

TOWN AND COUNTRY PLANNING ACT 1990

**APPEAL (1) BY MR DREW PRICE AND MR JAMES BALL
AGAINST THE REFUSAL BY SOUTH CAMBRIDGESHIRE
DISTRICT COUNCIL OF A PLANNING APPLICATION FOR ‘A
MATERIAL CHANGE OF USE OF LAND THROUGH
INTENSIFICATION TO THE STATIONING OF CARAVANS FOR
RESIDENTIAL PURPOSES, NINE DAYROOMS AND THE
FORMATION OF HARDSTANDING ANCILLARY TO THAT USE.’**

**LAND TO THE SOUTH OF CHEAR FEN BOAT CLUB,
TWENTYPENCE ROAD, COTTENHAM, CAMBRIDGESHIRE,
CB6 8PX**

GPS REFERENCE: 21_1161B

LPA REFERENCE: 22/01703/FUL

PINS REFERENCE: APP/W0530/W/22/3308444

**STATEMENT OF NEED FOR GYPSY AND TRAVELLER PITCHES
IN SOUTH CAMBRIDGESHIRE ON BEHALF OF THE APPELLANT**

GREEN PLANNING STUDIO LTD

Preliminary Issues

1. This assessment considers the Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers for South Cambridgeshire District and Cambridge City Councils [“the **GTAA**”] dated September 2024 by Arc⁴ (Appendix C1).
2. It is understood that this is the Council's most recent GTAA. If the Council seeks to rely on a different GTAA, the Appellant will need to be given opportunity to review the same.
3. For the avoidance of doubt, the figures within the GTAA are not agreed. It is clear upon review of the GTAA that there are various errors therein that will have resulted in an underestimation of the need in the District and the lack of and need for gypsy and traveller pitches is worse than the Council figures portray. This assessment seeks to highlight those errors.
4. However, there are preliminary issues to be noted before any substantive analysis.

PPTS Definition

5. The GTAA was published in September 2024, prior to both the 2024 PPTS and 2024 NPPF.
6. The GTAA is based on a now outdated PPTS definition. As of 12th December 2024, the PPTS definition is as follows:

“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.”

7. Following the change in the PPTS definition it is anticipated to be common ground that the need for all Travellers who live, or wish to live, in caravans, will need to be met by the Council through the PPTS.

Requirement to demonstrate a five-year supply

8. Local Authorities are required to demonstrate a five-year supply in relation to their Gypsy, Travellers and Travelling show people pitches. Paragraph 78 of the 2024 NPPF provides sets out the requirement on Council's to:

“...identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing”

9. Footnote 56 makes it clear that the requirement also applies to gypsy and traveller pitches.

“in the case of traveller sites means the lack of a five year supply of deliverable traveller sites assessed in line with Planning Policy for Traveller sites”

10. This is also made clear in the Planning Policy for Traveller Sites 2024 at paragraph 10 which provides:

“Local planning authorities should, in producing their Local Plan:

a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets”

11. Further, Planning Policy for Traveller Sites 2024 at paragraph 28 makes it clear that the absence of a 5-year supply is sufficient to trigger the weight balance at paragraph 11(d) NPPF.
12. In **Frankham and others v South Cambridgeshire Council** (Appendix C2) an appeal determined in December 2024; just four months prior to the scheduled inquiry in this appeal, the Council conceded that they were unable to demonstrate a five-year supply of gypsy and traveller pitches. This was prior to the latest change in the PPTS definition, as considered above, which will increase levels of need further.
13. The GTAA identifies a need for 41 pitches in the period 2023/2024 – 2027/2028. With a further 37 pitches required in the period 2028/29 – 2032/33. Whilst reliance was not made to the GTAA within that appeal, the GTAA was published in September 2024 and the Council officers would have been aware of this when making their statements.

14. There is no evidence to suggest that the Council's position has changed and we anticipate that a similar concession will be made in this appeal. This is particularly so given that the GTAA identifies a need for 41 pitches in the period 2023/2024 – 2027/2028 with a further 37 pitches required in the period 2028/29 – 2032/33. The Council have no allocations for gypsy and traveller pitches. Thus, even on the Council's own figures there is a substantial five-year need. The Council are invited to concede on this point to avoid additional costs being incurred unnecessarily.

List of Sites

15. Unhelpfully, the GTAA does not provide a list of sites. This is a change in approach from Arc⁴ who previously provided details of the sites considered within their assessments.
16. The failure to list the sites considered undermines the robustness of the GTAA as there is no means by which the data referred to therein can be verified. The Council are requested to provide a list of sites considered within the GTAA, to allow for further investigation.
17. Pending which, and given the absence of data within the GTAA and the substantial need for pitches identified therein; 130 pitches across the plan period, GPS do not intend to address every site within the GTAA. Instead, the below assessment seeks to highlight that there are numerous errors or inconsistencies within the GTAA, which will have resulted in an underestimation of the level of need for pitches within the District.

Statutory Framework

18. The House and Planning Act 2016 at section 124 sets out:

Assessment of accommodation needs

(1) In [section 8](#) of the Housing Act 1985 (periodical review of housing needs), after subsection (2) insert—

“(3) In the case of a local housing authority in England, the duty under subsection (1) includes a duty to consider the needs of people residing in or resorting to their district with respect to the provision of—

(a) sites on which caravans can be stationed, or

(b) places on inland waterways where houseboats can be moored.

(4) In subsection (3)—

“caravan” has the meaning given by [section 29](#) of the Caravan Sites and Control of Development Act 1960;

“houseboat” means a boat or similar structure designed or adapted for use as a place to live.”

