



**Newark & Sherwood District Council**

**Matter 5:  
Gypsy and Traveller Accommodation**

**October 2024**

## Contents

<b>Issue 1 – Whether the Plan makes Adequate Provision for Accommodation for Gypsies and Travellers .....</b>	<b>2</b>
Q5.1 Is the overall requirement of 169 pitches, including 30 pitches for those who do not meet the planning definition of a Traveller, justified and robust, having particular regard to the judgement in Lisa Smith v Secretary of State for Housing, Communities and Local Government and others [2021] EWHC 1650 (Admin)? .....	2
Q5.2 Is there clear and robust evidence to justify the approach to demand from inward migration of Gypsy and Traveller households? .....	4
Q5.3 Is the approach to providing the bulk of provision in and around the Newark area and then in and around Ollerton, justified by clear evidence? .....	6
Q5.4 Policy GRT/1 refers to a new assessment of pitch requirements within 5 years of the publication of the current Gypsy and Traveller Accommodation Assessment (GTAA). That is due in early 2025. Therefore, given that short time horizon, are the pitch requirement figures justified and sufficiently robust? .....	9
Q5.5 Is the approach to provision by extending existing sites, bringing existing sites back into use and new site allocations justified and robust in terms of meeting the latest evidenced need? .....	10

## **Issue 1 – Whether the Plan makes Adequate Provision for Accommodation for Gypsies and Travellers**

**Q5.1 Is the overall requirement of 169 pitches, including 30 pitches for those who do not meet the planning definition of a Traveller, justified and robust, having particular regard to the judgement in Lisa Smith v Secretary of State for Housing, Communities and Local Government and others [2021] EWHC 1650 (Admin)?**

A: The Gypsy and Traveller Accommodation Assessment (GTAA) ([GRT1](#)) is a robust and comprehensive evidence-based assessment of the current and future need for accommodation for Travellers in Newark & Sherwood who met, or may meet, the planning definition of a Gypsy, Traveller or Travelling Showperson as set out in Annex 1 of the [Planning Policy for Traveller Sites](#) (PPTS) (2015) that was in place at the time of the assessment.

The GTAA for Newark & Sherwood identified a total need for 169 pitches for Gypsies and Travellers for the period 2019 – 2034. This comprises need from Travellers who met the 2015 PPTS planning definition of a Traveller (118 pitches); from households that did not meet the 2015 PPTS planning definition of a Traveller (30 pitches; and from undetermined households where it was not possible to complete an interview with residents (21 pitches).

Since the GTAA was published in February 2020 there have been changes made to the PPTS in December 2023 as a result of the Lisa Smith Court of Appeal Judgement in relation to the planning definition of a Traveller for planning purposes.

The Council's consultants Opinion Research Services (ORS) have carefully considered the implications of the changes to the PPTS planning definition in 2023 on the assessment of need in a GTAA; have sought legal advice on the implications; and have come to the following conclusions:

- As a result of the Lisa Smith Judgement the PPTS was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller (now referred to as 2023 PPTS) by reintroducing those who have ceased to travel permanently due to education, ill health, or old age into the definition.
- When the 2012 PPTS definition was issued the alternative planning definition in the 2004 Housing Act was also in place (now revoked by the Housing and Planning Act in 2016). This also included anyone of a nomadic habit of life or those living in a caravan. So, if households did not meet the 2012 PPTS definition it was highly likely that they would meet the Housing Act definition.
- Now that the Housing Act definition has been revoked, there will still be large numbers of households who will not meet the 2023 PPTS planning definition if they have never travelled, or if they have never travelled for work – i.e. under case law you can only have ceased to travel (either temporarily or permanently) if you have previously travelled for work or for seeking work.
- Having reviewed a number of GTAAs that have recently been completed by ORS the vast majority of those who have ceased to travel permanently who now come under the 2023 PPTS definition are old or sick, have no children now living with

them, and (unless they are living on a temporary or unauthorised site) do not generate much, if any, need. This work has concluded that on average 25% of households did not meet the 2015 PPTS definition now meet the 2023 PPTS definition, but they bring with them less than 5% of need.

- Therefore, it is the view of ORS that the changes to the PPTS in 2023 do not really change things as far as GTAA's are concerned other than the movement of a small number of households who will now meet the 2023 definition and the movement of a very small proportion of need, if any.

As a result of the changes to the PPTS definition in 2023 ORS have reviewed the outcomes of the household interviews that were completed to support the Newark & Sherwood GTAA.

