broadly align with the withdrawn Para 13 of the Planning Policy for Traveller Sites.

As a planning agency which deals predominately with applications for Gypsy and Traveller sites, we have consistently advanced cases that provide evidence on the benefits derived from a settled base which was set out at Para 13d, this as you can see has been incorporated into the revised HO12 1.(a), and so our evidential submissions and approach will follow a similar approach, this approach will also cover the second part of the HO12 Policy which looks at access to services.

When looking at sustainability under HO12, there is a critical distinction and separation from the approach taken for conventional housing and the Government make it expressly clear within their Green Belt Policy GB7 g iii, footnote 42, in reference to TR3, which I shall reason on the next page as I believe it is a critical distinction between past approaches and tis revised NPPF which seeks to deliver the Governments aims of bringing forward development and housing to meet the needs.

Difference in approach

In the former National Planning Policy Framework 2024, the Government set out an exemption to inappropriate development at Para 155, with part c of that exception, being related to sustainability.

In terms of the revised 2026 National Planning Policy Framework, the Government have labelled that same para exceptions as GB7 g. iii.

- iii. The development would be in a sustainable location, with particular reference to policy TR3 of this Framework⁴²; and

Why do I raise this point of the application site is not located within the Green belt?!

Because it references Policy TR3, being a transport policy which specifically deals with sustainability, however, you can clearly see that the Government include a footnote 42, being;

⁴² In the case of development proposals involving the provision of traveller sites, particular reference should instead be made to policy HO12.

The critical word in this footnote being 'INSTEAD', read simply, sustainability for the purposes of Traveller sites should not be considered against Policy TR3 but instead Policy HO12.

This does not mean that matters such as safe vehicle access falls to be irrelevant, far from it, as that is covered by other National Policy, TR6 (4) for example;

TR6: Assessing transport impacts

1. Development proposals that are likely to generate significant amounts of movement should be supported by:
 4. Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.

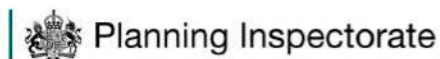
Therefore it is evident from the Governments clear direction within the National Planning Policy Framework, that they recognise that the lifestyle Gypsies and Travellers lead, with a heavier dependance upon the private motor car, and they do not require a TR3 type approach to sustainability and alternative modes of transport to access those services and facilities.

The site only needs to support a settled base and enable access to those frequently used services such as medical facilities and schooling. We shall now provide evidence of the access which is enabled by the settled base of the application site in full compliance with Policy HO12.

The information we provide here will go beyond that which is required to demonstrate compliance with policy HO12, but we consider the case officer will find it assists them with their decision making process.

I have included appeal decision which show how Inspectors have previously considered the approach to assessing sustainability of sites, however this I consider to have been under a regime with a higher threshold of compliance. The new HO12 has little no appeal decisions upon which to compare how inspectors will ultimately assess the policy in application terms.

Appeal Decisions Document Submission Ref: PD21



Appeal Decision

Hearing held on 22 October 2025 (in person) & 23 October 2025 (online)

Site visit made on 22 October 2025

by Jane Smith MA MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 18th November 2025

Appeal Ref: APP/P0240/W/25/3368820

**The Plough House, 276 London Road, Biggleswade, Central Bedfordshire
SG18 9TB**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
- The appeal is made by Mr A Connors against the decision of Central Bedfordshire Council.
- The application Ref is CB/25/00305/FULL.
- The development is described as 'Demolition of 2 existing buildings and removal of pre-existing mobile home. Erection of acoustic sound barrier fence. Change of use of land for the creation of 4 Gypsy/Traveller Pitches, comprising the siting of 4 static caravans (net 3) and 4 touring caravans alongside the erection of 1 combined dormer for use by family members (Part Retrospective)'

Location

9. The site is around 2km outside Biggleswade and not within any settlement envelope defined in the Central Bedfordshire Local Plan 2021 (CBLP). Biggleswade is defined as a major service centre in the CBLP and provides an extensive range of services and facilities in and around the town centre, including primary and secondary schools, GP and dental services, and public transport to settlements further afield. There is a sizable retail park on the southern edge of the town, which is readily accessible from the A1 and provides both convenience and comparison shopping. There is also a filling station slightly closer to the appeal site, with a small convenience store.

10. The site is directly accessible only via the northbound carriageway, with access to and from the southbound carriageway being more circuitous. This major strategic route carries fast-flowing traffic and lacks pavements, bus services or dedicated cycle facilities. When the highway conditions are taken into account, travel by car is highly likely to be the norm.

11. In the CBLP, Policy SP7 sets out the general approach to windfall development outside settlement envelopes, which includes some qualified support for redevelopment of PDL. Policy BSP1 in the Biggleswade Neighbourhood Plan 2022 (BNP) directs growth predominantly towards the town centre and built-up areas. Neither policy mentions Gypsy and Traveller development, which is more specifically covered by Policy H7 of the CBLP. That sets out several criteria, which include that adequate schools, shops, healthcare, and other community facilities are within reasonable travelling distance. The supporting text states that what constitutes a reasonable travelling distance will vary in relation to location of the site and services, and the local pattern of development.

12. The Planning Policy for Traveller Sites (PPTS) does not preclude Traveller development in the countryside, but paragraph 26 states that new sites in open countryside that is away from existing settlements should be very strictly limited. The supporting text to Policy H7 similarly recognises that Gypsy and Traveller families may prefer to live in the countryside on privately owned and managed sites, while also making clear that the policy aims to direct development toward sites which are closer to existing settlements.

13. There is some tension between Policies SP7 and H7, which include different accessibility requirements. Policy SP7 supports redevelopment of PDL only where the site is, or can be made, accessible to nearby services and

facilities by sustainable modes of transport. Policies BTM1 and BPD1 of the BNP likewise require that a balanced and sustainable range of transport options is provided, proportionate to the scale and nature of the scheme and connecting to existing pedestrian or cycle infrastructure. In contrast, Policy H7 refers only to a reasonable travelling distance, with no reference to modes of transport.

14. The approach in Policy H7 is more closely aligned to the criteria in paragraph 13 of the PPTS, which defines sustainable Traveller sites for plan-making purposes in terms of providing access to school and health services from a settled base, without specifying whether that should include the ability to travel by means other than the private car. In turn, neither Policy SP7 nor the relevant policies in the BNP specifically preclude Traveller sites outside settlement boundaries, being silent in relation to that form of development.

15. The site is well connected to Biggleswade via the A1. The settlement is not visible, but it can be quickly accessed by car. As well as Plough House, there are several other developed sites strung sporadically along the A1. There are also open fields to either side of the road, and the site is in an area defined as countryside in the CBLP. Nevertheless, the roadside development and the major road itself limit the degree to which the appeal site is perceived as being in 'open countryside' or away from the settlement. The retail park on the edge of Biggleswade is very easily accessed by car and the journey is not time-consuming. The town centre is a relatively short distance beyond that, and the settlement as a whole provides the majority of services and facilities required for day to day living. While the southbound return route is slightly longer, it is not substantially more inconvenient.

16. The approach to sustainable development in the PPTS reflects the fact that those adopting a nomadic lifestyle are inherently reliant on travel by private motor vehicle, but that they require a settled base from which to access essential services. That approach continues to be articulated in the December 2024 version of the PPTS, notwithstanding the most recent changes to Annex 1.

17. The site would provide a settled base as described in the PPTS, within a reasonable travel distance of essential services, when the nature of the road network and travel time are taken into account. While paragraph 115 of the Framework requires that sustainable transport modes are prioritised, it also says that account should be taken of the type of development and its location. Therefore, the approach taken in the PPTS to the sustainable location of Gypsy and Traveller sites is more pertinent in this case.

18. The Council argues that other villages and towns would provide a better standard of accessibility and that other Gypsy and Traveller sites in the District are closer to settlements. Be that as it may, it is common ground between the parties that there are no alternative sites available to the proposed occupiers, and this appeal must be determined based on the merits of this particular location.

19. While I have considered the Lower Caldecote decision¹ highlighted by the Council, the Inspector's reasoning in that case focussed on the more limited range of services in Upper Caldecote and did not refer to the larger range of services in Biggleswade. Although the site may have had a similar relationship with the town centre, it was on the other side of the town, so did not have a similar relationship with the nearby retail park. The decision also mentions that previous appeal decisions on and near the Lower Caldecote site had taken a different view. Taking those factors into consideration, I have given the Inspector's conclusions in that case limited weight.

20. For the above reasons, I conclude that the development is suitably located having regard to relevant policies in the development plan and access to services and facilities. While it does not gain support from Policy SP7 or the relevant BNP policies, due to the level of reliance on private motor vehicles, it does accord with the locational criterion in Policy H7. Since that is the more relevant policy for Gypsy and Traveller development, the location accords with the development plan when read as a whole. It also accords with relevant criteria for sustainable Gypsy and Traveller development in the PPTS and does not conflict with the approach of exercising very strict control over new sites in open countryside and away from settlements.

This site had no alternative modes of transport available to the sites occupants and reliance was entirely on the private motorcar, with services being over 2km from the site along a busy dual carriageway with no footpaths.

Other Matters

40. The PPTS states that local planning authorities should very strictly limit new traveller site development in the open countryside that is 'away from' existing settlements or outside areas allocated in the development plan. Despite the parties seeming to agree that the appeal site is broadly in an edge of settlement location, in relation to Wickford a little way to the north, the Council later said at the Hearing that it did not accept the site as being in a sustainable location, also that it considered the site to be isolated.

41. I note that the sustainability of the location was not given as a reason for the Council issuing the notice. I set out earlier in my decision that I considered the site to be relatively near to residential properties on established plotlands. I concur with the view that the site should be regarded as being located on the edge of, rather than away from, a settlement and not in an isolated location.

42. In terms of access to services and facilities, the appellants referred to the proximity of a shop, regularly used by the site occupiers, associated with a nearby petrol filling station on the A127 road to the west. The Council did not consider that this merited weight in view of the limited range of convenience goods that would be on offer.

43. Having visited the shop, which is likely to be within reasonable walking distance for most people, it seems to me that it would be equipped to cater for a variety of day-to-day food needs. A sustainable travel option would therefore be available to a degree. I am in no doubt, however, that it would be necessary to travel to Wickford in order to access a full range of services and facilities. It would be realistic to conclude that for reasons of convenience, distance and safety during hours of darkness there would be significant reliance on the private car in order to get to and from Wickford.

44. However, the Framework acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Despite the likelihood of a very high degree of reliance on the private car, it seems to me that the length and duration of journeys necessary to access essential services and facilities **would be relatively moderate for a rural location**. There is also the potential for the **various pitch users to make shared trips**. The overall distances that would need to be travelled in order to access a range and choice of services are likely to be limited for these reasons. I consider that this weighs in favour of the conclusion that the appeal site should be regarded as in a relatively sustainable location.

The Inspector at 44 of their report, sets out the very sensible and appropriate approach to assessing the difference between urban and rural areas when it comes to answering the question of sustainable access to goods and services as well as recognising the opportunity to share trips.

It is unknown if this location had the benefit of a delivery service, but the appellants site does as evidenced, and would greatly reduce the need to use the private vehicle to access goods.

38. The Inspector in the Little Hadham case also referred to relevant national policy in the form of the National Planning Policy Framework, which although now replaced by the revised Framework still sets out that the opportunities to maximise sustainable transport will vary between urban and rural areas.

39. The Council argues that the distances to shops and services were shorter in the Little Hadham appeal. However, on the basis of the evidence before me access to such facilities by the residents of the appeal site would involve trips of a short duration. Such trips would be comparable to those undertaken by the settled population in a rural area and would render the site a suitable location from which travellers could access necessary facilities.

40. I conclude that the site is not in a location that is easily accessible by public transport, walking and cycling and hence the development fails to comply with a principle identified by Policy CS4. However, taking account of the PPTS and the Framework, which are both material considerations, I do not find that the limitations on the accessibility of shops and services in this case render the site unsuitable as a gypsy and traveller site.

For the purposes of completeness, the full report in the referenced appeal (Appeal Ref. APP/ J1915/W/ 19/3234671) (the Little Hadham appeal), is also submitted.

The report deals with sustainable location on page 3, Para 12 through 22.

Walking/Cycle Provision

Shortly Adjacent to home is designated public footpaths and cycle lanes. Road width and bending nature of the road on corners creates slower traffic and greater motorist awareness. Pedestrian sign, max 50 sign, traffic lights (Pelican Lights) urges for drivers to slow down. Different points along the road, and their associated provisions are shown below. It is clear that these facilities are in good condition and will provide safe, reliable travel for those using the route.

NorthWest Side of the site



North side of the site

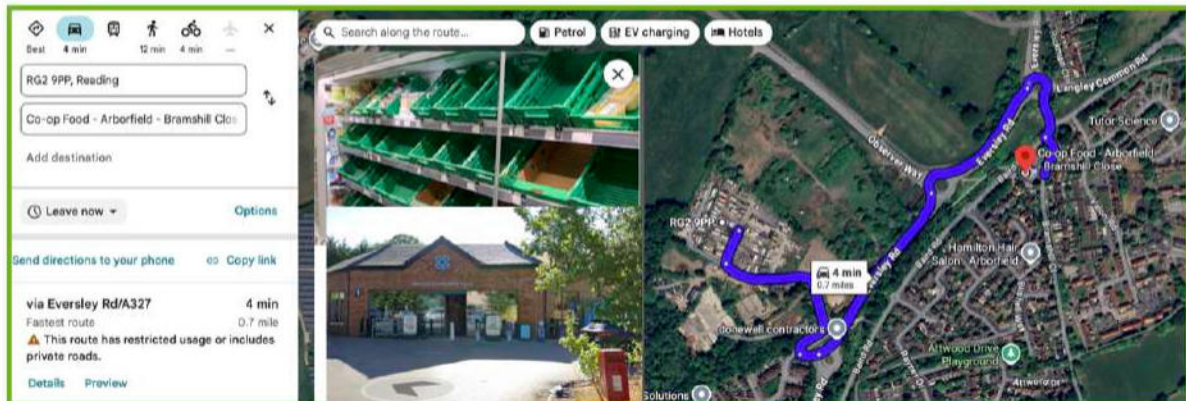


North Side of the site shows safe pedestrian access to the site and local amenity, Pelican controlled signals lights support traffic to slow down. Site is supported by many street lights which provides extra security for the occupants .