(2) In the [Housing Act 2004](#) omit sections 225 and 226 (accommodation needs of gypsies and travellers).**[GPS emphasis]**

19. All gypsies and travellers living in caravans fall within this section and Local Authorities are required to consider their accommodation needs.
20. Whilst the Housing and Planning Act 2016 has repealed s225 and s226 of the Housing Act 2004 which referred specifically to the need to carry out an assessment of the accommodation needs of gypsies and travellers, in practice there is no difference.
21. There remains a duty to assess and consider the accommodation needs of gypsies and travellers, and this would cover all gypsies and travellers who wish to reside in caravans as opposed to bricks and mortar housing.
22. Gypsies and travellers often have a cultural aversion to bricks and mortar and therefore require culturally suitable accommodation. This is a relevant protected characteristic under the Equality Act 2010.
23. The Equality Act 2010 imposes a public sector equality duty under s149:

Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

[GPS emphasis]

Planning Policy

24. Planning Policy for Traveller Sites (“the PPTS”) which was first published in 2012, subsequently revised in August 2015 and most recently December 2024 states:

“The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

To help achieve this, Government’s aims in respect of traveller sites are:

a. that local planning authorities should make their own assessment of need for the purposes of planning”

25. The definition of gypsies and travellers within the PPTS 2024 has been amended and is as follows:

“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.”

26. This definition is understood to be, in part as a result of the Court of Appeal judgement in the case of **Lisa Smith v Secretary of State** (Appendix C3).
27. Assessments of gypsy and traveller accommodation needs by Green Planning Studio have always taken a realistic and practical approach in including all gypsy and traveller sites. With the revision to the definition in the 2024 PPTS the Government has now firmly fallen into line with the approach towards assessing gypsy and traveller need taken by Green Planning Studio for almost 20 years.

28. Within the revised NPPF 2024, paragraph 62 states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

29. Paragraph 63 of NPPF 2024 provides further clarification to paragraph 62, and includes gypsy and traveller need within the national policy framework:

“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) travellers”.

30. This provides clarification that the accommodation needs should be met for all gypsies and travellers, whether they meet the definition or not.

Local, regional and national Need

31. It is a matter of commonsense that the consideration of need goes beyond the need within a district and includes need in the sub-region / region and nationally.
32. The Planning Policy for Traveller Sites (PPTS) is designed to increase the number of authorised Gypsy sites, particularly privately owned ones, (see paragraph 4, criteria e). This is consistent with the previous Circular 01/06 at paragraphs 3 and 12c.
33. Paragraph 7c of the PPTS sets out that a robust evidence base must be used to establish accommodation needs. This is again consistent with the previous Circular 01/06.
34. Outside of the GTAA/GTNAs and LPA records of permissions/appeals there are two other sources of information that can assist and can be considered. These are:
 - The DCLG Caravan Count (collected biannually)
 - The 2011 and 2021 Census

The DCLG Caravan Count

35. The ODPM/DCLG Gypsy count figures are almost universally an underestimation of the number of caravans and also need in any district for the following reasons:
- a. The figures do not include hidden need: i.e., those in bricks and mortar houses who have had to live in a house due to lack of provision and would prefer to live in a caravan.
 - b. The methodology used by councils to count caravans varies considerably, e.g. In some cases, caravans are excluded or included in the 'with permission' column when they don't have permission in certain circumstances.
 - c. The figures do not take account of overcrowding within caravans.
 - d. On authorised sites the figure is often that of the permitted capacity rather than the actual number which can exceed this through doubling up.
 - e. People living in caravans in the gardens of houses or in commercial yards or staying on lawful holiday permission touring sites are not recorded.

2011 and 2021 Census information

36. Census data is an important source of information.
37. The 2021 Census data (Appendices C4 and C18) has now been published and is considered below.
38. Appendix C6 is based on the 2011 census data, however, GPS are not aware of an updated version this report yet having been published.
39. The following points should be noted about the 2021 census data.
40. The 2021 census recorded 71,440 people in households in England and Wales who completed the census who chose to identify themselves as 'Gypsy or Irish Traveller'.
41. The 2021 Census is likely to significantly under-record the number of gypsies and travellers in the UK This is likely to have occurred due to a number of factors which fall into two categories. Firstly, entire households not being recorded at all. This would be the result of:
 - The transient nature of the population. This is more likely to be a bigger issue in the caravan-based population.
 - The cultural distrust of authority.
 - Low levels of literacy.
42. Secondly it is likely many gypsy and traveller households who completed the census will have not declared they are gypsy and travellers. This will be due to a fear of (obviously not likely in practice) neighbours finding out their backgrounds. This problem is more likely to occur with those in bricks and mortar.
43. This can clearly be shown, in that the Census found approximately 14,915 people living in caravans in England and Wales and 13,975 in just England. However, the July 2021 caravan count (which will not have recorded all caravans lived in by gypsies and travellers) found 24,203 caravans across England (the respective figure for England and Wales not being provided).

44. It is highly improbable that that many caravans would house that few people. It is more likely that that the caravan-based population is around 4 times the level found in the census.
45. This is backed up by analysis of the first tranche of GTAA's carried out by the Irish Traveller Movement in Britain in their August 2013 report 'Gypsy and Traveller population in England and the 2011 census' which found an estimated population of 119,193. These figures come with the caveat that the GTAA's are likely to underestimate the number of households (and therefore population) living in caravans and significantly underestimate the bricks and mortar population.
46. GPS believe that the 2021 Census is likely to record no more than one third of the gypsy and traveller population in England and Wales.
47. What the Census information does do however is provide a statistically robust sample which assists in two key areas.
48. Firstly, the population age profile. This assists in considerations of future growth rates.
49. Secondly the ratio between gypsies and travellers in bricks and mortar (76%) and caravans (24%). This assists in considering likely number of households in bricks and mortar when considering the net movement of households between bricks and mortar and caravans.