The GTAA sets out in Figure 6 that there were 45 households who were interviewed that did not meet the 2015 PPTS planning definition, and in Figures 16 and 17 that these 45 households generated a need for 30 pitches for the period to 2033/34.

The GTAA identified the following need figures for the period 2019 – 2033/34 (the GTAA period):

- Met 2015 PPTS Planning Definition = 118
- Did not meet 2015 Planning Definition = 30
- Unknown (i.e. not interviewed) = 21
- **TOTAL = 169**

The need target (as required by Paragraph 10 of the PPTS) in the Amended Allocations & Development Management DPD for the full Plan Period up to 2033/34, based on the PPTS planning definition of a Traveller would be for 131 pitches. This incorporates 62% of the overall 21 pitch need from undetermined households.

- Meet 2015 PPTS Planning Definition = 118
- Local proportion (62%) of 21 need from undetermined households = 13
- **TOTAL = 131**

Having reviewed the outcomes of the interviews for households in Newark & Sherwood that did not meet the 2015 PPTS planning definition, the implications of the changes to the PPTS definition in 2023 are:

- Total non-2015 definition households = 45
- Total non-2015 definition need to 2023/34 = 30
- Non-2015 definition households who meet 2023 definition = 16
- Need from new 2023 definition households to 2023/34 = 3
- **Adjusted total 2023 PPTS definition need to 2023/34 (131+3) = 134**

Regarding 5-year supply as required by Paragraph 10 in the PPTS the relevant period is currently from 2024/25-2028/29. Taking account of the baseline date for the GTAA need also has to be addressed for the period 2019/20-2023/24. Therefore the 5-year need target to 2028/29 is for 109 pitches. See table 5.1 below.

**Table 5.1 - Adjusted Five-Year Land Supply Requirement**

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	19-23	24-28	29-33	33-34	19-23	24-28	29-33	33-34	19-34
Year									
Meet Planning Definition (+62% undetermined)	85	24	21	4	0	0	0	0	134
Do Not Meet Planning Definition (+38% undetermined)	0	0	0	0	18	8	7	2	35
<b>TOTAL</b>	<b>85</b>	<b>24</b>	<b>21</b>	<b>4</b>	<b>18</b>	<b>8</b>	<b>7</b>	<b>2</b>	<b>169</b>

However, the Council are seeking to meet the needs of all Travellers, irrespective of whether or not they now meet the 2023 PPTS planning definition, so in response to question 5.1, the overall requirement of 169 pitches, including 30 pitches for those who do not meet the planning definition of a Traveller, is justified and robust; does have regard to the judgement in Lisa Smith and the subsequent changes to the PPTS in 2023.

The response to this question provides an updated position to that outlined through evidence base document [GRT12](#) 'GRT Background Paper (2024).

**Q5.2 Is there clear and robust evidence to justify the approach to demand from inward migration of Gypsy and Traveller households?**

A: The methodology followed for the GTAA ([GRT1](#)) is robust and has been found sound at numerous Examinations across England. This has addressed the matter of inward migration as part of establishing a future permanent pitch requirement for the District. Primary data has been collected via stakeholder and household interviews, whilst assessments of need for nearby Local Authorities have been reviewed for secondary data.

The conclusions drawn were that the GTAA does identify in-migration from 4 households in Figure 7. Other than these 4 households the GTAA did not identify any further evidence of households wishing to move to Newark & Sherwood, and so net migration to the sum of zero was assumed for the purposes of the assessment. This means that the requirements are driven by locally identifiable need. As evidenced through the Duty to Cooperate Statement ([CD13](#)), the constituent Authorities of the Nottingham Outer Housing Market Area have entered into a memorandum of understanding, setting out the intention for all Districts to meet their own needs in respect of all housing, including Traveller needs.

Paragraph 8.8 in the GTAA also clearly sets out the recommended approach to deal with any future in-migration – via the use of criteria-based polices, as opposed to making any specific allowances in relation to allocations. This has been provided for through Core Policy 5 'Criteria for Considering Sites for Gypsies & Travellers and Travelling Showpeople' in the [Amended Core Strategy](#).

This approach has been shown to be working following a review of permanent permissions that have granted since the baseline date for the GTAA (August 2019).

These are set out below and identify that 2 pitches have been granted to address need from in-migration.