Convenience Stores

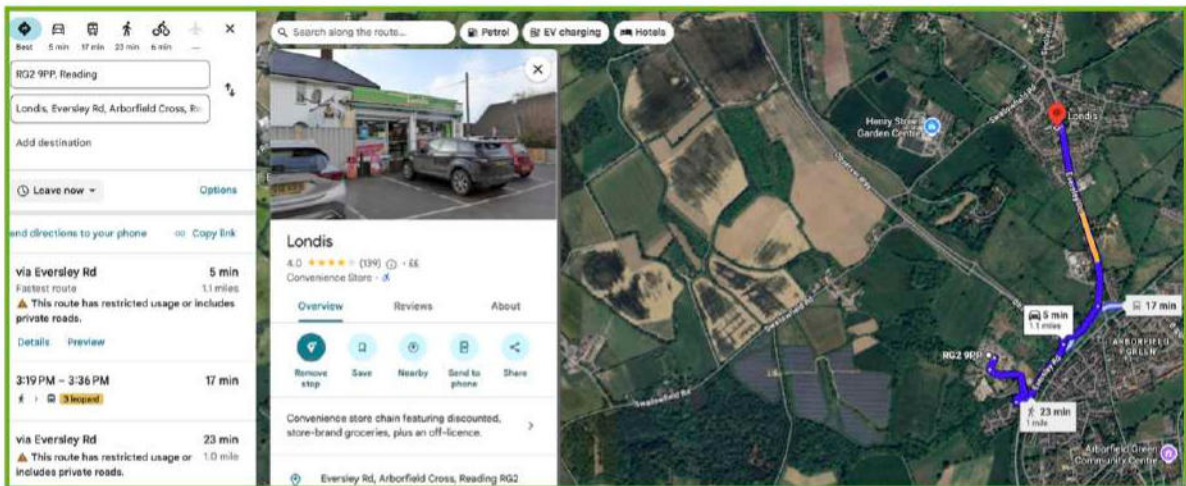
The nearest convenience store to the site is Co-op Food -Arborfield found on Bramshill Close, 27 Bramshill Cl, Arborfield, Reading RG2 9PL ;It is 0.7 miles away; a 4 minute drive/12 minutes walk/ 4 minute cycle :

This shop offers all daily essentials required - including groceries and all day to day essentials. It is open Monday - Saturday 7am - 10pm, Sundays 8am - 10pm; this ensures that access to essentials and household top-ups and pay point , these are available at any convenient hour of the day, giving the site occupant great reliability for goods and service purchase. This is home to post box .



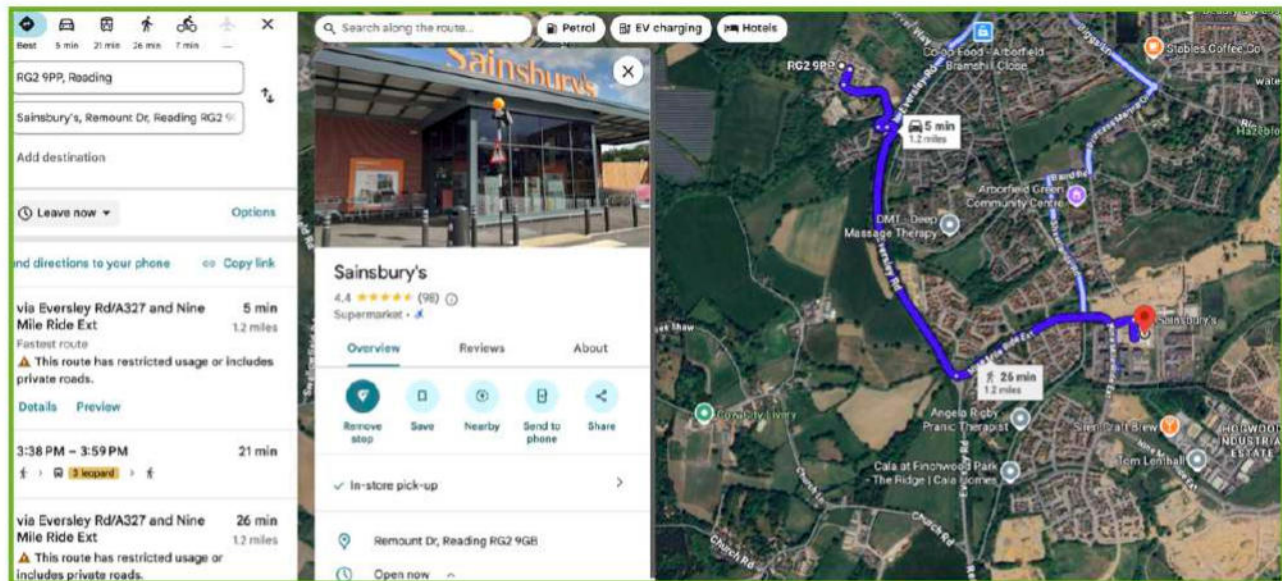
Alternative convenience Stores:

The second nearest convenience store to the site is Londis, Eversley Rd, found on Arborfield Cross, Reading RG2 9PQ , it is 1.1 miles away; a 5 minute drive/23 minute walk/6 minute cycle. This store also provides in post services and it is home to another Royal Mail post box.



Supermarket

The nearest supermarket to the site is Sainsbury's, found Remount Dr, Reading RG2 9GB
It is 1.2 miles away; 5 minute drive/11 bus route/29 minutes walk/21 mins cycle:



This shop offers all household essentials - offering a broad range of food and non-food goods for main weekly shopping needs.

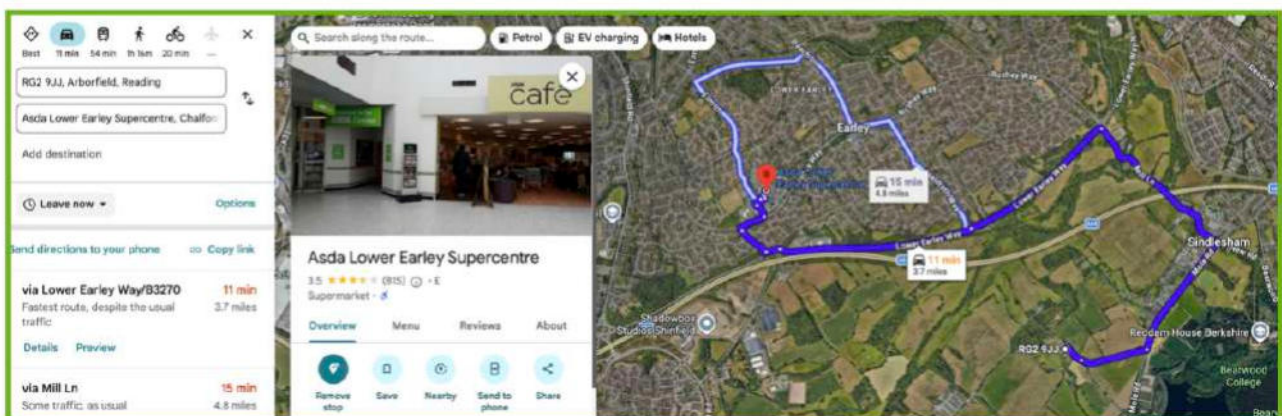
The supermarket is open Monday - Saturday 7am -11pm, Sundays 10am - 4pm - offering availability to goods at any reasonable time.

This supermarket is also accessible via bus route 6 and takes around 11 minutes.

This supermarket got petrol station available just at the entrance .

Alternative Supermarket Stores:

Below is a screenshot of nearest alternative Asda found on Lower Earley Super centre, Chalfont Way, Lower Earley, Reading RG6 5TT, its 1.2 miles, 5 minutes drive/7 minutes cycle.



Home Delivery Service

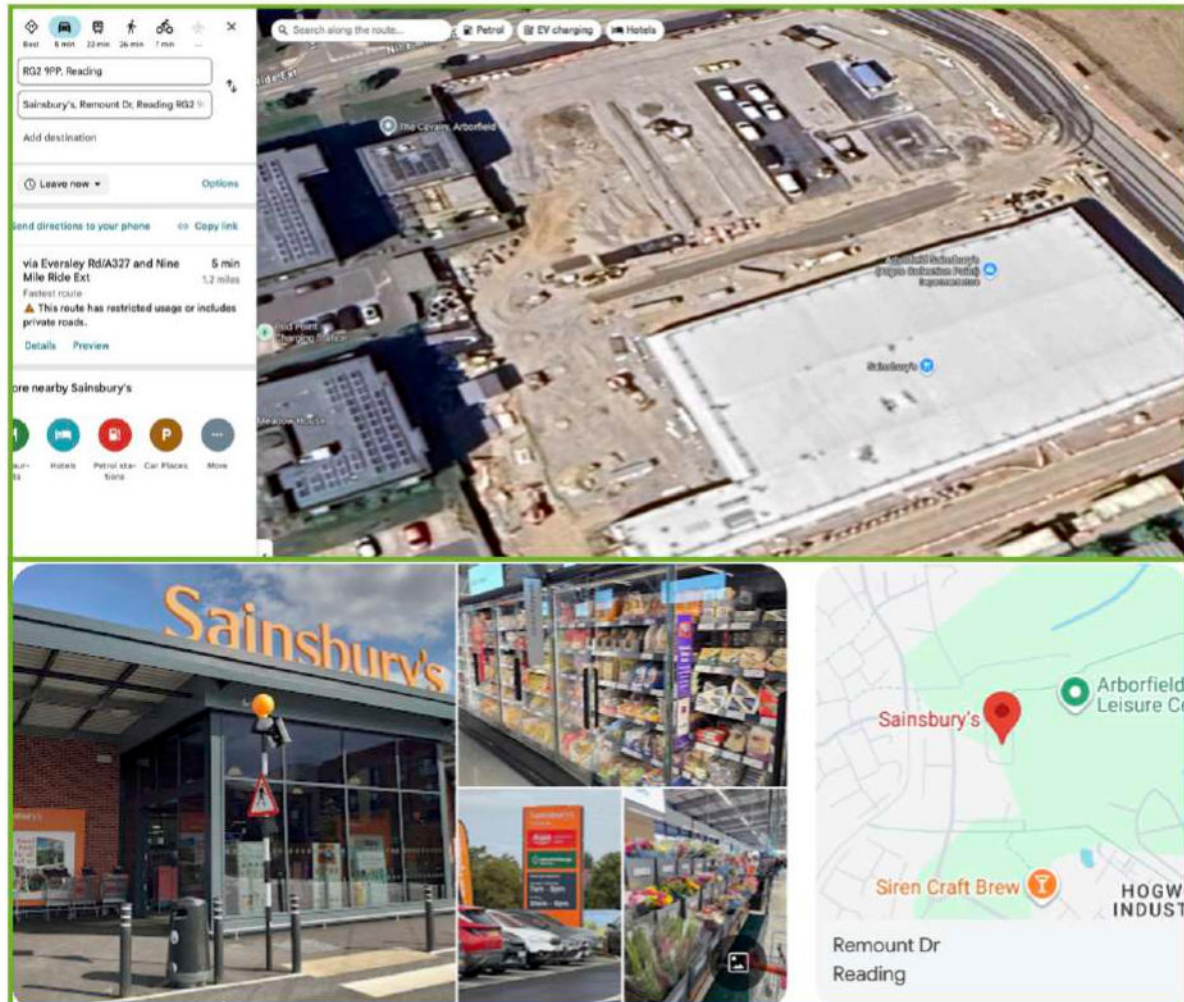
Home delivery service available from Ocado with options for 60 minutes standard slots or 4 hours saver slots.



Highfield Park - Caravan 1 Plot 21, Highfield Park, Eversley Road, Arborfield, RG2 9PP, United Kingdom							
Standard				New 4-hour			
Apr	Thu 30	Fri 01	Sat 02	Sun 03	Mon 04	Tue 05	Wed 06
Morning							
5:30-6:30am	-	-	-	-	-	-	-
6:00-7:00am	-	-	£0	£0	£0	-	£0
6:30-7:30am	-	-	£0	£0	£0	-	£0
7:00-8:00am	-	-	£0	£0	£0	-	£0
7:30-8:30am	-	-	£0	£0	£0	£0	£0
8:00-9:00am	-	£0	£0	£0	£0	£0	£0
8:30-9:30am	-	-	£0	£0	£0	£0	£0
9:00-10:00am	-	£0	£0	£0	£0	£0	£0
9:30-10:30am	-	£0	£0	£0	£0	£0	£0
10:00-11:00am	-	£0	£0	£0	£0	£0	£0
10:30-11:30am	-	£0	£0	£0	£0	£0	£0
11:00-12:00pm	£0	£0	£0	£0	£0	£0	£0
11:30-12:30pm	£0	£0	£0	£0	£0	£0	£0
Afternoon							
12:00-1:00pm	-	£0	£0	£0	£0	£0	£0
12:30-1:30pm	-	£0	£0	£0	£0	£0	£0
1:00-2:00pm	-	£0	£0	£0	£0	£0	£0
2:00-3:00pm	-	-	£0	-	£0	-	£0
3:00-4:00pm	£0	£0	£0	£0	-	£0	£0
4:00-5:00pm	-	-	£0	£0	£0	£0	£0
4:30-5:30pm	£0	-	£0	£0	£0	£0	£0
5:00-6:00pm	£0	£0	£0	£0	£0	£0	£0
5:30-6:30pm	£0	£0	£0	£0	£0	£0	£0
Evening							
6:00-7:00pm	-	£0	£0	£0	£0	£0	£0
6:30-7:30pm	£0	£0	-	£0	£0	£0	£0
7:00-8:00pm	£0	£0	£0	£0	£0	£0	£0
7:30-8:30pm	£0	£0	£0	£0	£0	£0	£0
8:00-9:00pm	£0	£0	£0	£0	£0	£0	£0
8:30-9:30pm	£0	£0	£0	£0	£0	£0	£0
9:00-10:00pm	£0	£0	£0	£0	£0	-	£0
9:30-10:30pm	£0	£0	£0	£0	£0	-	£0
10:00-11:00pm	£0	£0	-	£0	£0	-	£0
10:30-11:30pm	£0	£0	-	£0	-	-	£0
11:00-11:59pm	£0	-	-	£0	-	-	-

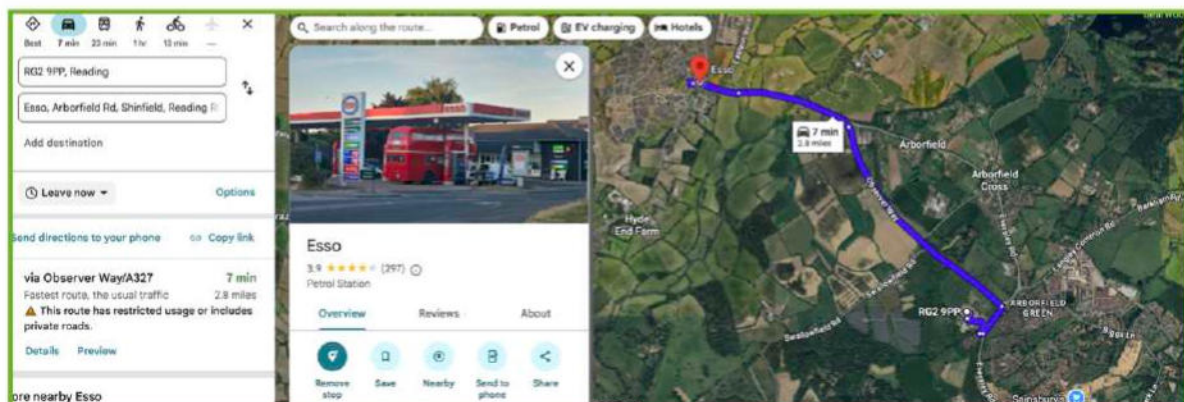
Petrol Stations

The nearest petrol station to the site is Sainsbury's, found Remount Dr, Reading RG2 9GB
It is 1.2 miles away; 5 minute drive/11 bus route/29 minutes walk/21 mins cycle:
Petrol station is open Monday to Saturday 7am - 10pm, Sunday 8am - 10pm; offering its services such another convenience store and pharmacy . This store has been recently open