National need for gypsy and traveller sites

50. The ODPM/DCLG gypsy count identified approximately 27,429 travellers in caravans in July 2024 in England and approximately 26,639 travellers in caravans in January 2024 in England.
51. There were 4,018 unauthorised caravans reported in the July 2024 count, an increase of 297 since January 2024.
52. Given that the caravan counts are almost always an underestimation; these figures represent a clear need for gypsy and traveller sites nationally.
53. Despite this, the Government approach towards gypsies and travellers remains negative, with the Planning Resource observing that a recent consultation is focused upon stronger enforcement, rather than site supply (Appendix C7).

PART TWO: Assessment of Gypsy and Traveller Needs in South Cambridgeshire

District

54. This assessment considers the Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers for South Cambridgeshire District and Cambridge City Councils [“the **GTAA**”] dated September 2024 by Arc⁴ (Appendix C1).
55. The GTAA’s summary in relation to the need for pitches is set out in Table ES1 (replicated below).

Table ES1 Gypsy and Traveller pitch need across South Cambridgeshire 2023/24 to 2040/41

Period	Pitch need South Cambridgeshire
5 year Authorised Pitch Shortfall (2023/24 to 2027/28) (A)	41
Longer-term need	
Over period 2028/29 to 2032/33 (B)	37
Over period 2033/34 to 2037/38 (C)	30
Over period 2038/39 to 2040/41 (D)	22
Longer-term need TOTAL to 2040/41 (13 years) E=(B+C+D)	89
NET SHORTFALL 2023/24 to 2040/41 (A+E) (18 years)	130
Annual net shortfall	7.2

56. Within the executive summary of the GTAA, the following households and pitches are confirmed as having been identified:
- 2 council sites, 32 pitches (32 occupied by 32 Gypsy and Traveller households, 0 vacant)
 - 56 private authorised sites, 342 pitches (238 occupied by 243 Gypsy and Traveller households, 70 by non-Gypsy/Traveller households, 34 vacant pitches). There are some pitches where there are more than one household present but any needs arising are covered in pitch need analysis.
 - 2 sites with lapsed planning permission, 2 pitches (2 occupied by 2 Gypsy and Traveller households)
 - 4 sites with planning permission pending, 13 pitches (11 occupied by 11 Gypsy and Traveller households, 2 vacant)
 - 1 unauthorised site, 1 pitch (0 occupied by Gypsy and Traveller households, 1 vacant)
57. The GTAA concludes that for the period 2023/24 – 2040/41, 130 pitches are required to meet gypsy and traveller need.
58. The January 2024 and July 2024 caravan counts (the counts closest to the alleged base date) for South Cambridgeshire has 624 and 562 caravans respectively allegedly none of which were on unauthorised sites (Appendix C8), which is interesting given the existence of the appeal site, and possibly others.

59. Green Planning Studio has identified several flaws in the methodology and approach used in the GTAA which will have resulted in an underestimation of the level of need for pitches in the District. These are considered below.

Survey Data

60. Section 3 of the GTAA sets out the methodology employed which was as follows:

“ The methodology across the different groups covered in the study has comprised:

☐ *a desktop analysis of existing documents, including data on pitches / sites, plots / yards, caravan sites, residential moorings, and unauthorised encampments, and from the 2021 Census;*

☐ *the collection of primary data, including household interviews with Gypsies and Travellers, Travelling Showpeople and boat dwellers, and information from planning applications;*

☐ *a survey of residential caravan site owners; and*

☐ *an assessment of accommodation needs taking into account all available data and information.*

The information gathering has been carried out in three phases, as outlined below:

☐ *Phase 1: Literature / desktop review.*

☐ *Phase 2: Survey of Gypsies, Travellers and Travelling Showpeople across the district; stakeholder consultation; survey of boat dwellers; and survey of residential caravan site owners.*

☐ *Phase 3: Needs assessment and production of the ANA report”.*

61. In relation to fieldwork, paragraph 3.5 of the GTAA goes on to state:

“Site visits took place in April 2023, with interviews carried out in two main phases – April to June 2023 and September to December 2023 to ensure that households travelling had the opportunity to contribute to the research.”

62. If interviews ceased in December 2023, it is unclear why a base date of 31st March 2024 is cited, which in relation to some sites will be over one year on from when the interviews took place.

63. The executive summary states, *“any changes in site status or new sites coming forward during 2023/24 have been taken into account and the study therefore has a final base date of 31st March 2024 which is within the 2023/24 financial year.”* However, the GTAA is unclear how these changes have been identified, particularly in relation to sites interviewed some 12 months earlier. GPS will use a base date of 31st December 2023 in the absence of confirmation given that this is the last date cited as when fieldwork was taking place.

64. The GTAA claims a response rate of 61.5%, this is based on data for 177 households being obtained out of a total of 288 households. The GTAA acknowledges this is a lower than anticipated response rate, which will undermine the robustness of the GTAA.
65. GPS contend the response rate ought to be further reduced. The response rate is based on 148 households having been interviewed and data for 19 households having been obtained from application data. No details of the application data are provided, it is unclear if full data was included and if it was up to date. In any event data on concealed or doubled up households are unlikely to be included in application data. It is inappropriate to include these households in the response rate when no interviews have taken place. Removing those households reduces the response rate to 51.38%. Further reductions would ensue if the additional households identified by GPS below were also taken into account.
66. It is unclear from the GTAA how many attempts were made to visit each site. It is unclear both in relation to attempts to pre-arrange an interview and in relation to the attempts to undertake speculative interviews, what time of the day attempts were made to visit sites to undertake interviews.
67. This response rate also excludes gypsy and travellers households in bricks and mortar. The executive summary confirms that no interviews took place with those in bricks and mortar.
68. The failure to interview a greater number of households impacts directly on the accuracy base data and household growth. The lack of more robust survey data, achieved through greater household interviews, will undermine the overall accuracy of the conclusions.