**Table 5.2 - Inward Migration Analysis**

Site	Permitted Permanent Pitches	Notes
Land North of Crossways, off Main Street, Bathley (18/02219/FUL)	1	Granted at appeal. Proposed as single-family site. Applicants originally from Kent.  Application expressly presented as meeting needs from inward migration.
Chestnut Lodge, Barnby (21/00027/FUL)	2	Proposed as 2 family pitches to accommodate relocation from an existing site on Tolney Lane.  Application was not presented as meeting needs from inward migration.
Shady Oaks, Eagle Road, Spalford (21/02528/FUL)	4	Granted at appeal. Appellants statement of case detailed that the GTAA 'included the proposed site residents (some of whom are related to the appellants).' This is interpreted as confirmation that the proposed residents needs formed part of those identified through the GTAA.  Application was not presented as meeting needs from inward migration.
Chestnut Lodge, Barnby (23/00963/FULM)	19 (17 net, as the 2 previously permitted would be relocated)	No specific detail of occupants for the 17 net pitches provided, other than they would meet the condition restricting occupation to Travellers.  However, the applicant presented the case that future occupiers are likely to be from Tolney Lane where there are several pitches with temporary consent.  Application was not presented as meeting needs from inward migration.
Appleby Lodge, Newark (23/00060/FUL)	8	Applicant presented the case that 4 of the pitches would cater for the needs of households that formed component of the need identified in the GTAA – relocating from existing sites on Tolney Lane.  No details provided for occupants of the remaining 4 pitches – other than their occupation being restricted to Travellers.  Application was not presented as meeting needs from inward migration.
Oak Tree Stables, Besthorpe (22/01203/FULM)	8	Applicant presented the case that 3 of the pitches would be taken up by locally based Traveller households. Information provided for 1 of the pitches is inconclusive – and so could reflect inward migration.  No details of intended occupants provided for the remaining 4 pitches – other than that they would fall under the general restriction of occupation of the permitted pitches to Travellers.  Application presented as 1 pitch meeting the needs of inward migration.

Apart from the 2 permanent pitches that have been permitted to address need from in-migration, the additional permissions reflect the findings in the GTAA that pitch requirements for the District predominantly derive from locally identifiable needs, and that there is no other evidence available showing there to be meaningful additional inward migratory flows into the District.

Finally, the responses set out above also address the concerns raised in the representations ([010/GRT/LC/T3/T4/0015](#)) made by Representor 010 in respect of the GTAA identifying no firm evidence of households wanting to move into the District, there being no socially provided site and so no waiting list evidence, there having been applications submitted for families who have relocated and a suggested historic shortfall meaning it is unrealistic to assume zero in-migration.

**Q5.3 Is the approach to providing the bulk of provision in and around the Newark area and then in and around Ollerton, justified by clear evidence?**

A: Through Core Policy 4 in the Amended Core Strategy, it is detailed that future pitch provision will be provided in line with the Council's Spatial Strategy with the focus being to seek to secure additional provision in and around Newark Urban Area (NUA). The locational approach that has been followed is detailed at Paragraph's 3.5-3.7 of the Gypsy, Roma and Traveller Background Paper ([GRT12](#)). Core Policy 4 has provided the strategic direction for the site selection process, with the Council's interpretation of the policy being that it requires (where possible) to secure the bulk of the provision in and around the Newark Urban Area (NUA), before then considering other locations in line with the broader Spatial Strategy set through the ACS.

The NUA sits at the top of the Settlement Hierarchy in Spatial Policy 1 of the ACS, it is also the location where Core Policy 4 places an explicit emphasis on future provision being made. As articulated through Spatial Policy 1 in the ACS, the NUA has the function of being the focus for housing and employment growth in the District, and the main location for investment in new services and facilities. Below this level of the hierarchy sit the 'Service Centres,' including Ollerton & Boughton and which have the function of acting as a focus for service provision to a large local population and a rural hinterland. They represent sustainable locations with a range of services and facilities to support housing growth, of all forms, and offer local employment opportunities and access to those elsewhere.

The site selection process has defined the Newark Urban Area and Ollerton & Boughton as the 'Primary Area of Search,' but that where insufficient land could be identified within this area, then it would move on to 'secondary area of search' in line with the Spatial Strategy (the remaining Service Centres and then the Principal Villages), before then considering locations beyond this.