Alternative petrol station

Alternative petrol station is Esso, found on Arborfield Rd, Shinfield, Reading RG2 9D

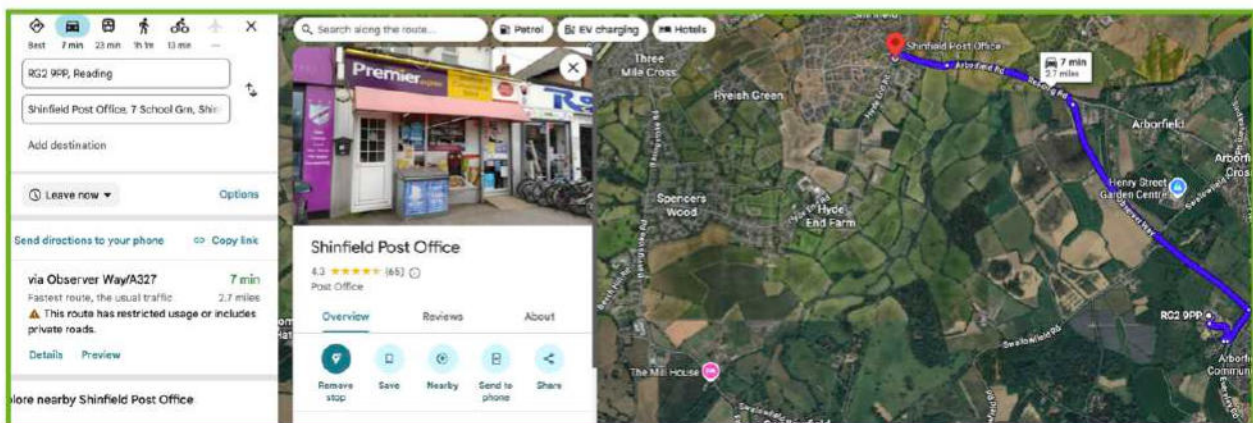


Postal Services

The nearest post box to the site, is found outside of Co-op Food -Arborfield found on Bramshill Close, 27 Bramshill Cl, Arborfield, Reading RG2 9PL ;It is 0.7 miles away; a 4 minute drive/12 minutes walk/4 minute cycle :

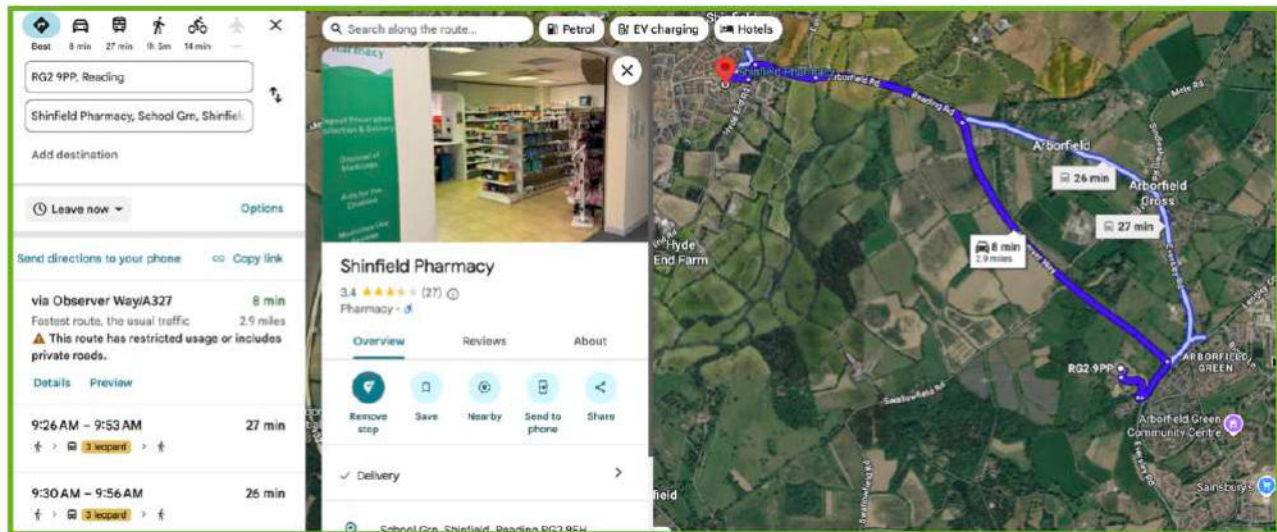


The nearest **Post Office** to the site Shinfield Post Office, found 7 School Grn, Shinfield, Reading RG2 9EE : It is 2.7 away. It is a 7 minute drive/1 minute cycle.
Post office offers bank services as well.



Pharmacy

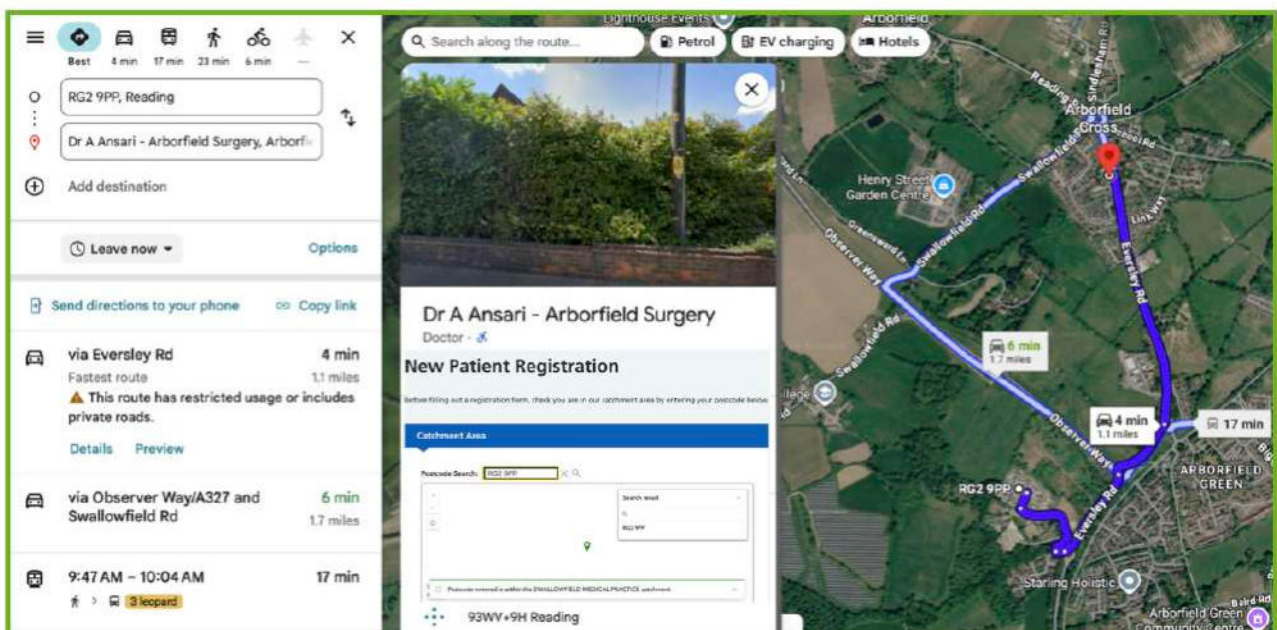
The nearest pharmacy to the site, is Shinfield Pharmacy, found on School Grn, Shinfield, Reading RG2 9EH; It is 2.9 miles away, being a 8 minute drive/27 minutes by bus /14 minutes cycle .



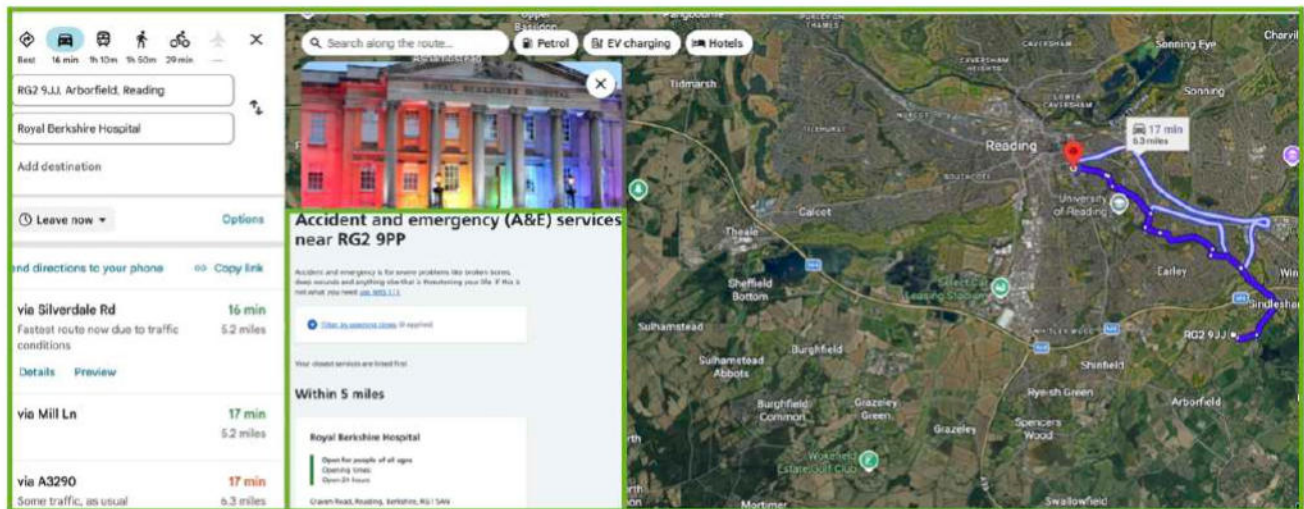
Pharmacy offers traditional pharmacy products, and allows customers to pick up prescriptions and purchase medical goods you'd expect from a traditional pharmacy, whilst also offering various advice services you would find within a Health and clinic like Blood pressure check an vaccine centre. It is open Monday to Friday 9am - 6pm with an hour close for staff lunch break between 1p-2pm giving great reliability for health and medical goods.

The nearest **GP Surgery** to the site, is Dr A Ansari - Arborfield Surgery, Arborfield Village Hall, Eversley Road, Arborfield Cross, Reading RG2 9PQ; it is 1.5 miles away, being a 6 minute drive/36 minute walk/12minute cycle.

Site occupants would need to register with Swallowfield GP Surgery and this is location where they would attend within the catchment area .



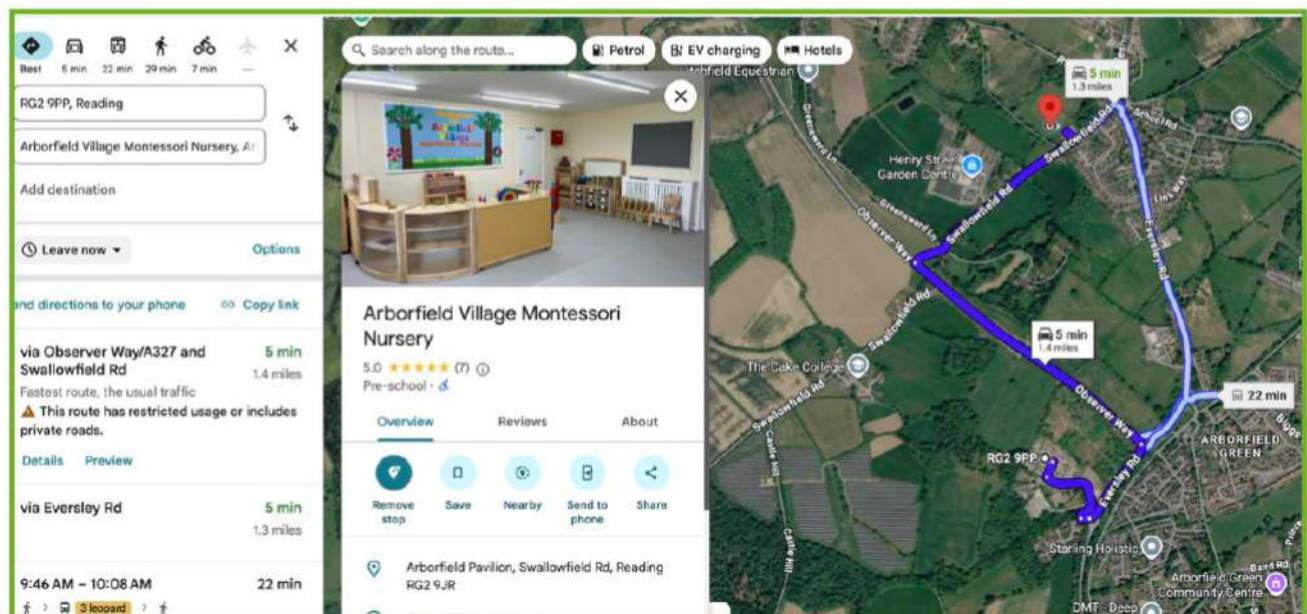
The nearest hospital, with **A&E services** is Royal Berkshire Hospital found on Craven Road, Reading, Berkshire, RG1 5AN This is typically, *according to Google Maps*, it is 5.2 miles away/16 minutes drive



Schooling/Education

A comprehensive selection of educational facilities are available for future child occupants of the site, all conveniently located in close proximity.

Arborfield Village Montessori Nursery, found on Arborfield Pavilion, Swallowfield Rd, Reading RG2 9JR ; this is 1.4 miles/5 minutes drive/29 minutes walk/7 minutes cycle.