DEMAND

Authorised Households

Permanent Planning Permission – Public Sites

69. The GTAA at Table 4.5 identifies two public sites, each with planning permission for 16 pitches. The sites are not named, and no details of the relevant planning permissions are provided.
70. The failure of the GTAA to provide details of the sites in relation to both public and private sites, undermines the conclusions, in preventing detailed investigation of the data relied upon therein.
71. GPS have obtained the previous gypsy and traveller accommodation assessment by Opinion Research Services dated October 2016 (“the **2016 GTAA**”) (Appendix C9) wherein two public pitches of the same size are referenced.
72. GPS have not identified any subsequent grants of permission at these sites and as the figures of **32 authorised households** on public pitches are agreed.

Permanent Planning Permission – Private Sites

73. The GTAA within the Executive Summary identifies 56 private authorised sites totalling 342 pitches.
74. As above, unhelpfully, the GTAA does not identify those sites within reference to their location or name. This is a change in approach from Arc⁴ who have previously provided details of the sites considered. The failure to list the sites considered only serves to undermine the robustness of the GTAA. There is no means by which the data referred to therein can be verified.
75. As above, given that the GTAA identifies a substantial need for pitches, 130 pitches across the plan period, GPS do not intend to address every site within the GTAA. Instead, the below assessment seeks to highlight that there are numerous errors or inconsistencies

within the GTAA, which will have resulted in an underestimation of the level of need for pitches within the District.

76. It is claimed that 238 of the pitches identified by Arc⁴ are occupied by 243 gypsy and traveller households. Thus, there is evidence on the GTAA's own figures of at least 5 concealed or doubled up households which is considered further below.

77. The GTAA alleges that there are 70 pitches occupied by non-Gypsy/Traveller households. It is unclear who made this determination and whether they were appropriately qualified to do so. In event, the fieldwork for the GTAA was undertaken prior to the PPTS 2024 changes. As of 12th December 2024, the PPTS definition of gypsy and traveller is as follows:

*“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.” (GPS emphasis added)*

78. Whilst GPS accept that pitches occupied by non gypsy and traveller households ought be excluded from the assessment, both in terms of demand and supply, the widened definition now includes all persons with a cultural tradition of nomadism or living in a caravan which, may now include some of the households on those 70 pitches. The GTAA will require revision to address this.

79. Pending those revisions, GPS remove the 70 households and the pitches upon which they reside from the scope of this GTAA. Based on the 342 privately authorised pitches identified, this reduces to 272 pitches.

80. The GTAA further alleges that there are 34 vacant pitches on authorised sites.

81. The GTAA does not set out what checks are undertaken to ensure that a site is truly vacant. Merely because a privately owned pitch is vacant at the time of a visit does not mean it is not the permanent base for a household, who may be away travelling, particularly if it is for a long period of time. For instance, it is far from unknown for Irish traveller families to spend

several months in Germany and other central European countries seeking work, or to travel to Ireland for months at a time. When families are away for long periods of time, they often remove as much as they can from a site so it isn't vandalised or stolen in their absence.

82. GPS would not consider it appropriate to automatically discount those households entirely from the number of authorised households as appears to have been done by Arc⁴ within this and other GTAA's. There are concerns about this as an approach,

83. GPS now unless evidence indicates to the contrary, treat 50% of all vacant pitches on private sites as being the permanent base for a household; those pitches considered 'vacant' are then treated as components of supply.

84. As above, the GTAA fails to identify, with reference to site names or locations where these vacant pitches are preventing detailed scrutiny. However, it is noted that in **Price v South Cambridgeshire** (Appendix C10) determined in February 2024, and therefore the evidence likely having been produced at the same time as the GTAA fieldwork etc, that the Council's position was that there were no vacancies in the District:

"The Council also do not dispute that there are no vacant pitches on existing lawful sites"

85. The Council will need to resolve these inconsistent positions which undermine the GTAA and alleged vacancies.

86. In light of these comments, GPS, pending explanation from the Council, GPS taken the approach as set out above, and will treat 50% of the alleged vacant pitches as such.

87. As above, the cited base date of the GTAA is not agreed and a base date of 31st December 2023 is considered more appropriate on the basis of the information provided in the GTAA.

88. GPS are aware of two grants of permission dated 8th February 2024 as follows:

- Land East of Plot 5, Moor Drove – reference APP/W0530/W/23/3322128 (Appendix C10) – 6 pitches
- Land East of Plot 2, Moor Drove reference APP/W0530/W/23/3322128 (Appendix C10) – 3 pitches

89. The appeal decisions confirm that as at the time of the decision the proposed occupants were living on the site. Using GPS' base date, the occupants of these sites were unauthorised.
90. Due to the lack of detail in the GTAA as to specific sites in the District, GPS' assessment is proceeding on the authorised households' figure as in the GTAA, adjusted to reflect the above critiques. If the GTAA base date is used, these households were authorised. However, given the absence of any list of sites, it is unclear if the GTAA even took these permissions into account and there is no way to for GPS to check. GPS proceed on the basis that these permissions were not taken into account within the GTAA, given the fieldwork had already been completed by the date of the permission and treat them as unauthorised. If the Council can evidence this is incorrect, GPS will amend the authorised household figure accordingly to remove any potential double counting.
91. GPS therefore proceed based on **272 authorised pitches occupied by 255 authorised households**. These figures exclude the 70 pitches purportedly occupied by non gypsy and traveller households, some of whom, as above, may ought to now be included in the assessment.