Focussing provision on sites in and around the Newark Urban Area, with lesser levels provided in and around Ollerton & Boughton would match the existing pattern of Gypsy and Traveller settlement within the District – which is focussed around existing communities in the Newark Area (largely at Tolney Lane). There is also a smaller concentration of sites in the Ollerton & Boughton/Wellow area, predominantly situated around the A616 and Newark Road junction. The District's future pitch requirements are driven by 'locally identifiable need,' and so it is these sites which underpin the need for a minimum of 169 pitches. This is shown in the table below –

which provides details of the location of existing sites identified in the GTAA, and their pitch requirements over the plan period. Roughly 82% of the overall pitch requirement is related to existing sites in the Newark Urban Area, and 17% connected to the Ollerton & Boughton/Wellow area. There is a single site away from these two locations, at Edingley. Many of these existing sites are private family sites, and where there is a need associated with them then there is the strong likelihood of a starting preference that it be met on site; so that family groups may stay together. Where this is not possible, then the secondary preference would likely be for new provision to be made close to the existing family site.

**Table 5.3 - Location of GTAA Sites**

	No. Existing Sites	Pitch Requirements
Newark Urban Area	19	138
Ollerton & Boughton / Wellow Area	6	28
Rest of District	1	3
<b>Total</b>	<b>26</b>	<b>169</b>

Earlier analysis provided in Table 5.1 demonstrates that 27 of the 40 permanent pitches (or 67.5%) granted permission since the start of the GTAA period (February 2019) were in or around the Newark Urban Area. Whilst Table 5.3, below, details the location of current temporary permissions and unauthorised sites, all of which are situated within the Newark Urban Area.

**Table 5.4 - Current Temporary and Unauthorised Sites (as at 30<sup>th</sup> September 2024)**

Site	Pitches	Status	Location
Old Stable Yard, Winthorpe	6	Unauthorised	Newark Urban Area
Park Views, Tolney Lane	15*	Temporary	Newark Urban Area
Land at Shannon Falls, Tolney Lane	21	Temporary	Newark Urban Area
Green Park, Tolney Lane	10	Unauthorised (lapsed temporary consent)	Newark Urban Area
Maryland Paddocks, Tolney Lane	17	Unauthorised	Newark Urban Area

\*Temporary permission allows for 15 'caravans'

The combination of the existing pattern of Traveller settlement, the type and location of need identified through the GTAA, the locations where permanent pitches have subsequently been granted and the places where there are currently temporary permissions and unauthorised sites provides strong evidence over where the demand for pitches is focussed. The site selection process has sought to meet need as close to the broad location it arises in and where demand is strongest. There are also practicalities which support this geographic approach, with those areas with meaningful existing Traveller communities possessing the services, facilities, and informal networks to support further accommodation. Critically, there are also distinct cultural differences between Travellers in the Newark and Ollerton/Wellow areas which any approach to site allocation will need to respect in order to be successful.

The importance of provision being made in the right places, is reflected within the aim of the [Planning Policy for Traveller Sites](#) to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply. Therefore, the Council has attempted to match locational demand to site identification as closely as the supply of suitable and deliverable land has allowed.



This emphasis on the Newark Urban Area and Ollerton & Boughton/Wellow hasn't, however, determined site identification alone. Constraints on the supply of suitable and deliverable land within these areas have been identified and taken account of, shaping the decisions taken by the Council. The Gypsy and Traveller Land Availability Assessment (GTLAA) ([GRT3](#)), Sequential Test Statement ([ENV19](#) and [ENV20](#)), Site Delivery Assessment (appended to [GRT12](#)) and Old Stable Yard Noise Assessment ([GRT8](#)) provide details over how those constraints have been established and considered. The proposed main modification (Core Document [CD05](#), MM15) around Old Stable Yard reflects this pragmatic approach, and whilst the land is situated within the Primary Area of Search, the Council no longer considers it to represent a sustainable or suitable candidate for allocation.

The ability to identify land away from this Primary Area of Search is, however, also dependent upon its suitability and availability. Section 4 of the Background Paper ([GRT12](#)) outlines the process followed and how site considerations were taken account of. The GTLAA ([GRT3](#)) provides detailed assessments of each site option, and concluded there to be sufficient 'may be suitable' land across the District to accommodate 467-513 pitches. This figure exceeds the overall requirement of 169. However, the figure is misleading, with site capacities having been assessed at a standard of 550sqm, rather than establishing a level of development which may be able to satisfy Policy C in the [Planning Policy for Traveller Sites](#). Whilst concluding sites to be 'May be Suitable' also highlights that there are outstanding policy and/or technical constraints, which would need to be overcome. Underlining the extent to which site allocation options have been dominated by land that is 'marginal' in nature.