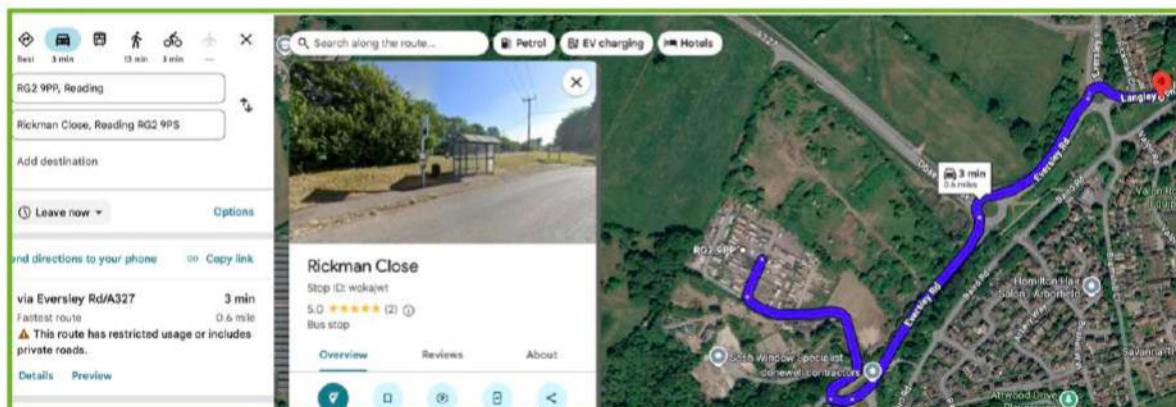


Type of Amenity	Destination	Distance from site	Drive Time	Walk Time
Nursery	Hazebrouck Day Nursery and Pre-School, The Community Centre, Sheerlands Road, Arborfield, Reading RG2 9ND	1.4 miles	5 minutes	20 minutes
Primary School	Farley Hill Primary School, Baston Rd, Reading RG2 9YW	1.0 mile	4 minutes	20 mintes
Primary school	The Coombes C Of E Primary School, School Rd, Arborfield Cross, Reading RG2 9NX	1.2 miles	5 minutes	27 minutes
Secondary School	Bohunt School Wokingham, Remount Dr, Arborfield, Reading RG2 9GB	1.2 miles	4 minutes	26 minutes
Full SEN School	Groveside School, 40 Christchurch Rd, Reading RG2 7AT	5.7 miles	16 minutes	> 1

Public Transport

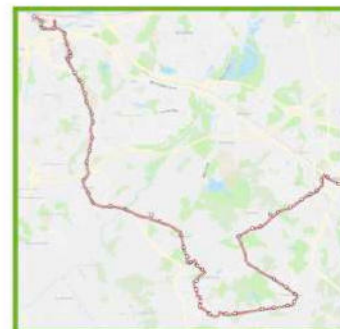
The nearest bus stop “Rickman Close” to the site is found 0.6 mile away. 3 mins drive/13minute walk/ 3 mins cycle

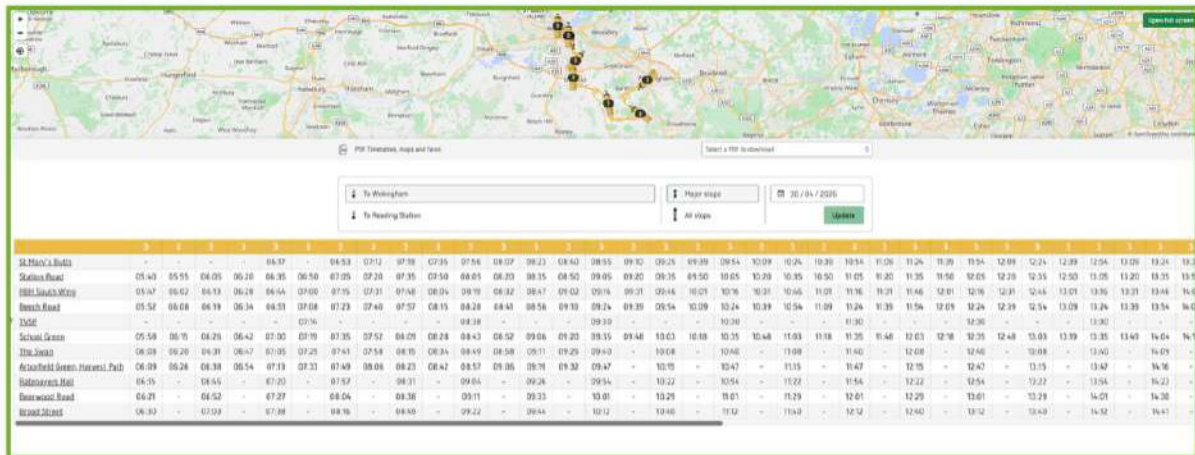
The runs on Bus Service 3 . It has direct service to Reading



Bus stops near the site

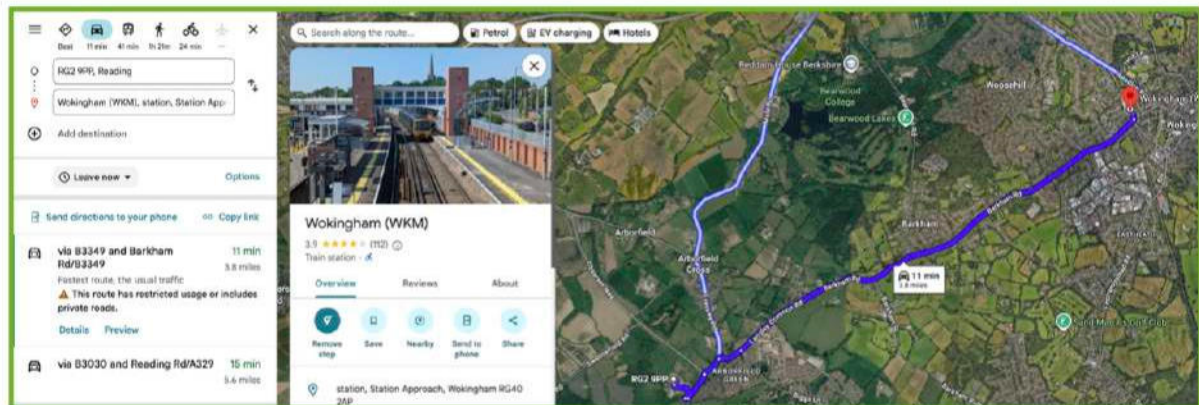
Bus route number 3





Train station

The closest train station from the site is, Wokingham (WKM), station, Station Approach, Wokingham RG40 2AP 3.8 miles away. This would otherwise be a 11 minute car journey/41 mins by bus/24 minutes cycle.



The stations home to car parking, so there is safe storage for vehicles, onward travels via public transport.
The train runs approximately every 35 minutes and it offers a direct connection either to London, Gatwick Reading and many more . Trains are run by Southern Western Rail way and Western Rail Way.

Wokingham station live train times

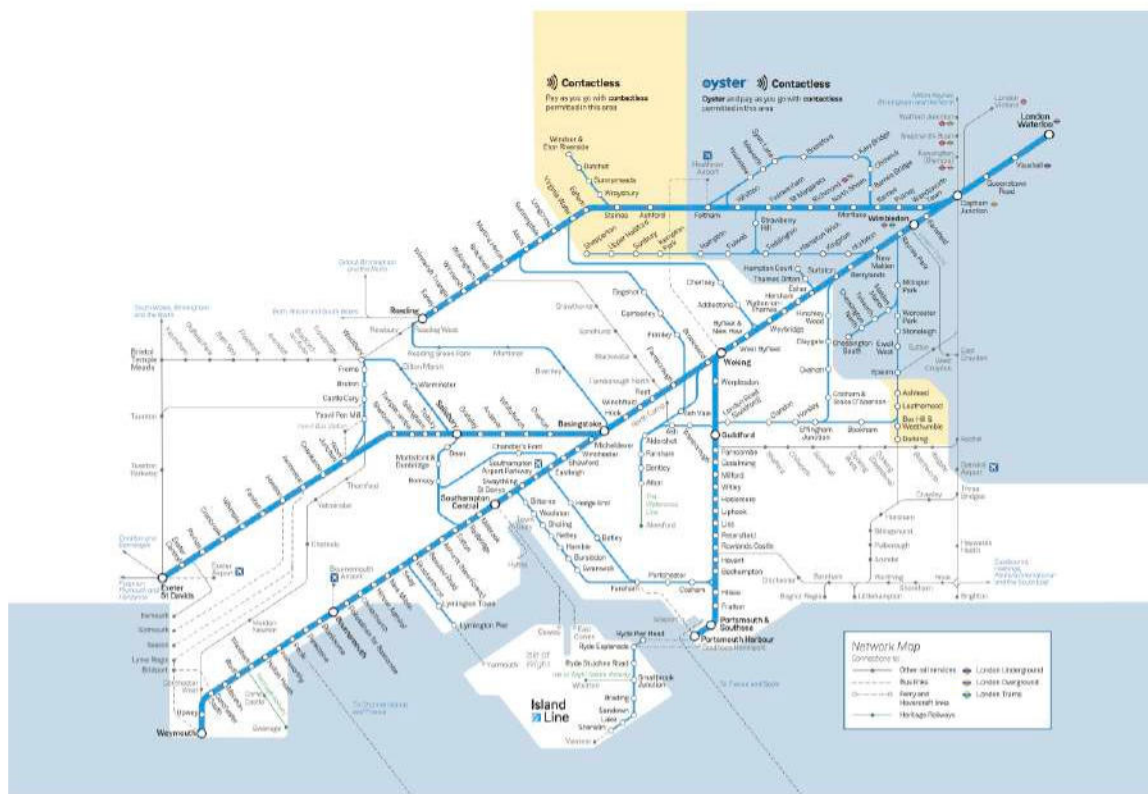
View up to two hours of live departures and arrivals status information for Wokingham station. Check train times for any future services.

Station: 12 hr 15 min

[View earlier trains](#)

Status	Depart time	Destination	Platform	Operator	
✓	13:27	Reading	2	South Western Railway	Keep me updated Refresh
✓	13:33	Gatwick Airport	1	Great Western Railway	Keep me updated Refresh
✓	13:46	Reading	2	Great Western Railway	Keep me updated Refresh
✓	13:53	London Waterloo	1	South Western Railway	Keep me updated Refresh

SWR Network map



GWR Network Map



In addition to the site being considered to be located in a sustainable location, there are additional benefits derived from Gypsy and Traveller families having a settled base.

Settled Base Benefits

There are benefits to the Local Communities and the Nation as a whole in providing travellers and Gypsies with a permanent settled base, that should be fully considered in any planning balancing exercise.

Public Interest

There is a real benefit to the public interest in bringing forward permanent and settled sites for travellers in the UK, where there is a significant shortage of sites.

The recent ruling in the in the High Court 14 May 2024, in relation to the Police Act 2022, a case brought by Wendy Smith and others, the Judge ruled that parts of the Act, were discriminatory and in breach of the European Convention of Human Rights.

The ongoing shortage of transit site provision and overall pitch provision both locally and nationally combined with the persistent hostile approach to gypsies and travellers, has ensured that Gypsy and Travellers are often left with little choice when it comes to securing homes for themselves.

Such as;

Raising education standards for children, with a low level of reading and writing being a common factor in criminal sentencing and those persons in prison. The effects of keeping people out of a life of crime and in paid employment are substantial.

It is reported by the Ministry of Justice that 57% of adults in prison in the UK have a reading level below that of an average 11 year old, with a yearly cost of £45,000 to house a single prisoner.

Access to regular mainstream education must be priority for the nation and it is widely reported that those Travellers with a settled base will ensure attendance to school for all children typically to the age of 12 and in an increasing number of cases beyond.

The screenshot shows the HMPPS website with a left-hand navigation menu and a main content area titled 'Introduction'. The navigation menu includes links to 'Contents', 'Foreword', 'Executive summary', 'Introduction', 'Context', 'Reading education is not given sufficient priority in the prison regime', 'Much education provision was not organised in a way that supports prisoners to improve their reading', 'The curriculum was not well designed to improve reading', 'Prisoners with the greatest need to improve their reading generally received the least support', 'Recommendations arising from the research', 'Methodology', 'Limitations', 'Annex A', 'Annex B', and 'Print or save to PDF'. The main content area starts with the title 'Introduction' and a sub-header 'Ofsted inspects the overall effectiveness of education, skills and work in prisons and young offender institutions (YOIs) as part of HMPPS joint inspections of prisons.' The text describes research carried out in 2008 and a recent commentary. A red box highlights a key finding: 'Prisoners have much lower levels of literacy than the general population. The most recent data published by the Ministry of Justice shows that 57% of adult prisoners taking initial assessments had literacy levels below those expected of an 11-year-old.' The text continues to discuss the impact of low reading ability on prisoners' lives and the challenges of providing education in prisons.

d probation **This article is more than 10 years old**

One in 20 prisoners of Gypsy, Romany or Traveller background, says HMIP

Proportion is 5% in English and Welsh jails but even higher in establishments holding children, such as secure training centres



Ministry of Justice figures suggest that 5% of the prison population - the proportion of inmates that identify as Gypsies, Roma or Travellers - would equate to just over 4,200 inmates. Photograph: Martin Godwin

Prisoners of Gypsy, Romany or Traveller backgrounds are significantly over-represented in jails in England and Wales, inspectors have found.

One in 20 inmates - or 5% - told Her Majesty's Inspectorate of Prisons (HMIP) that they considered themselves to be Gypsy, Romany or Traveller in 2012-13, compared with 4% the previous year.

Based on the most recent prison population figures from the Ministry of Justice, 5% would equate to just over 4,200 inmates and is similar to the total number of women in prisons.

The proportion is even higher in secure training centres (STCs), which hold young people between 12 and 18 years old, with 12% considering themselves Gypsy, Romany or Traveller. In Medway STC in Kent, this figure was 22%.

Most viewed



Swedish children to start school a year earlier in move away from play



Teachers in England offered lie-ins to make job more appealing



Campaigners call for unlimited 'climate card' UK rail pass



Agatha All Along review - the perfect show for Halloween season



Hilary Mantel was my mentor. Here are seven things she taught me about writing - and life

It is imperative and clearly in the public interest to enable regular access to education and a stable home life to traveller children to raise the average reading and literacy skills in order to provide better prospects and alternative life choices to better equipment minorities from the community to take different pathways and reduce the chances of ending up in the prison system and all the costs associated with this

Updated November 2023

Briefing: Economic and financial exclusion experienced by Gypsies and Travellers in England

Friends, Families & Travellers

Briefing: Economic and financial exclusion experienced by Gypsies and Travellers in England, April 2023

Compiled by Abbie Kirkby, Billie Dolling, John Henry Phillips, Victoria Gilmore

Key facts

- It is estimated there are 300,000 Gypsies and Travellers in the UK.
- 53% of Gypsies and Travellers who responded to the [2021 Census](#) were economically inactive^{1,2}.
- Of [2021 Census](#) respondents who identified as Gypsies and Travellers, 41% were employed, including 15% in self-employment.
- Gypsies, Roma and Travellers have the [lowest educational attainment](#), at all key stages up to and including KS4, out of any ethnic groups in the UK.
- The life expectancy of Gypsies and Travellers is [10-25 years shorter](#) than the general population.
- The [2021 Census](#) reported Gypsies and Travellers to be the ethnic groups which provided the highest levels of unpaid care of 50 hours or more.
- Gypsies and Travellers have the highest level of disability out of all ethnic groups at [16%](#), double that of the overall population.
- The [National Barometer of Prejudice and Discrimination](#) found Gypsies and Travellers to be the ethnic groups that people held the highest level of prejudice towards, compared with other protected characteristic groups.