Unauthorised Households

92. An unauthorised pitch is a household that is currently living on a site (either which they own or with permission of the owner) without planning permission. This is different from unauthorised encampments which arise when a household is living on a site that they do not own without planning permission and without permission of the landowner.
93. The GTAA, at Table 7.1 identifies no households on unauthorised sites. However, inclusion is made elsewhere for sites with lapsed planning permission and sites where planning permission is pending. The households on these sites total 13. It is assumed that these sites include the households on the appeal site, though clarification is requested. Whilst in relation to the sites with lapsed planning permission, there is an argument that the occupancy is a breach of condition, both of these types of sites should, for the purposes of any needs assessment be identified as unauthorised, having either no planning permission,

or the potential of enforcement action; seeking to present them as otherwise, is deceptive on the part of the Council.

94. In addition to the above, Table 4.5 identifies that there was an unauthorised site, yet no household has been identified as living at this site, with the pitch allegedly being vacant. Similarly, two vacancies are identified on sites where planning permission was considered to be pending. It is unclear, in relation to these sites, how there can be a vacant pitch where no permission exists. If there were a vacancy, the site would not exist. GPS reject the alleged vacancies increasing the number of unauthorised households to 14 based on the information in the GTAA.
95. The 2016 GTAA identified three unauthorised sites. It is unclear if the unauthorised site included in the GTAA is one of those sites or not, identifying a further difficulty with the lack of detail in the GTAA.
96. One of the sites referenced in the 2016 GTAA, Cuckoo Lane, benefits from permission for two pitches (Appendix C19), which it is assumed are included in the GTAA's authorised figures. However, a Google Earth image from the site, shows occupation by at least two additional caravans in June 2023, i.e. around the time of the fieldwork. On the basis of two caravans to a pitch, this is indicative of at least one additional unauthorised household.



97. Given the unauthorised site referred to in the GTAA was purportedly vacant it is reasonably assumed this site was not Cuckoo Lane and therefore that the GTAA failed to take into account the additional unauthorised household on this site.
98. Unfortunately, Google Earth imagery does not exist around the base date for the two other unauthorised sites referenced in the 2016 GTAA. The Council will therefore need to confirm the position in relation to those sites and whether they have been incorrectly omitted from the GTAA.
99. Furthermore, it is clear that other unauthorised pitches were missed. As above, the GTAA includes sites where planning permission is pending which should correctly be treated as unauthorised. The households on these sites total 11. It is assumed that these sites include at least 9 households on the appeal site given the terms of the application sought. If this is not the case, it is clear that the households on the appeal site have been omitted from the

GTAA, despite being on site as at the base date. Based on the above assumption being correct, there would be just two other households where planning permission was pending. This could either be via a planning application, appeal or ground (a) appeal in Enforcement Proceedings, the GTAA not providing clarity.

100. However, the **Frankham** appeal decision concerns an Enforcement Notice issued on 1 November 2023 (within the fieldwork window). This appeal was determined post base date. The Enforcement Notice alleged “a) *Without planning permission, the change of use of the land from Agricultural to a Residential Caravan Site, b) The Laying of Hardstanding*”. The Enforcement Notice was appealed on Ground A.

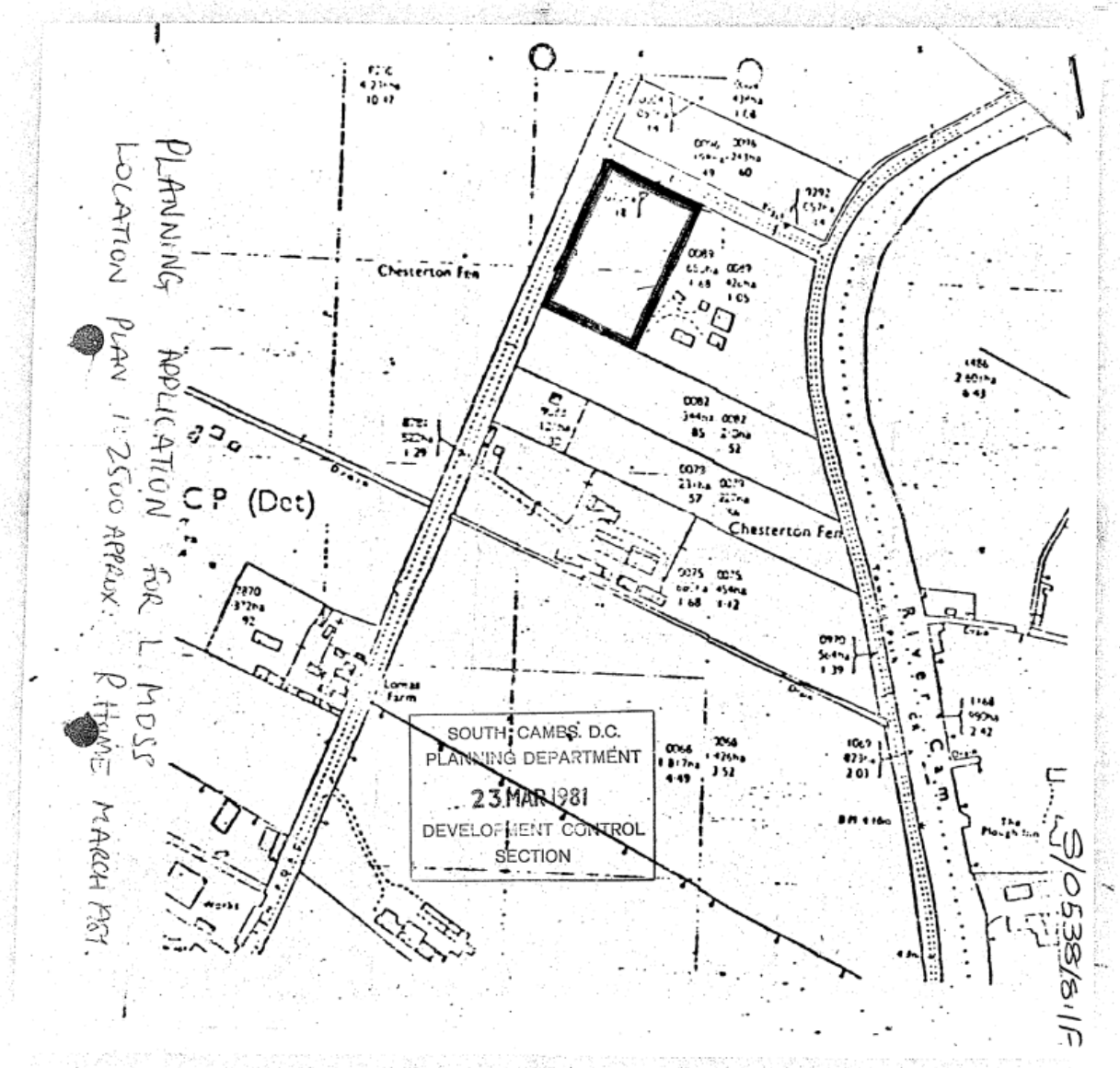
101. The **Frankham** Appeal Decision explains:

“Initially a single site called Grassy Corner, granted permission for use as a caravan site in 1982, it appears to have been subdivided some time between 1985 and 1990 and is now in 3 separate titles. A central area retains the name Grassy Corner, the northern section is Clearview and the southern section Greenacres. All three have separate accesses from Chesterton Fen Road. The notice as issued concerns the land between the established Grassy Corner caravan site and the River Cam.....In total there are about 35 caravans now stationed on the Grassy Corner site as extended, 11 on the original site and the remainder on the land between that and the boundary with the River Cam towpath.”

102. The Inspector at paragraph 9 provides a description of the planning history of the site as follows:

“The key permissions are one granted on appeal¹ in 1982 for 3 gypsy/traveller pitches with a maximum of 6 caravans. An application for a Gypsy caravan site for the stationing of 15 caravans was granted permission² in 1983, and a further permission³ for 19 caravans in 1985. Permission⁴ was then granted in 1986 for a seven bay caravan site at Greenacres. All of these permissions were confined to the land, or part of the land in the case of Greenacres, originally granted permission in 1981.”

103. The referenced location plan is replicated below.





105. In accordance with the approach taken in **Frankham** as to permitted pitches, indeed given that the Council subsequently enforced against this occupancy in **Frankham**, these pitches are unauthorised yet have been omitted from the GTAA.

106. There is reference in **Frankham** to the development being for occupancy of “*Gypsies and Travellers, and for Ukrainian refugees and for asylum seekers*” which could explain the omission if no occupancy of those fitting the PPTS definition was ongoing as at the base date. However, this is not made clear in the GTAA and evidence to support this would be required. Pending disclosure of such, GPS consider at least 16 unauthorised pitches should be included at this site.

107. It is also clear that other sites have been missed by the GTAA including the below:

The Old Coal Yard

108. Land referred to as the Old Coal Yard was subject to an application in 2024 for Change of use of amenity land to caravan site (18 units) together with associated landscaping and environmental works (part retrospective) (reference 24/02627/FUL), the decision notice,

officer's report and location plan for which are at Appendix C11. The Officer's report confirms that the site *"currently comprises 20 mobile home units on a hard surfaced gravel area and a hard surfaced tarmac access with fences and a gate"* and that *"The development is to meet an urgent unmet need for additional caravan sites, in particular to meet the need of the gypsy and traveller community"*.

109. This application followed the issue of and unsuccessful challenge to an Enforcement Notice, EN/00216/21, which alleged the change of use of agricultural land to caravan site (20 caravans) and laying of hardstanding and included the application site. A copy of the appeal decision is at Appendix C12.

110. The below Google Earth image indicates the site in June 2023; during the fieldwork window.



111. It is reasonable to conclude, considering the image and the planning history for the site that it was occupied, yet unauthorised as at the base date yet these 18 pitches are not included in the GTAA.

112. Given the reference in the subsequent planning documents to the site being for gypsy and traveller use, it is reasonable to assume the occupation was the same and as such those 18 pitches should have been included.

113. Furthermore, both The Old Coal Yard, and the Grassy Corner extension are located in the area referred to as Chesterton Fen indicated below on the Google Earth image. This area includes numerous caravan parks, including gypsy and traveller sites.



114. The above analysis has considered just two of those sites and identified 34 potential unauthorised gypsy and traveller pitches across those two sites. The GTAA in failing to disclose data of the sites considered provide no reason for these pitches to be excluded from this analysis. Further, GPS contend that if all sites were considered, this number would increase.

115. As above, GPS are also aware of two grants of permission dated 8th February 2024 as follows:

- Land East of Plot 5, Moor Drove – reference APP/W0530/W/23/3322128 (Appendix C10) – 6 pitches
- Land East of Plot 2, Moor Drove reference APP/W0530/W/23/3322128 (Appendix C10) – 3 pitches

116. The appeal decisions confirm that as at the time of the decision the proposed occupants were living on the site. Using GPS' base date, the occupants of these sites were unauthorised and are treated as such herein, resulting in an additional nine unauthorised households.