Flood risk was one of these constraints, and there was the need to apply the Sequential Test, in order to prioritise the identification of suitable land at lesser risk. The process followed is detailed through evidence base document [ENV19](#) (Sequential Test Statement). Through the application of the Test, it has been robustly demonstrated that all the potential alternative site options beyond the Primary Area of Search are either unsuitable and/or undeliverable bar one (The Mulberries, Station Road, Collingham, [GTLAA Ref 19\\_0025](#)). However, whilst the land had been submitted by the landowner and its continued availability confirmed, there remain concerns over its genuine availability and deliverability for the use. The land is within non-Traveller ownership and would likely require the sale to a third party or the Council in order for it to be delivered. It is notable in this regard that at no point has this conclusion or the proposed non-allocation of the land been the subject of representations from the landowner.

Consequently, it is considered that the approach to providing the bulk of provision in and around the Newark area and then in and around Ollerton, is justified by clear and robust evidence. This reflects both the implications which flow from the existing pattern of Traveller settlement, the type and location of need identified through the [GTAA](#), and those locations where there is evidence of strong market demand from Travellers for land. Beyond this, there is insufficient alternative land that is both available and deliverable to support an alternative distribution of site allocation.

**Q5.4 Policy GRT/1 refers to a new assessment of pitch requirements within 5 years of the publication of the current Gypsy and Traveller Accommodation Assessment (GTAA). That is due in early 2025. Therefore, given that short time horizon, are the pitch requirement figures justified and sufficiently robust?**

A: Yes, the GTAA ([GRT1](#)) provides a robust understanding of the future pitch requirements over the plan period, consistent with the requirements of the PPTS. This requires that Local Planning Authorities make their own assessment of need for the purposes of planning. Through Policy A in the PPTS, the need for effective and early engagement is underlined as part of the requirement to prepare and maintain and up-to-date understanding of the likely permanent and transit accommodation needs of the area over the lifespan of the Development Plan. There is also an emphasis on using robust evidence to establish accommodation needs to inform the preparation of the Local Plan. In terms of the identification of sites through the Plan – then the minimum requirements set through Policy B, would be to identify (and update annually) a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against those locally set targets. Beyond this there is a need to identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and where possible for years 11-15.

Following a robust and credible methodology, the Assessment provides both an understanding of overall requirements across the Plan Period, and for the levels of need within distinct five-year periods to enable the requirements of the PPTS to be satisfied. This methodology placed an emphasis on obtaining primary data from site occupants via interview, and where this was not possible to, then researchers have sought to capture as much information as possible on each pitch from the proxy interview of neighbouring residents and site managers (where present). This has provided a reliable and accurate understanding of need at pitch and household level. The findings are therefore not based on speculative modelling, and show a strong locally identifiable need, with no meaningful inward migration being established. As a result, the data obtained is 'real world' in nature, and traceable back to specific households. This has allowed for fine grain analysis to take place and provides confidence that the requirements remain robust beyond the initial five-year period.

The [GTAA](#) represents the first comprehensive local assessment of Traveller accommodation needs, and so the purpose of the wording is to put in place a policy mechanism to trigger periodic review. This commitment will ensure that an up-to-date understanding of need is maintained, as per the requirements of the PPTS. Due to the nature of this form of assessment, there are significant timescales involved in its preparation and so the proposed policy mechanism is intended to ensure that the work is commissioned in a timely manner.

Policy GRT/1 clearly sets out that a review of current pitch requirements and a new assessment of need will be *commenced* within 5 years of the publication of the current Gypsy and Traveller Accommodation. The Council are committed to seeking to put in place measures to procure a new GTAA in early 2025 to meet this requirement, although the outcomes of the new GTAA may not be available until later in 2025 or early 2026. This is primarily due to a backlog of GTAA fieldwork capacity across the country following the COVID-19 lockdown periods.

**Q5.5 Is the approach to provision by extending existing sites, bringing existing sites back into use and new site allocations justified and robust in terms of meeting the latest evidenced need?**

A: The approach towards site selection and allocation is justified and robust and supports a deliverable strategy for the provision of additional pitches on existing sites, bringing sites back into Traveller use and delivering entirely new site allocations. Further detail on the process is provided through evidence base document [GRT12](#) (Gypsy, Roma and Traveller Background Paper 2024).