Policy HO12 Summary

The information submitted as part of this application clearly demonstrate that the sites occupants will enjoy reasonable access to;

- a) Frequently used services, such as schooling for the children so they may attend regularly, healthcare for all, and day to day services and shops
- b) Whilst reducing the need for long distance travelling by providing a settled permanent base
- c) Whilst maintaining their cultural tradition of living in a caravan

Need

It is accepted that the LPA are unable to meet the identified needs of the Gypsy and Traveller community at present

Personal Circumstances

The applicants personal circumstances and the best interest of the Child are a determining factor that requires due consideration by the decision maker.

It is evidently plain for all, that the Government have shifted the decision-making emphasis away from does this site fit our locally defined traveller criteria, towards a simplified assessment of whether the site provides an appropriate, sustainable and properly serviced settled base having regard to the areas actual need, supply and circumstances of the applicants.

This application site has evidenced that it fulfils the policy criteria of Policy HO12.



There has been much news and publicity in recent months surrounding the tensions between Intentional Unauthorised Development caused by Travelling families moving onto land without first securing planning consent and the settled community.

This has fuelled some startling headlines and reporting by mainstream media who are doing little deescalate tensions between the settled and traveling communities.

In seeking to understand what motivates people to carry out operational development without first securing planning permission, we need to look beyond the simple narrative of blatantly disregarding the rules and laws others abide by, and look at how certain sectors of the communities are dealt with or perceived that they are dealt with.

The Government have made it a legal requirement for many years, that Councils are required to meet the housing needs of all communities, and not just those of the settled community. Sadly many Councils have failed to meet the housing needs of Gypsies and Travellers whilst meeting the needs of the settled community, as witnessed by the annual monitoring reports they are required to publish.

On top of this, many Councils take significantly longer to determine planning applications for Gypsy and Traveller sites than they do for conventional housing and a higher percentage end up in the appeals process due to the large number of objections or member call ins to committees.

The Government have responded to the adverse publicity and for the first time since releasing the ministerial statement in 2015 surrounding Intentional Unauthorised Development, they have included it within the National Planning Policy Framework at Policy DM8 (2).

It is no surprise that when a sector of society feels marginalised or excluded from the table and under represented, that they feel disengaged and are far more likely to act in a manner that runs counter to the mainstream.

I draw the Parties to Page 222/226 of PD25

8.2.5 A vicious circle

One of the main results of the weaknesses described above is to intensify public resistance to providing sites and services for Gypsies and Irish Travellers, leading to:

- greater local authority reluctance to provide suitable sites, and, therefore, to more unauthorised encampments or developments;
- fewer resources being made available for managing sites to acceptable standards, and, therefore, to run-down sites, with incidents of anti-social behaviour; and
- reluctance to provide basic services for unauthorised encampments, and, therefore, to accumulating rubbish and damage to the environment.

Each of these situations, with their negative effects on the environment, on Gypsies and Irish Travellers living on sites, and on neighbouring residents, ratchets up tensions in the community, entrenching resistance to providing any more sites or services, and culminating in pressure on local councillors not to provide services and to take a strong enforcement approach. Our recommendations below are designed to help break out of this vicious circle (*see figure 13*).

Elsewhere, authorities that are not meeting Gypsies' and Irish Travellers' need for accommodation on the same basis as for others in the community, and not dealing with the consequent damage to community relations, risk non-compliance with their legal responsibilities under the statutory general duty to promote race equality and good race relations.

Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers

Many are also failing to put their race equality schemes, and the arrangements these call for, into effect, and are therefore at risk of legal challenge, by individuals, and by the CRE itself. The statutory general duty is enforceable by way of judicial review, while the specific duties can be enforced by the CRE.

The policies and procedures of police forces in respect of unauthorised encampments, and the way they handle reports of crime on sites, suggests that their progress in meeting the duty in respect of these two ethnic minority groups is equally patchy.⁸⁴

The duty to promote race equality and good relations is not an end in itself, but a means to uncover and tackle racial inequality and poor race relations. The CRE has identified equality, participation and interaction as the three essential components of an integrated society, and we now examine our findings in the light of these.

The Government are clear in the National Planning Policy Framework, that it is no longer acceptable for a Local Planning Authority to fail to meet the need of the communities, including Gypsies and Travellers, the policies are written with a clear emphasis of delivery homes for everyone.

If you are a case officer or local resident reading this document and doubt the integrity of the data and sources of information such as the report from the Commission for Racial Equality, I would encourage you to look at the Councils own reported performance data from their annual monitoring reports and the deliverance of sites to meet the Councils obligations of providing sites to meet the identified needs.

In addition to which I shall now set out some headlines taken from recent news articles which show the type of reporting causing tensions between the communities.

Recent Headlines

UK Edition | Privacy Policy | Feedback | Follow 12.1M

Wednesday, May 27th 2026 04:27°C | 101% 27°C | 5-Day Forecast

Daily Mail News

Home | News | Royals | U.S. | Sport | Showbiz | Lifestyle | Money | Crime Desk | Games | Travel | Bigline | 90+

Latest Headlines | Business | Australia | Video | Celebrity Gossip | Deep Dive | Health News | Science | Weather



EXCLUSIVE Travellers wage bank holiday land grabs: Diggers and bulldozers spend weekend tearing up West Sussex field while trees are cut down to make way for caravans in Kent and Lincolnshire

Do YOU have a story? Email: olivia.christie@daily.co.uk
See more Daily Mail on Google - save us as a Preferred Source

By OLIVIA CHRISTIE, NEWS REPORTER
PUBLISHED: 16:10, 26 May 2026 | UPDATED: 16:10, 26 May 2026

128 shares 2.1k views

Travellers have waged a fresh series of bank holiday land grabs as diggers and bulldozers spent the weekend tearing up fields and cutting down trees while council offices were closed.

Patches of countryside in West Sussex, Kent and Lincolnshire were the latest areas to be targeted by unscrupulous developers over the three-day break - to the dismay of locals.

Work involving heavy machinery started at a site in West Chilmington, in West Sussex, on Friday, near the world-renowned English sparkling wine estate Nyetimber.

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EXCLUSIVE Traveller gangs prepare for Bank Holiday land grabs: Councils and villages on 'red alert' - as construction firm boss arranges for lorry loads of aggregate to be delivered to sites across Surrey and Sussex

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By ROY TROTT, HOME AFFAIRS CORRESPONDENT and JON AUSTIN
PUBLISHED: 05:47, 23 May 2026 | UPDATED: 10:08, 23 May 2026

321 views

At least two councils are on red alert amid fears of a fresh series of traveller 'land grabs' over the bank holiday weekend after plans emerged to move thousands of tonnes of hardcore into their areas.

Unauthorised traveller sites regularly spring up across the country over bank holidays as unscrupulous developers take advantage of council enforcement teams being off work.

Among the latest was a 12-pitch caravan site built over the May Day bank holiday weekend at Willes Green, a picturesque hamlet in Essex.

MSN
<https://www.msn.com/en-gb/travel/news/traveller-land-grabs>

Traveller gangs prepare for Bank Holiday land grabs

17 hours ago — At least two councils are on red alert amid fears of a fresh series of traveller 'land grabs' over the bank holiday weekend after plans ... [Read more](#)

BBC
<https://www.bbc.co.uk/news/articles>

Four-acre traveller site 'illegally built at weekend'

6 May 2026 — Villagers living near an alleged illegal traveller site have told the BBC its rapid construction was like a "military operation". [Read more](#)

Missing: grabbing | Show results with: [grabbing](#)

GB News
<https://www.gbnews.com/news/travellers-tear-fields-land-grabs>

Travellers spend weekend 'tearing up fields and cutting ...

7 hours ago — Carnage has ensued over the Bank Holiday as travellers spent their weekend tearing up fields and cutting down trees whilst council offices ...

Facebook · Daily Mail

20+ reactions · 2 hours ago

Travellers once again made use of the bank holiday by ...

Travellers once again made use of the bank holiday by tearing up the fields while council offices were closed.

The Telegraph

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How travellers staged a 'military-style' land grab over Easter weekend

Exploiting the four-day break to bypass council and police, a coordinated rush on rural land has left residents terrified

Malcolm Tappin, Live With News
Published: 07 April 2026
10:17pm GMT

Related Topics: Planning, Housing, Rural, Local Councils, Police



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Bank Holiday carnage as travellers spend weekend 'tearing up fields and cutting down trees' while council offices are closed

GBNEWS.COM



BACK DOWN ON ILLEGAL TRAVELLER CAMPS



This is often supported by local Councillors going on the record and taking part in interviews, sharing the type of rhetorical language which deliberately causes tension.

Billy Pither, chairman of Flamstead Parish Council, said: "They have been leaving steadily over the last week and we had drone footage of the very last caravan leaving, so there's a couple of vehicles and a container left but no occupants."



Pictured on 23 August, the site must be restored to its former state as grazing land

The borough council took **legal action against more** than 20 named respondents and "persons unknown" to stop them living on the land and developing it, after villagers spotted them moving on to the site over the Easter bank holiday weekend.

At the time, families on the site **applied for retrospective planning permission** to create a "gypsy site".

Lawyers representing the defendants argued the land should be regarded as "grey belt", not green belt, and the travellers' planning application had good prospects of success.

They also said travellers regarded their caravans as their homes and said the cultural context had to be understood.

Kennedy, who made his judgement at the Royal Courts of Justice, said there had been "flagrant" breaches of interim orders and granting a final injunction was "just and proportionate".

Pither said: "We're all amazed and astonished as it's been a tough four months, but we're chuffed to bits that we did as much as we could."

It is astonishing to me that a local Councillor would use language such as 'Chuffed to bits', when one considers that families with young Children are homeless and returned to a roadside existence.

Videos :



Travellers met by unhappy locals as they set up camp in ...

YouTube · Sky News

12 Apr 2026



How travellers staged a 'military-style' land grab in Kent's ...

YouTube · LBC

24 Jun 2026



Residents react as travellers move on to four acre field in Alfold ...

Sky News

12 Apr 2026



Residents react as travellers move onto four acre field in Alfold ...

YouTube · Sky News

12 Apr 2026

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caledonia.org.uk

<http://www.caledonia.org.uk> · land · gipsies

Gipsies demand for land-grab law sparks fury

Gipsy travellers yesterday demanded a 'right-to-buy' law to force Councils to help them buy land for camps. The move would see them gain community ownership ... [Read more](#)

Typical Facebook group posts appear



Badsey Noticeboard · [Join](#)

Anonymous participant · 4 April ·

...

This is known as a gypsy bank holiday land grab, becoming a common problem across the country. Work starts in earnest late before a long weekend, services and infrastructure are installed over the weekend and by the time the council planning is back to work on Tuesday a large number of caravans with attached services are in place. The council can then put in place an enforcement order but by then the damage is done. Then the land owner will put in retrospective planning and fight the council hoping that the council or planning inspectorate will succumb.

EXCLUSIVE

The desperate measure being taken to avoid having Travellers as neighbours

Britain is facing a wave of new Traveller encampments, but at least one community has paid tens of thousands to buy land next to their homes to avoid it housing caravans.



Lisa Holland

Communities correspondent @LisaatSky

It's a desperate measure to avoid living next to Travellers - but Sky News has learned of at least one community which clubbed together to buy land, fearing unwelcome neighbours were about to move in.

And it didn't come cheap. One resident - who chipped in £1,000 to the fund - told us their community raised more than £100,000 to purchase a field which could house dozens of Traveller caravans.

"It did feel like extortion," they told us. "But I was protecting our life and our investment."

"I was worried the value of our property might be affected if there was a Traveller site a few hundred yards up the road. It was just us buying the land in order for the village to stay the same and not be developed in a way we didn't want it to be."

"I did it for the safety and atmosphere in the village. I worried that the Travellers might bring problems and I'd worry if the kids are out walking the dog or going for a run they might run into some problem."

The person we spoke to admitted they were prejudging the Travellers, but added: "They have a reputation - some of which I'm sure isn't true - and some is. I think we were dealing with a worst-case scenario, but that was a worst-case scenario most people in the village didn't want to entertain, so we took the matter into our own hands."

The resident told us villagers bought the land off a lawyer - after he made a planning application for a structure which looked like it would pave the way for a Traveller site.

'It shows the stereotype'

John Reilly, founder of the Gypsy Traveller League, told us he believes residents buying land to avoid living next to Travellers "proves" discrimination.



John Reilly says there is a 'stigma' attached to Travellers

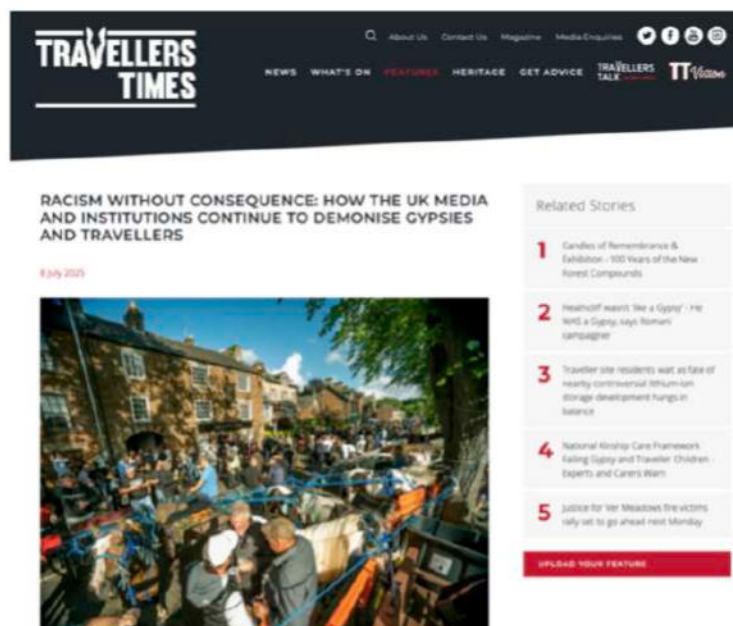
He said: "It's disgusting. We're trying to make homes and if land does come for sale that the residents are thinking straight away 'we need to purchase it in case gypsies get in'. You would not do that and turn around and say 'I don't want gay people to live here so all of us come together and buy the house'."

"It shows the stereotype - the stigma is still attached to our name. If you have a gypsy family living in your area they're not going to cause issues on their own doorstep when they live there. And if there are any issues they'll be the first ones to go and support you."

"Don't you think we're isolated enough? We want to try and move into society and work alongside local residents to build a better future for all of our kids."

Britain is facing a wave of new Traveller encampments, with Travellers buying land then moving on to it without planning permission.

The language and phrasing often associated with sensational media reporting of Gypsy and Traveller applications or where sites have been partially or fully developed prior to obtaining planning consent is often borderline racist.