117. GPS therefore proceed on the basis of at least **57 unauthorised households** but consider this figure could be considerably higher.

Concealed Households

118. Concealed households are adult individuals or couples or families living within the accommodation of another family, usually but not exclusively a related household. Accurately identifying these concealed households is important as they are in immediate need of a pitch of their own and they also form part of the total of the families at the base date of the assessment from which future family growth is calculated.

119. It is claimed that 238 of the pitches identified by Arc⁴ are occupied by 243 gypsy and traveller households. Thus, there is evidence on the GTAA's own figures of at least 5 concealed or doubled up households. Despite this there is no express reference to concealed households save for within the fieldwork questionnaire at Appendix A where it states:

"No. concealed households"

120. The GTAA it seems, relies on the households to identify themselves as concealed. It is not clear if the interviewer would have explained what was meant by concealed households for the purposes of the fieldwork or in any event, what definition of concealed household was applied even where the interviewer did exercise judgment. This could clearly result in omissions.

121. It is believed (from cross-examination of an Arc⁴ representative at a public inquiry in another LPA) that the 'emerging households within the first 5 years' at table 7.1 includes concealed households. This was clarified within the relevant Council's evidence in a previous Appeal (Appendix C13) by Dr. Bullock that *"emerging households identified as ready to emerge could reasonably be termed concealed (or hidden) households."*
122. It seems likely that such an approach has taken place within this GTAA. The GTAA at Table 7.1 finds 3.3 emerging households which are currently on site and planning to live at the same site and 39.9 households on sites planning to live on another site in the District.
123. However, without further details it is impossible to extrapolate the number of concealed households the GTAA identified from the number of emerging households within the GTAA. This approach conflates two separate groups of households, whose needs ought to be considered separately.
124. It is claimed that 238 of the pitches identified by Arc⁴ are occupied by 243 gypsy and traveller households. Thus, there is evidence on the GTAA's own figures of at least five concealed or doubled up households were identified.
125. The GTAA claims a response rate of 61.5%, this is based on data for 177 households being obtained out of a total of 288 households. Thus at least five concealed or doubled up households were identified from 177 i.e in 2.82% of households surveyed or for whom data was obtained. Extrapolating this across the 288 households identified in the GTAA, would result in at least eight concealed households.
126. Given the absence of any further information in relation to concealed households, GPS proceed on the basis of **eight concealed households** as at the base date. However, it was extremely likely that significantly more concealed households were present in the district at the base date.
127. The lack of proper consideration of concealed households in the GTAA is concerning. It has to be hoped that the demographic method used for establishing the emerging need in the first five years has adequately accounted for concealed households.

Doubling-up

128. Doubling up is where a pitch intended for one family is also occupied by one or more additional families occupying their own caravans, usually touring caravans. Doubling up is the most common way that gypsy and traveller families without permanent bases manage to exist. Often, they can only stay on a site for a few weeks or months and their occupation is often in breach of conditions attached to the planning permission for that pitch. Each family doubled up is in immediate need of a pitch of their own and they also form part of the total of the families at the base date of the assessment from which future family growth is calculated. In Green Planning Studio's experience many young gypsies and travellers travel around doubling up on friends and families' pitches, on both privately and council owned sites. In our opinion it is therefore highly probable that there would be an underestimation, even in the GTAA of doubling up occurring within the county.

129. As with concealed households there is no express reference to doubled up households save for within the fieldwork questionnaire at Appendix A where it states:

"No. doubled up households"

130. The GTAA it seems, relies on the households to identify themselves as doubled up. It is not clear if the interviewer would have explained what was meant by doubled up households for the purposes of the fieldwork. This could clearly result in omissions.

131. Given the lack of proper information conveyed in the GTAA, it is impossible for GPS to properly assess the correct number of doubled-up households in the District, as there is no way to determine whether the households identified are in fact emerging, concealed or doubled-up. It is our position that if explored the figure for doubled-up households would be significant.

Conclusion on households living in caravans in the District as at the base date

132. Adjusting the figures for the sites considered there was a need for at least 352 households at the base date from those living in caravans. This is broken down into the following component households:

- On public authorised pitches 32
- On permanently authorised private pitches 255
- On unauthorised pitches 57 (at least)
- Concealed households 8 (at least)

133. As above, this excludes any of the “non traveller” gypsy and traveller households, whom, it considered the GTAA will now need to reassess.

134. The actual number of households and the actual level of need in the District is likely to be higher.

Hidden Need

135. Hidden need takes the form of households living in bricks and mortar accommodation for whom living in bricks and mortar is an inappropriate form of housing due to a cultural aversion to bricks and mortar. As a consequence, they need to move back to a pitch and out of bricks and mortar.
136. Households living in hidden need can also contain concealed households who are also in hidden need.
137. Some households emerge from bricks and mortar. This is where a child becoming an adult wants to adopt their cultural lifestyle even if their parents are happy living in bricks and mortar.
138. Table 7.1 allows for 4.4 households planning to move from bricks and mortar onto a site.
139. The executive summary confirms that no interviews were undertaken with households in bricks and mortar. The GTAA's approach is based on the 2021 Census estimating 164 gypsy and traveller households in South Cambridgeshire, 50.5% of whom are estimated to live in Bricks and mortar. The GTAA states:
- "For households currently in bricks and mortar, based on national arc4 studies it is estimated that 5.3% of households living in bricks and mortar would prefer to live on a site which would equate to 4.4 households. However, there was little evidence of households actually moving from bricks and mortar to a site in the past 5 years. The 5.3% figure is based on 281 interviews conducted nationally by arc4 from households living in bricks and mortar accommodation."*
140. No details of those studies have been provided with the GTAA for further scrutiny. The GTAA's calculation of 4.4 households is therefore predicated on unpublished studies and

the 2021 census figures. Further, this approach assumes that all households are identified within the Census figures, which is clearly not the case.