Representor 054 has raised objections ([054/GRT4/PMap/2/T1/T2/T3/T4/0138](#), [054/GRT4/PMap/2/T1/T2/T3/T4/0227](#) and [054/GTAA/T1/T2/T3/T4/0139](#)) to the allocation of NUA/GRT/11 (Land at the Former Belvoir Ironworks, Bowbridge Lane, Newark), citing concerns around services and facilities, access, and highways. The site assessment within the GTLAA ([GRT10](#)) concludes that access to services and facilities will be improved through delivery of the Land South of Newark Strategic Site. This will entail delivery of a Local Centre (incorporating convenience retail provision and other services and facilities) in the part of the strategic site closest to the Belvoir Ironworks site. This will also involve the bringing forward of 50ha of employment land, substantial Green Infrastructure, and open space provision as well as integration of public transport services. The Council therefore remains of the view that the site is suitable for allocation in respect of its access to services and facilities.

In terms of the additional pressure the site allocation may have on services and facilities being provided as part of the Middlebeck development, further input was sought from the County Council in its role as Education Authority. The body confirmed that site of the Former Belvoir Ironworks is located within the Newark Town Planning Area which comprises the new primary school at Middlebeck as well as several other local primary schools. The forecast data produced by the County Council, which is inclusive of the demand anticipated from the development of Middlebeck, indicates that there will be a large surplus of primary school places within the planning area over the five year projection period.

This forecast surplus capacity within the Newark Town Planning Area would be sufficient to accommodate the demand which would arise from the Former Belvoir Ironworks, as well as the Council's identified opportunity sites, should they come forward. Moreover, the S106 Agreement pursuant to the outline permission for Middlebeck will enable the further expansion of the new primary school within the development, which will enable further capacity to be delivered within the planning area, if necessary. As such the County Council did not consider that the proposed allocation would have an adverse impact on education services.

The objection also refers to the combined impact of Land at Flowserve Pump Division and the extension to Site NUA/Ho/10 (Land North of Lowfield Lane). These sites are located within the Balderton Planning Area and therefore would not impact upon school place sufficiency within Newark Town. The forecast data produced by the County Council indicates that there will be a moderate surplus of primary school places within that planning area over the five year projection period and the County Council has secured land and funding to provide additional capacity at schools within

Balderton to meet demand as needed, arising from the housing growth around Fernwood and these additional sites should they be delivered.

With respect to the representors concerns around access and highways, additional input was also provided by the County Council as Highways Authority. The Authority concluded that the site has a footway/cycles way link into the Middlebeck development and beyond, providing sustainable access to services and facilities. Whilst accepting that trip rates may be higher for this form of development, due to the prevalence within Traveller communities for extended families living together this would not constitute a reason for a Highways objection in itself. Instead, there would be a requirement for application of a lesser threshold for provision of a Transport Assessment/ Study as part of a future application.

In terms of the standard of access the Authority was of the view that the site is just within a national speed limit, on the edge of a 30mph speed limit. The bends on each approach to the possible access for the land are such that they are considered speed reducing features, and whilst it is quite possible that vehicles will be exceeding 30mph due to the current open aspects, it is thought unlikely that the 85th%ile speed will be 60mph. Visibility to the north of around 100 metres is available and visibility to the south is around 140m which is considered to be adequate here in consideration of the likely speeds, constrained by the bends. The adopted highway corridor in the vicinity of the access is approximately 21 metres wide, which should accommodate the suggested ghost island if demonstrated to be required. The Council has followed the advice of the Highways Authority, and it has not raised an objection to the identification of the site. As a result, the Council continues to be of the view that the site is acceptable for allocation.

#### Latest Evidenced Need

In terms of the latest evidenced need, this is provided through the GTAA ([GRT1](#)) and the response to Q5.1, which outlines the implications from the 'Lisa Smith Judgement'. With regards to the identification of sites to meet this evidenced need then it is Policy B in the Planning Policy for Traveller Sites which provides the minimum requirements that the Plan needs to meet. The Policy carries the minimum requirement that in producing the plan; a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the locally set targets should be identified (and updated annually). Beyond this a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible for years 11-15 should also be identified.

However, as outlined in Section 3.0 of evidence base document [GRT12](#), the Council has been consistently on record over its desire to exceed the lowest bar set through national policy, and has proposed an approach which fulfils this objective.

#### Local Targets

The Council has set an overall pitch requirement over the plan period of **169 pitches** addressing the full requirements of all Travellers. How this overall need breaks down into five-year blocks for the plan period is detailed below.

**Table 5.5 - Overall Pitch Requirement Breakdown**

2019-23	2024-28	2029-33	2033/34	Overall
103	32	28	6	<b>169</b>

However, in terms of the five-year land supply test then the appropriate local target would be one consistent with application of the Traveller definition provided in Annex 1 to the PPTS, and now updated to account for the Smith judgement. As outlined in the response to Q5.1 this equates to **134 pitches** overall. How this overall need breaks down into five-year blocks for the plan period is detailed below.