In the UK today, racism against Gypsies, Roma, and Travellers (GRT) remains one of the last socially acceptable forms of prejudice. While other communities see support, progress, and protection from harmful stereotypes, the GRT population continues to be vilified—both blatantly and subtly—across mainstream media, public forums, and even police-run social media pages.

This is not simply about isolated comments or individual prejudice. This is systemic, deep-rooted, and actively harming lives.

Media Bias and Double Standards

The Daily Mail recently published a sensationalist article titled "Britain's traveller land-grabbing blitz revealed in new map." It uses inflammatory language such as "illegal camps", "land grabs", and "invasions", with no attempt to include a Traveller perspective or to address why so many families are forced to occupy land without permission in the first place. Councils routinely fail to meet their legal obligations to provide authorised sites, leaving families with no lawful place to stop.

In another example, Sky News covered the Appleby Horse Fair—Europe's largest gathering of Gypsies and Travellers—not to celebrate its cultural significance, but to criticise the aftermath of the event. The headline focused solely on rubbish left in fields, completely ignoring the thousands who attended peacefully, the centuries-old heritage of the event, or the reality that all large festivals result in clean-up operations. There is little to no mention of the Gypsy and Traveller families who stayed behind to support Billy Welch in the clean-up of Appleby, or of the significant contributions they made to the effort. In June 2023 alone, Gypsies and Travellers raised £24,000 to help fund the clean-up operation.

Compare this to the coverage of Glastonbury or Notting Hill Carnival, where litter is never weaponised against the culture of the attendees.

The message is clear: when Gypsies and Travellers gather, it's criminalised. When others do, it's celebrated.

It is evidently clear, that a chronic and very real shortage of pitches and sites to accommodate Gypsies and Travellers is causing real tensions and issues for all sectors of society, this often failure of policy and statutory requirement to supply sites must be addressed to meet everyone's needs and to ensure harmony between settled and travelling communities.

In granting planning consent for settled basis from which to travel from, we see a reduction in long term tensions between the settled and traveller community and benefits derived from less frequent long distance travelling and matters such as illegal short term roadside encampments, which attract significant media attention and bear disproportionate costs in terms of enforcement action and clear up costs.

Take this article published in the Daily Echo Newspaper in 2018 which estimated the cost of dealing with illegal roadside encampments to the taxpayer in 3 years was over £2million pounds.

dailyecho.co.uk

Daily Echo

Cleaning up after travellers cost £2m - new figures reveal



As well as that, the new fixed penalty notice for littering will rise by £20 - from £80 to £100.

Share   

15 Comments

CLEANING up traveller camps costs taxpayer £2m - but is also hitting South East farmers and landowners hard, says CLA (The Country Land and Business Association).

It's not just the taxpayer paying clean-up bills for travellers' camps, the CLA has warned - farmers and landowners are being hit hard in the pocket too.

It comes as a BBC investigation has discovered that it has cost the public purse almost £2 million in less than three years in the South. The BBC said the bill accounts for more than 1,400 illegal encampments that have been reported since 2015.

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Sustainability is more than simply being able to catch a bus within walking distance of your home to access shops, and the Government recognise this in Policy HO12 of the NPPF.

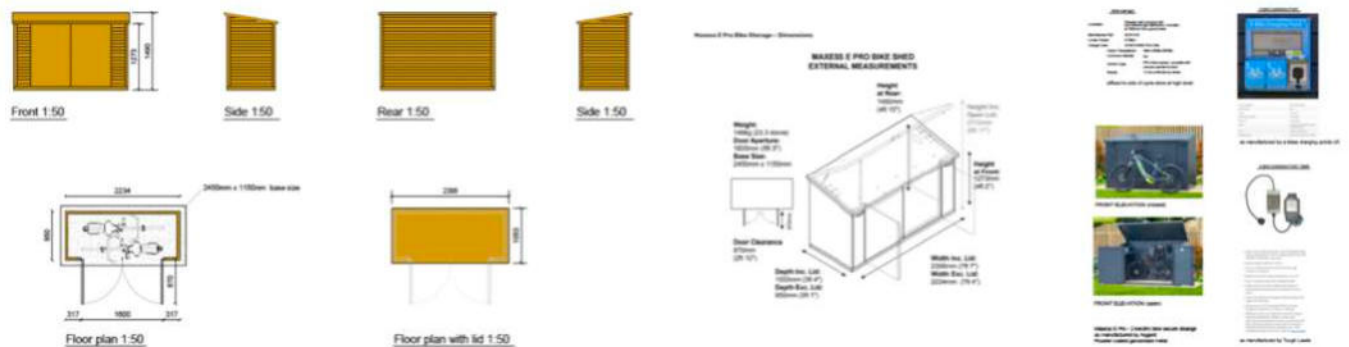
HO12: Traveller sites

1. Development proposals for traveller sites should be located so that they:
 - a. Provide a settled base while recognising the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability and may also mean that locations not well-related to existing settlements may be appropriate; and
 - b. Enable access to frequently used services, such as education, welfare and health services, including ensuring that children can attend school on a regular basis.

Cycle Store

The development proposal includes the provision and storage for Ebikes together with appropriate charging facilities.

Document Submission Ref: PD5 & PD6



Summary

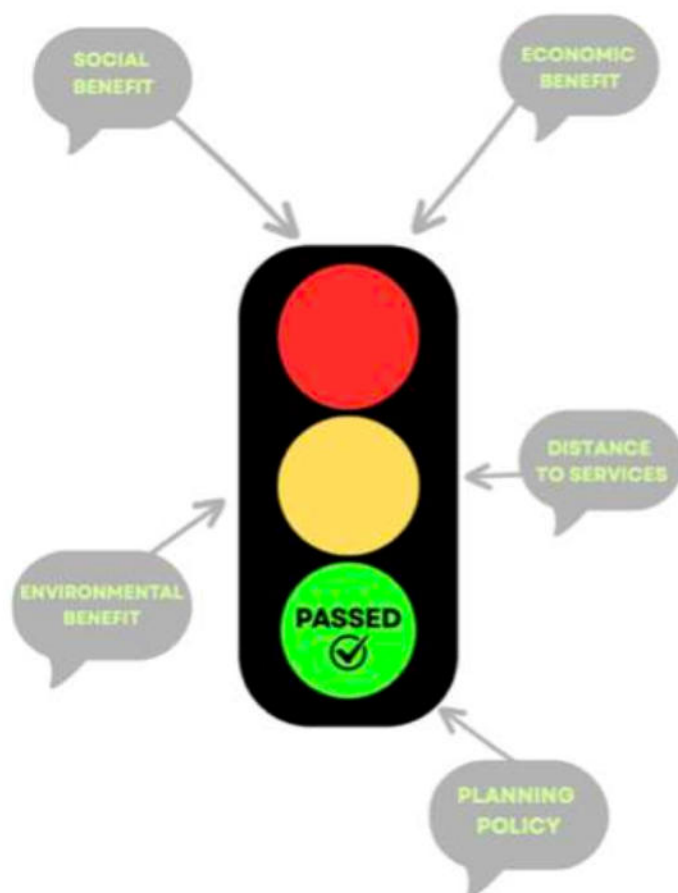
The site has excellent opportunities available to the occupants to access frequently used services, both in terms of the private motor vehicle, and alternative modes of transport, including footpaths, cycles, buses and trains.

The site fully accords with the principles of Policy HO12.

Policy HO12 - Whats not to consider

In the past, case officers have often included within their sustainability assessment, access restrictions or highway safety concerns pertaining to such matters and footpaths without lighting or unsafe site entrance safety.

Highway safety are consider under separate TR policies and do not fall to be considered under HO12.



Pathway to Approval

In reaching the planning judgement that the site accords with Policy HO12 for the purposes of assessing Policy S5 g. We are reminded at S5 1. Where it says development should be approved unless the benefits of doing so would be substantially outweighed by the adverse effects, when assessed against the national decision-making policies in this framework.

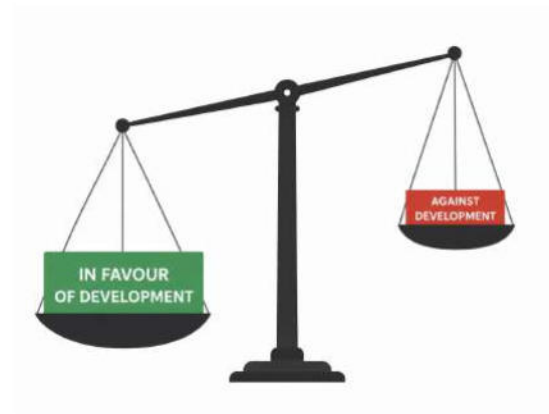
S5: Principle of development outside settlements

1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework:

Tilted Balance

The presumption in favour of sustainable development is now firmly tilted in approval of the development proposal as set out in the National Planning Policy Framework Policy S5.

It would take adverse effects amounting to the balance test of substantial to outweigh this.



Substantially Outweigh

“substantially outweighed” is a deliberately high threshold, this doesn't mean you simply count the number of harms against the number of benefits of the proposal.

It is also important to distinguish between ‘substantial weight’ and ‘substantially outweighed’, as they are not the same.

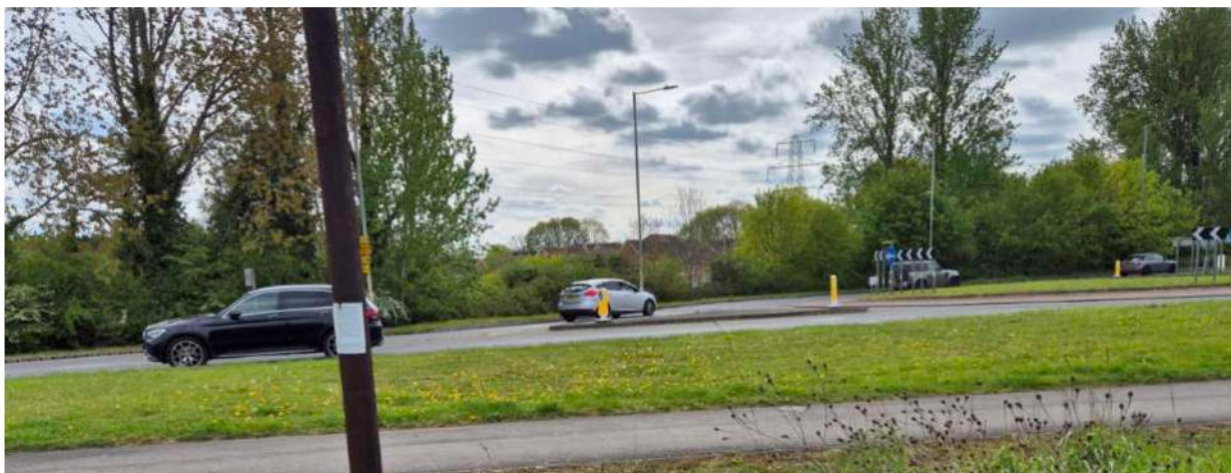
A policy requiring weight to be given substantial weight in the planing balance, such as Intentional Unauthorised development in DM8, being a restrictive policy, does not automatically disapply Policy S5.

The identified adverse harms would need to be of such significance that it engages policies of such importance, that when the adverse effects are assessed cumulatively against the benefits, the benefits are substantially outweighed.

I shall look at the remaining aspects of the proposal against the other national planning decision

The site is accessed via a private lane with passing points and sufficient width to ensure all users are safe.

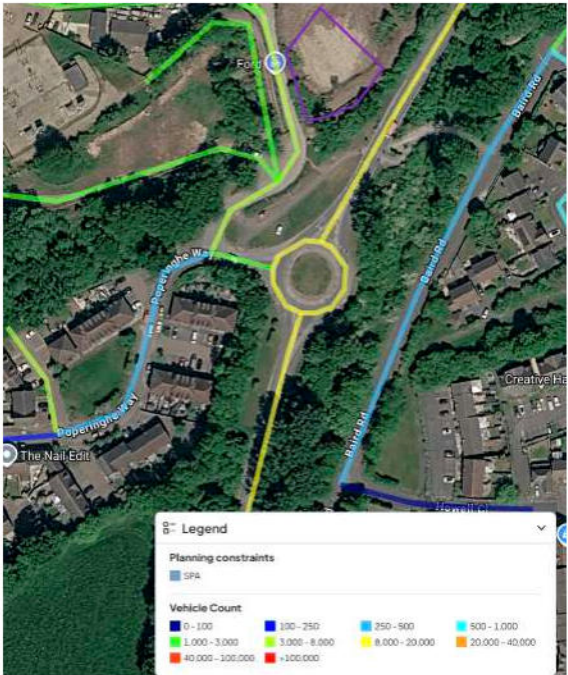
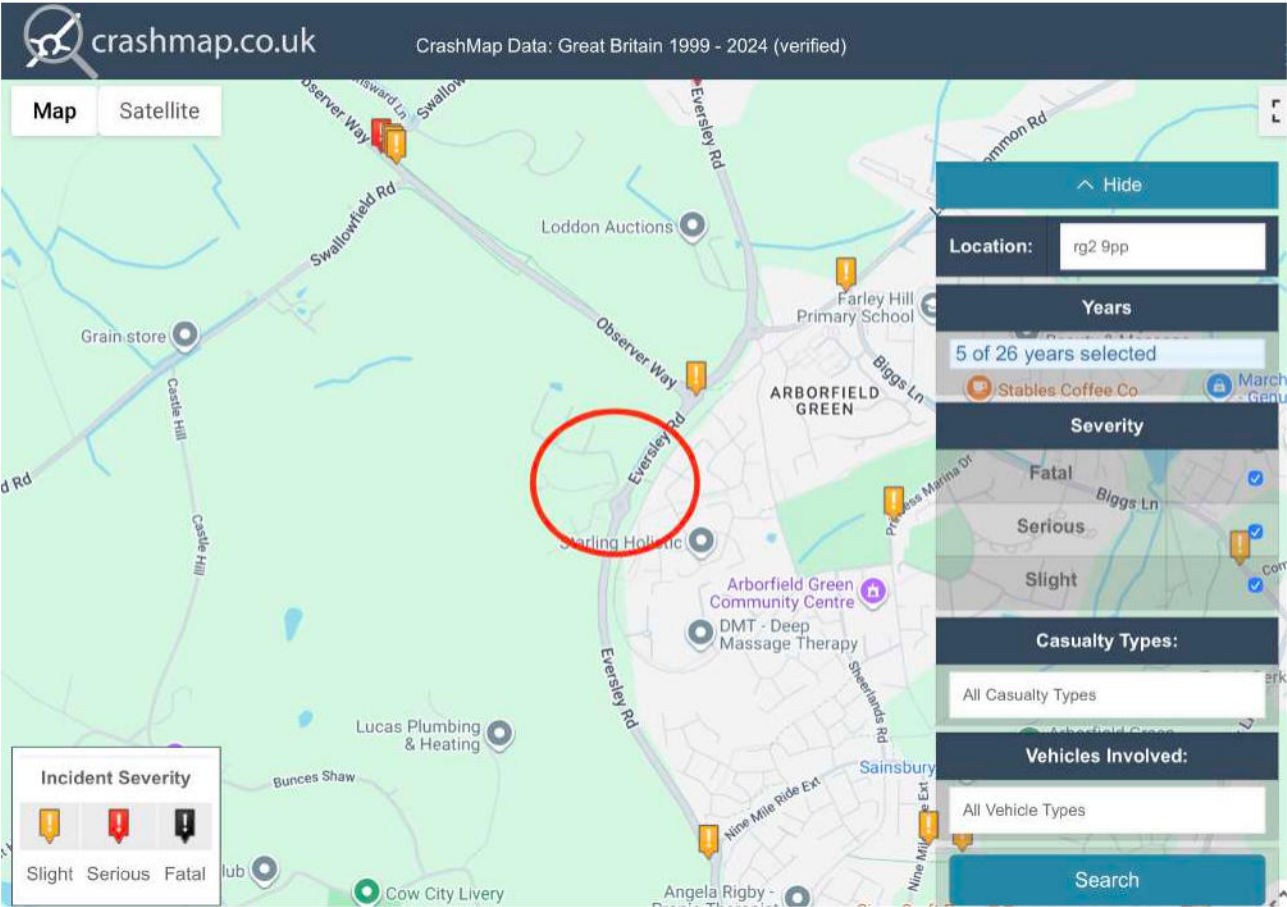
Where it meets the highway there is a roundabout and public footpath with crossings.



making policies.

Highway Access and Safety

As well as looking at the existing access arrangements to assess visibility splays and speed limits, together with suitability of surfaces and street furniture, I look at recorded crashmap data.



The recorded data set for the relevant period shows that there are no recorded incidents or accidents and there is no evidence that the highway network is operating poorly.

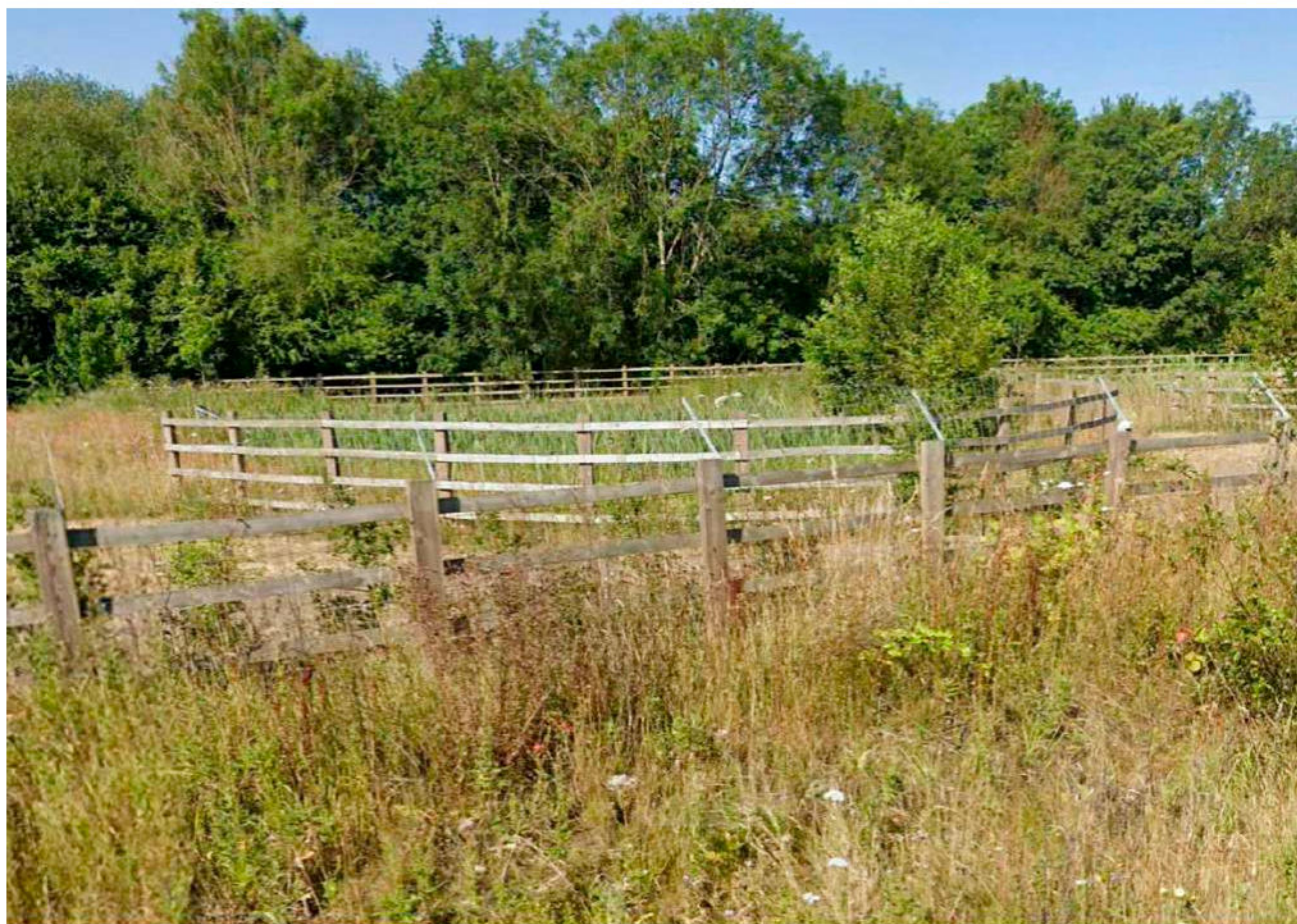
There are recorded daily trips of between 8000 and 20000 per day using this stretch of the highway network.

There are no grounds on highway safety that give rise to concern as result of the development proposal or for the occupants of the site.

Character & Appearance

The site is largely unseen from the main road and public footpaths, as can be seen in the imagery below.





The Councils Landscape Character Assessment are Submitted Ref: PD22 & PD23



It is clear that inward views of the site are not present from long or medium range, and in terms of short range inward views, they are contained to the immediate vicinity of the private access lane only.

Therefore it is considered that no detriment to the character and appearance arises as a result of the application proposal.

Landscaping

As part of this application process, the applicants are prepared to accept a planning condition to secure an enhanced landscaping scheme for approval and discharge, which will address both soft and hard landscaping.

This will ensure that matters concerning such areas as external boundary treatments can be fully considered and the best solution delivered.

I show a typical enhanced landscape plan on the next page of this statement as a guide to the officer only.

Planning Conditions

Determining development proposals

DM3: Determining development proposals

1. When considering development proposals, local planning authorities should:
 - a. Work with the applicant in a positive and proactive manner, where necessary seeking solutions to problems arising from initial proposals, to enable a timely decision;

The use of planning conditions to bring forward development is actively encouraged

- e. Consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations; and
- f. Not refuse applications for development which should clearly be approved, having regard to their accordance with the development plan, the policies in this Framework and any other material considerations.

When considering the impact of the development against the existing character and appearance of the area, it is correct to consider the imposition and benefits derived from a planning condition used to secure the submission details of external finishes and materials of the caravans.

Caravan Definition

A caravan is not defined by its physical appearance, rather a tight set of legal criteria which define it complies with the Act.

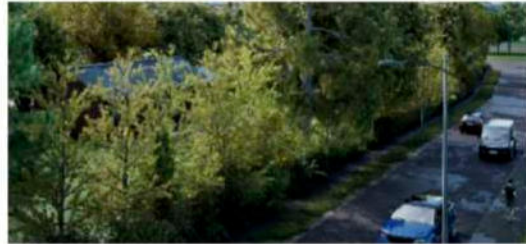
13 Twin-unit caravans.

- (1) A structure designed or adapted for human habitation which—
 - (a) is composed of not more than two sections separately constructed and designed to be assembled on a site by means of bolts, clamps or other devices; and
 - (b) is, when assembled, physically capable of being moved by road from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer),shall not be treated as not being (or as not having been) a caravan within the meaning of Part I of the **M1** Caravan Sites and Control of Development Act 1960 by reason only that it cannot lawfully be so moved on a **F1** highway **F1** road when assembled.
- (2) For the purposes of Part I of the Caravan Sites and Control of Development Act 1960, the expression "caravan" shall not include a structure designed or adapted for human habitation which falls within paragraphs (a) and (b) of the foregoing subsection if its dimensions when assembled exceed any of the following limits, namely—
 - (a) length (exclusive of any drawbar): **F2** 65.616 feet (**F3** 20 metres);
 - (b) width: **F4** 22.309 feet (**F5** 6.8 metres);
 - (c) overall height of living accommodation (measured internally from the floor at the lowest level to the ceiling at the highest level): **F6** 10.006 feet (**F7** 3.05 metres).

The Act does not prevent a caravan from achieving a high standard of design and finish to accord with discreet planning constraints in a particular area.

External Finishes

The use of regressive materials of traditional form and finishes can significantly reduce the visual impact of a caravan or caravan site in an area of often undeveloped field area beyond the settlement boudnary.



By way of an example, static caravans can be finished in numerous forms and ways, as they are defined as caravans by only a narrow set of criteria in legiulsation, I offer some examples of different caravans that meet the definition on the coming pages.



The following images all show caravans finished and styled in different ways and demonstrate the versatility available to a planning officer when considering the overall impact upon an existing character and areas appearance.





If deemed necessary and reasonable, the applicants would accept a planning condition to secure the details of external finishes and materials of the caravans.

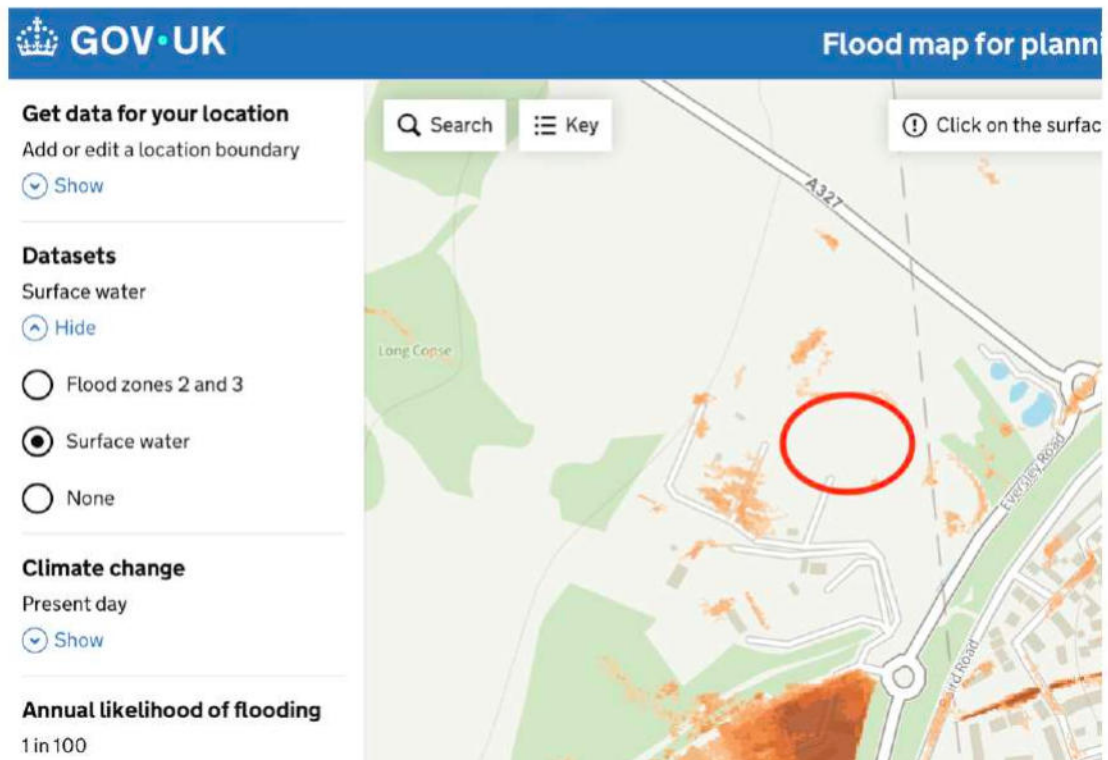
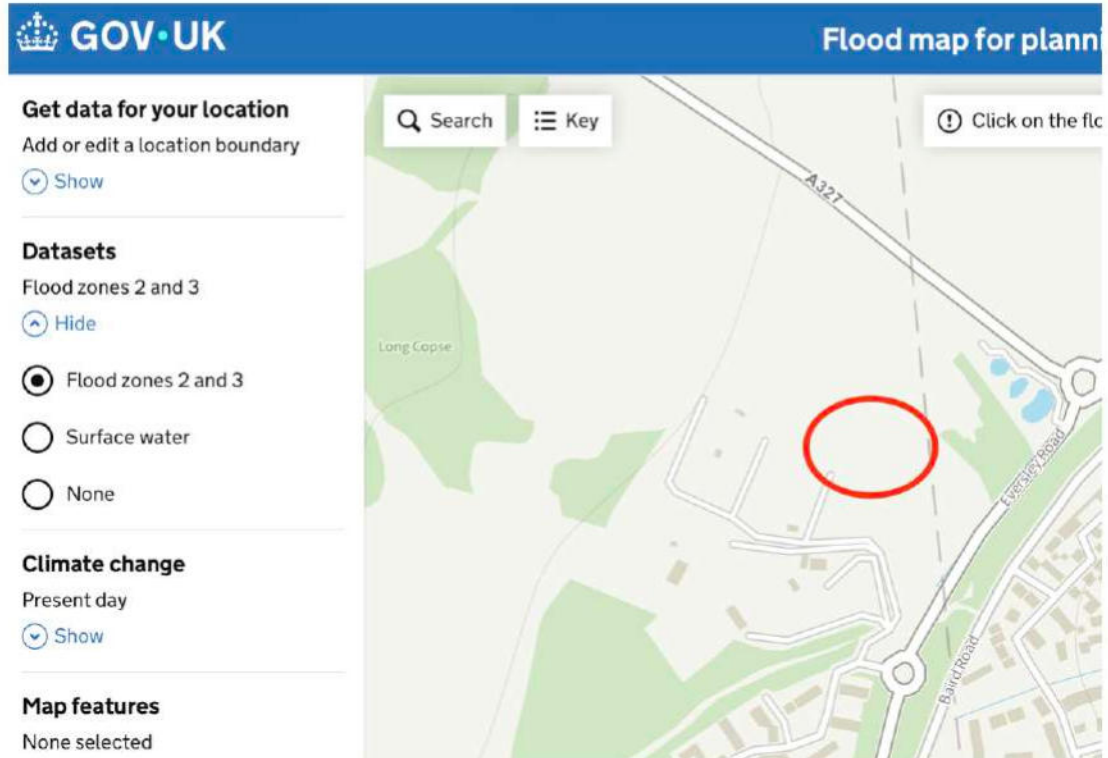
Archietectural Features



It is also possible to match caravan designs to the existing street scene and nearby built form influences such as hipped roofs as seen in these images.