**Table 5.6 - Annex 1 Pitch Requirement Breakdown**

2019-23	2024-28	2029-33	2033/34	Overall
85	24	21	4	<b>134</b>

Pitch Completions and Commitments Update

The table below provides the current position (as at 11<sup>th</sup> October 2024) for pitches which have been completed since the start of the GTAA period (August 2019)

**Table 5.7 - Traveller Pitch Completions (as at 11<sup>th</sup> October 2024)**

Ref	Site	Completed Pitches
18/02219/FUL	Land north of Crossways, off Main Street, Bathley	1
21/00027/FUL	Chestnut Lodge, Barnby	2
		<b>3</b>

The table below provides the current position (as at 11<sup>th</sup> October 2024) for pitches with an extant planning permission.

**Table 5.8 - Traveller Pitch Commitments (as at 11<sup>th</sup> October 2024)**

Ref	Site	Permitted Pitches
21/02528/FUL	Shady Oaks, Eagle Road, Spalford	4
23/00963/FULM	Chestnut Lodge, Barnby	17*
23/00060/FUL	Appleby Lodge, Newark	8
22/01203/FULM	Oak Tree Stables, Besthorpe	8
		<b>37</b>

\*Note permission provides for 19 overall, but only a net 17 in terms of additional supply as 2 of the 19 were those granted under 21/00027/FUL and relocated through this later permission

Assessment of Supply

Overall Target

The overall requirement the Council has aspired to satisfy is 169 pitches, reflecting the full GTAA need. However, through the minimum test within Policy B of the PPTS this would breakdown to the need to identify specific deliverable sites for 103 pitches, beyond this there would also need to be broad locations for growth; sufficient to account for a further 32 pitches.

The analysis provided above shows there to have been 3 pitches completed since the start of the GTAA period, this reduces the minimum requirement for specific deliverable sites down from 103 to 100 pitches. Table 5.8 shows there to be a further 37 pitches with planning permission on specific deliverable sites.

Through the submitted Plan there are a range of specific deliverable site allocations proposed, which will deliver additional pitches. These are outlined in the table below. Where a commitment is also a proposed allocation, then they have been removed to avoid double counting. Old Stable Yard (NUA/GRT/12) is also proposed for de-

allocation through the suggested Main Modification MM15 ([CD05](#)) and so has been discounted for the purposes of this analysis.

**Table 5.9 - Supply from Remaining Proposed Site Allocations**

Ref	Site Allocation	Allocated Pitches
<b>Existing Sites</b>		
NUA/GRT/1	Park View, Tolney Lane, Newark	13
NUA/GRT/2	Sandhill Sconce, Tolney Lane, Newark	11
NUA/GRT/3	The Paddocks, Tolney Lane, Newark	3
NUA/GRT/4	Hirram's Paddock, Tolney Lane, Newark	7
NUA/GRT/5	Taylor's Paddock, Tolney Lane, Newark	1
NUA/GRT/6	Price's Paddock, Tolney Lane, Newark	1
NUA/GRT/7	Land at Shannon Falls, Tolney Lane, Newark	21
OB/GRT/1	Shannon Caravan Site, Wellow Road, Ollerton	9
OB/GRT/2	The Paddock, Wellow Road, Ollerton	3
OB/GRT/3	The Stables, Wellow Road, Ollerton	4
OB/GRT/4	Dunromin, Wellow Road, Ollerton	4
OB/GRT/5	Greenwood, Wellow Road, Ollerton	1
<b>Sub Total</b>		<b>78</b>
<b>Sites Brought Back into Use</b>		
NUA/GRT/8	Church View, Tolney Lane, Newark	10
NUA/GRT/9	Riverside Park, Tolney Lane, Newark	9
<b>Sub Total</b>		<b>19</b>
<b>Remaining Proposed New Site Allocations</b>		
NUA/GRT/10	Land at Chestnut Lodge, Barnby	2  (with 17 out of the proposed total allocation for 19 new pitches now having permission)
NUA/GRT/11	Land at the former Belvoir Ironworks, Bowbridge Lane, Newark	15-27
OB/GRT/6	Land East of Newark Road, Ollerton	6
<b>Sub Total</b>		<b>23-35</b>
<b>Total Supply</b>		
<b>Total</b>		<b>120-132</b>

Therefore, through commitments and proposed site allocations the Council can identify the following overall supply.

**Table 5.10 - Overall Pitch Supply**

<b>Pitches with Planning Permission (commitments)</b>	37
<b>Remaining Pitches on Proposed Site Allocations</b>	120-132
<b>Total</b>	<b>157-169</b>

This comfortably exceeds the (adjusted) minimum requirement to identify specific deliverable sites capable of supporting 100 pitches under Policy B of the PPTS. Indeed, at the upper end of the range it satisfies the target the Council has set itself. Once the additional proposed broad locations (NUA/GRT/BL/1 and OB/GRT/BL/1) identified within the Plan are taken account of then the approach provides additional flexibility.

#### Five Year Land Supply

As outlined above Table 5.6 provides what the Council considers to be the appropriate target for calculation of the five-year land supply test, with this equating to 134 pitches overall. The table splits the GTAA need down into five-year periods, and we are now into the second five-year period (2024-28). Across the period 2019-28 there is a

requirement for **109 pitches**. There have been 3 pitches completed within this period, and there are extant permissions capable of providing for a further 37 pitches. It has been assumed that these extant permissions will be delivered in full within the current five-year period.

The remainder of the supply will come from delivery on proposed site allocations. Where these concern an existing site, then it has been assumed that only pitches to meet the need identified between 2019-28 will come forward within the current five-year period (2024-28). This is considered to provide for a robust and realistic forecast of delivery from this source of site. The forecast delivery within 2024-28 from the remaining proposed site allocations is outlined below.

**Table 5.11 - Delivery from Remaining Site Allocations within 2024-28**

Ref	Site	Remaining Pitch Allocation	2024-28 Delivery
NUA/GRT/1	Park View, Tolney Lane, Newark	13	13
NUA/GRT/2	Sandhill Sconce, Tolney Lane, Newark	11	11
NUA/GRT/3	The Paddocks, Tolney Lane, Newark	3	2
NUA/GRT/4	Hirram's Paddock, Tolney Lane, Newark	7	4
NUA/GRT/5	Taylor's Paddock, Tolney Lane, Newark	1	0
NUA/GRT/6	Price's Paddock, Tolney Lane, Newark	1	0
NUA/GRT/7	Land at Shannon Falls, Tolney Lane, Newark	21	21
NUA/GRT/8	Church View, Tolney Lane, Newark	10	10
NUA/GRT/9	Riverside Park, Tolney Lane, Newark	9	0
NUA/GRT/10	Land at Chestnut Lodge, Barnby	2	2
NUA/GRT/11	Land at the Former Belvoir Ironworks, Newark	15-27	15
OB/GRT/1	Shannon Caravan Park, Wellow Road Ollerton	9	8
OB/GRT/2	The Paddock, Wellow Road, Ollerton	3	3
OB/GRT/3	The Stables, Wellow Road, Ollerton	4	2
OB/GRT/4	Dunromin, Wellow Road, Ollerton	4	4
OB/GRT/5	Greenwood, Wellow Road, Ollerton	1	0
OB/GRT/6	Land East of Newark Road, Ollerton	6	6
	<b>Total</b>	<b>120-132</b>	<b>101</b>

Drawing on the above an updated Five-Year Land Supply Statement is provided below.

**Table 5.12 - Five Year Land Supply Statement (11<sup>th</sup> October 2024)**

<b>First Five-Year Period (2019-23)</b>	
Five Year Pitch Requirement	85
Completed Pitches within Period	3
Residual Requirement	82
<b>Second Five-Year Period (2024-28)</b>	
Five Year Pitch Requirement	24
Residual Requirement 2019-23	82
Completed Pitches within Period	0
Adjusted Requirement	106
Annualised Requirement	21.2
<b>Supply</b>	
Pitch Supply from Unimplemented Permissions	37
Pitch Supply from Allocated Sites	101
Total Supply	138
<b>No. Years Supply</b>	
Against Requirement	<b>138/21.2= 6.51 years</b>

The above demonstrates that the proposed approach through the Amended Allocations & Development Management DPD can identify a supply of specific deliverable sites sufficient to exceed five years' worth of sites against the local target.

#### Main Modifications

In order for the Plan to fully respond to the implications of the Smith judgement, and the latest evidenced need data (outlined in the response to Q5.1), the Council would welcome the opportunity to discuss the potential for main modifications being made to Policy GRT1, and its supporting justification. These modifications would be to make clear that the Council has set an overall requirement of 169 pitches over the plan period. But that the relevant local target for the five-year land supply test is that compliant with Annex 1 of the PPTS, and this equates to 134 over the plan period (breaking down into the distinct five-year blocks detailed in Q5.1).