A search of the Governments flood map for planning service shows the site to be wholly located within flood zone This includes surface water flooding



Flood Risk

Surface Water Drainage

The applicant intends to deal with surface water by way of SuDS, ensuring that surface water runoff is managed by mimicking natural drainage processes, slowing the flows, enhancing water quality, and promoting infiltration.

The applicants are willing and prepared to install and accept conditions for but not limited to;

- a) Permeable paving and driveways.
- b) Rainwater systems such as down pipes
- c) And all other measures to ensure

harvesting as water butts on measures to compliance

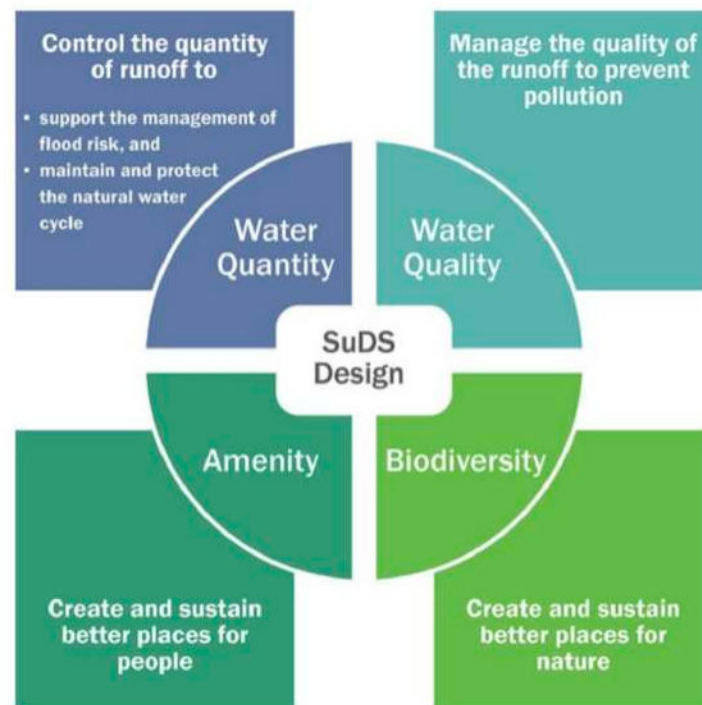


Figure 1: the four pillars of SuDS Design (CIRIA, 2015).

Foul Drainage

The applicants consider at this stage, that foul water waste will be dealt with by a package treatment plant, however, the final design and details will need to be determined following detailed ground drainage assessments and reporting and consider the reasonable and proportionate approach, is to secure this final design by planning condition to be discharged.

3.1 Sites

The ecological data received revealed Bramshill (SSSI) approximately 2.8km South of the site and Longmoor Bog (SSSI) approximately 1.8km East of the site. The application site is located within the Impact Risk Zone (IRZ) of both designated sites. However, no further consultation with Natural England is necessary.

4.2 Species

The preliminary ecological appraisal survey revealed that the habitats that have been outlined for the proposed development area contain protected species potential. The following assessment has also taken into account the adjacent habitats and connectivity to the wider landscape for all protected and rare species.

4.2.1 Amphibians (including Great Crested Newts)

Surrounding the site are five ponds of interest, and two drainage channels. None of the ponds were able to be surveyed, as these either inaccessible or within private land. Towards the N-E, there are a set of three 'balancing ponds'. These are approximately 132m, 126m and 118 N-E and measure at approximately 564m², 205m² and 195m², respectively. These are not considered suitable for GCN due to the temporary source, water quality, shade and macrophyte/ vegetation cover within. There are two other ponds, located approximately 128m and 443m West of the site, and measure at approximately 485m² and 443m², respectively. Connected woodland habitat is located to the South and West of the site. There are also refugia/ hibernacula in the form of brash and log piles and suitable foraging habitat on site, particularly in the centre.

4.2.2 Badgers

4.2.3 Bats

No potential bat roosting features were identified within the habitats surveyed on site. However, the mosaic of grassland, scrub, trees and boundary vegetation provides suitable habitat for foraging and commuting bats and has connectivity with established vegetation within the wider landscape.

The site is therefore considered to provide moderate suitability for foraging and commuting bats, although the potential for roosting bats within the site itself is considered negligible based on the features identified during the survey.

Preliminary Ecological Appraisal - Document Submission Ref: PD9

A PEA was carried out by Eco360 and the report is submitted in full.

No further surveys required

No risk or low risk no further surveys required

4.2.4 Birds

No active or disused bird nests were identified during the survey. However, substantial areas of dense scrub, scattered trees and boundary vegetation are present and provide suitable nesting habitat for a range of common bird species. There is therefore a reasonable likelihood of birds nesting within the vegetation during the breeding season, and clearance of scrub, trees or other suitable vegetation could result in disturbance or destruction of active nests. The potential impact of the proposed works upon nesting birds is considered moderate.

4.2.5 Hazel Dormouse

The site area is within hazel dormouse 'widespread population' range. The site, however, lacks a suitable woodland, scrubland mosaic to hold dormouse populations and is nearby other settlements and a main roadway. No evidence was seen during the survey.

4.2.6 Invertebrates

The combination of species-rich grassland vegetation, flowering herbs, scrub, scattered trees and deadwood provides suitable habitat for a range of common terrestrial invertebrates.

The site is therefore considered to have some value for common invertebrate assemblages. However, no specific features indicating likely presence of notable or protected invertebrate species were identified during the survey.

The potential impact upon notable or protected invertebrates is considered **low**.

A condition to secure the details of any proposed lighting scheme is appropriate

4.2.7 Reptiles

The site provides suitable habitat for reptiles through the presence of neutral grassland, areas of tall and tussocky vegetation, dense scrub, scrub margins and scattered trees. Log and brash piles provide additional potential refugia and hibernation opportunities.

The combination of open areas suitable for basking and dense vegetation providing shelter creates a structurally varied habitat mosaic suitable for species such as slow worm, common lizard and grass snake. Suitable habitat also extends into parts of the surrounding landscape.

There is therefore potential for reptiles to occur within the site and for vegetation clearance or ground disturbance to result in killing or injury if reptiles are present. The potential impact of the proposed works upon reptiles is considered moderate.

A

4.3 Potential impacts of the works

Based upon the results from the desktop survey, field survey and using a degree of academic supposition, the uncompensated development impacts have been summarised as follows:

- Amphibians – **Moderate**
- Badgers – **Low**
- Bats – **Low**
- Birds – **Moderate**
- Flora – **Low**
- Hazel Dormouse – **Negligible**
- Invertebrates – **Low**
- Reptiles – **Moderate**
- Water Voles – **Negligible**
- White-clawed crayfish – **Negligible**

planning condition to secure nesting boxes for all species is acceptable

No further works required



Biodiversity Net Gain Report

3. Baseline Calculation and Proposal Impact

3.1 Baseline Habitats

Baseline habitats were assessed using field and desktop survey findings and outlined below.

Habitat Type	Area (m ²)	Distinctiveness		Condition		Total Habitat Units	Baseline Area Retained	Baseline Area Enhanced	Area Lost	Units Lost
		Distinctiveness Score	Distinctiveness	Condition Score	Condition					
Bare Ground	685	Low	2	Moderate	2	0.27	0	0	685	0.27
Mixed Scrub	550	Medium	4	Moderate	2	0.44	500	0	50	0.04
Other Neutral Grassland	1800	Medium	4	Moderate	2	1.44	100	0	1700	1.36
Individual Trees	325.56	Medium	4	Moderate	2	0.30	0	0	325.56	0.30

Linear Habitats

Habitat Type	Length (m)	Distinctiveness		Condition		Total Habitat Units	Baseline Length Retained	Length Lost	Units Lost
		Distinctiveness Score	Distinctiveness	Condition Score	Condition				
Line of Trees	15	Medium	4	Moderate	2	0.06	15	0	0.00

3.2 Proposed Habitats

Habitats

Habitat Type	Area (m ²)	Target Distinctiveness	Score	Target Condition	Score	Habitat Units Delivered
Individual Trees	529.03	Medium	4	Moderate	2	0.19
Modified Grassland	750	Low	2	Moderate	2	0.26
Developed land; sealed surface	1000	V. low	0	N/A - Other	0	0.00
Artificial Unvegetated, Unsealed Surface	685	V.Low	0	N/A - Other	0	0.00

Linear Habitats

Habitat Type	Length (m)	Target Distinctiveness	Score	Target Condition	Score	Habitat Units Delivered
Native Hedgerow	110	Low	2	Moderate	2	0.42

3.3 Total Net Unit Change

The Net Unit change for area habitats on-site is calculated at **–1.53 units**, which correlates to a **–62.25% loss** in habitat biodiversity. This is due to the re-development of previous neutral grassland, small trees and scrub habitat. The previous bare ground access track will also be re-developed to artificial unvegetated surface.

The Net Unit change for linear habitats is **+0.42 units**, which correlates to an **–705.73% reduction** in hedgerow units.

No further works are required

4 Recommendations

4.1 Unit Deficit

The development proposals do not currently meet the recommended 10% net gain in biodiversity units. The initial score, without enhancements, resulted in a **-1.53 loss** in area habitat units (-62.25%) and **+0.42 gain** in linear habitat units (+705.73%).

To achieve the required 10% Biodiversity Net Gain from the development, the following habitat units are needed:

- **1.77 area habitat units.**
- To comply with trading rules, the above value must secure **1.36** units of 'same broad habitat or greater distinctiveness' for the medium distinctiveness grassland and **0.04** habitat units of same broad habitat or greater distinctiveness' for the medium distinctiveness heathland and shrub.

This loss of habitat is not currently compensated with habitats of equal or greater distinctiveness under submitted site plans, meaning the proposal does not meet trading rules.

4.2 Recommendations

Off-site units

Due the lack of suitable area left over and land use proposed from the development, it would not be possible to achieve BNG targets on site. Off site units must therefore be sought after.

The development has the following options:

Option 1: Consult the private market to purchase off-site biodiversity units. This should ideally be within the same LPA area or National Character Area to maximise the points gained.

Option 2: Acquire additional land off-site to use for biodiversity offsetting and habitat creation. This should ideally be within the same LPA area or National Character Area to maximise the points gained. These sites may be required to be registered as a biodiversity gain site, and habitat creation/enhancements and management must be secured for at least 30 years via a suitable legal agreement such as a planning obligation (section 106) with an LPA or a conservation covenant agreement with a responsible body.

Option 3: As a last resort, the client may wish to purchase Statutory Biodiversity Credits from the government. The client will need to provide evidence that the other above options have been explored in order to purchase these credits.

A planning condition imposing precautionary working methods is appropriate.

The report summarises that off site credits will need to be purchased to satisfy the 10% BNG requirement, the applicants are prepared to accept a suitable planning condition to secure this requirement

The full reports carried out by Eco 360 are submitted with the application.

11 CONCLUSIONS

11.1.1 The site would be classified as low to negligible risk. Due to the **low** chemical concentrations identified, any excavated material at this site may pose a '**low**' hazard to ground workers as far as Health and Safety is concerned. However, we would recommend that standard Health and Safety precautions be taken with regard to ground workers at this site. These should include PPE equipment such as gloves, overalls etc. to prevent prolonged dermal contact with the soils. Welfare facilities should be made available on-site by contractors to reduce extended contact with site soils. During the construction phase, the contractor should determine whether dust suppression measures are required as these will minimize potential inhalation of dust by neighbours or ground workers

11.1.2 Imported soils should be such that it will not present a hazard to users of the garden area and comply with BS 3882 and adhere to the Contaminated Land Exposure Assessment (CLEA) guidelines on determining the suitability of topsoil.

11.1.3 Garden areas should be provided with topsoil to a thickness of not less than 100mm.

11.1.4 Any upper ground excavated during the development of the site that cannot be reused on this site should be removed off-site to an appropriate waste disposal facility.

11.1.5 Old foundations, concrete bases and similar obstructions occurring within 300mm of the finished ground surface should be removed. Construction rubbish and debris should be removed from garden and other areas around the home

Summary

The Applicants accept that they will be required to accept a planning condition to demonstrate that they have secured the appropriate bio diversity net gain credits.

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A report prepared by Jaxx Engineering Consultancy consisting of 22 pages is submitted with the application.

Five year supply of traveller sites

10. Local planning authorities should identify and update annually a supply of specific deliverable traveller sites. This should be sufficient to provide a minimum of five years' worth of pitches and plots, assessed against their pitch and plot requirement in the development plan.

Any remedial requirement or further investigations can be secured by imposing a planning condition.

Planning Conclusion and Planning Balance

The Government introduced the revised National Planning Policy Framework in August 2026 which sets out a clear direction of bringing forward development of all types to meet the needs of all communities.

The policies contained within that framework in particular Policy S5, sustainable development in the countryside together with the application specific policy HO12 support the immediate approval of this application subject to imposing suitable and necessary planning conditions.

There are no identified adverse matters or effects as a result of the development proposal, which reach the high threshold of substantially outweighing the benefits, which cannot be mitigated.

There is no intentional unauthorised development connected with this application.

The LPA are unable to demonstrate a Five year supply of traveller sites as set out at Annexe D:10

The best interests of the Children are a material consideration in support of this application.

The site is located outside of the settlement boundary in the Countryside but the site is not isolated and is well related to the settlement of Arborfield which provides good access to a range of frequently used services and enable the occupants to reduce the need for long distance travel.

The site provides a genuine opportunity for the site occupants to access alternative modes of transport and to provide a settled base from which to integrate with the settled community, whilst providing access to schooling and education for the Children.

**The application should be
approved without delay.**

Granting The Application

It is submitted that the LPA will firstly consider a permanent non personal consent as applied for, however in the event that the LPA consider and assess that there are material reasons why that should be refused, they will be asked to consider two further option as a route to giving a consent as set out below.

Option 1: Permanent Non-Personal Permission

The Council imposes by planning condition, a restriction requiring that the site be occupied only by Gypsies and Travellers that meet the Annexe definition.

Option 2: Personal Permission

The Council is unable to grant an option 1 planning consent and following the planning balancing exercise, they deem it necessary to outweigh the identified harms on a case of personal circumstances, in which case the Council will impose a condition requiring the site to only be occupied by the named applicants and their resident dependants. Full named details can be provided upon request together with any personal circumstances to assist the case officer where they have not been provided.

Option 3: Temporary Permission

In light of the applicants personal circumstances and without an evidenced alternative and available site to meet the applicants needs, the Council imposes a condition giving permissions for a specified period of 5 years, requiring restoration of the site when that period ceases.