141. GPS Ltd believe that the lack of research into and engagement with households living in bricks and mortar will have led to an underestimation of the need in all areas.
142. GPS Ltd uses a multiplier of 3.62 times the number of households in caravans, to establish an approximation for the number of gypsy and traveller households in housing. We use this figure as the 2011 census indicates that for every gypsy and traveller living in a caravan in the UK, 3.62 will be living in bricks and mortar.
143. GPS Ltd has identified a total of 355 gypsy and traveller households in the area living in caravans applying the national multiplier of 3.62 to that figure will result in 1,274 households in bricks and mortar. Alternatively, as the Census data for South Cambridgeshire suggest 50.5% of households live in bricks and mortar, applying that ratio to the identified number of households living in caravans results in an estimated 362 households in bricks and mortar. Taking a conservative approach GPS will use the lower figure.
144. Other GTAA's have found an equivalent between 5 – 10% of the base date in hidden need. In the absence of other data, we would use 5%. This would suggest immediate hidden need to be at least **18 households**.
145. The underestimation in the GTAA will also have resulted in an underestimation in the base date numbers from which emerging households will need to be calculated. The households in hidden need should be added to the base date household numbers.
146. The underestimation in the GTAA will also have resulted in an underestimation in the base date numbers from which emerging households will need to be calculated. The households in hidden need should be added to the base date household numbers.

Conclusion on base date figures for those in hidden need and caravans.

147. Green Planning Studio has concluded on the information available to us that there was a need for 370 households at the base date:

- | | |
|---|---------------|
| • On public authorised pitches | 32 |
| • On permanently authorised private pitches | 255 |
| • On unauthorised pitches | 57 (at least) |
| • Concealed households | 8 (at least) |
| • Hidden Need | 18 |

148. As above, this excludes any of the “non traveller” gypsy and traveller households, whom, it considered the GTAA will now need to reassess.

149. The actual number of households and the actual level of need in the District is likely to be higher.

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Emerging Need

In migration

150. The GTAA, at Table 7.1, Limb 3g includes 19.5 households as in migration. Paragraph 7.15 of the GTAA details;

“The in-migration allowance is based on the number of households who have moved onto a pitch in the past 5 years and originated from outside South Cambridgeshire. Regarding movement into and out of the study area, the household survey identified 12 (unweighted) households who had moved into South Cambridgeshire. Of these households 3 had moved either from Cambridge or from elsewhere in the East of England; 2 had moved from elsewhere in England; 3 from Scotland, 2 from Ireland and 2 had been travelling generally.”

151. The data relied upon is not included within the GTAA, preventing detailed scrutiny. It is further unclear how the figure of 12 households whom are considered to have moved into the area is, for the purposes of the GTAA, extrapolated to the relied upon figure of 19.5 households.

152. If inward migration is to be taken into account, it is also necessary to look to a corresponding outward migration figure and vice versa. Failure to do so is a very poor methodological approach as will be set out below.

153. Table 7.1 at Limbs 3c and 3d includes 4.9 households moving from site to bricks and mortar in this or another district and at limb 4c 1.6 households planning to live outside the district. There is no explanation of to which sites these figures relate. Further, there is no evidence provided to support the out – migration figures claimed.

154. No figure for outmigration or turnover is included beyond the first year period. However, Table 7.3 includes in migration figures for the remainder of the plan period. Failure to include corresponding in and out migration figures is a poor methodological approach.

155. Accordingly, GPS make no allowance for such within this assessment.

156. However, if the Council wish to maintain the position that in migration be included and the Inspector is of the same view, the figure of **20 households** (rounded from 19.5) in the first five-year period and the further in migration statistics as detailed below are accepted.

Table 7.3 Future pitch requirements based on longer-term migration assumptions for South Cambridgeshire.

Time period	Number of in-migrant households
2028/29 to 2032/33 (5 years)	20
2033/34 to 2037/38 (5 years)	20
2038/39 to 2040/41 (3 years)	12
Total (2028/29 to 2040/41) (13 years)	52

Growth Rate

157. Growth Rate is the rate at which new family units emerge over time, either as a result of teenage children becoming adults and forming single or two-person family units; a result of family breakdown, i.e. two adult families splitting to form two family units or teenage children becoming adults and moving from bricks and mortar to a pitch. This matters, as it identifies the emerging need going forward from the base date. If the figure is too low, then the gap between provision and demand will widen over time.
158. The GTAA uses survey information and demographics to assess the numbers of emerging households in the first five-year period.
159. Limb 4b of Table 7.1 includes 39.9 households in this category, which as above, is considered likely to also include the concealed households identified by Arc⁴ if, as GPS considers possible, the number of concealed households were significant, this may have the effect that the household growth figures for the first five year period are not robust. As the GTAA is unclear and fails to address concealed households as a separate category, it is not possible for GPS to extrapolate further without clarification from the Council or Arc⁴.
160. Paragraph 7.18 sets down that in calculating these figures, the 2 GTAA includes over 18 who have specified that they want to form a new household but not those who do not have this desire.

“If young people aged 18 and over were living with family and have not specified that they want to form a new household, this is assumed to be through choice and the model does not assume they want to form a new household. The model however does factor in need from 13- to 17-year-olds who are likely to emerge in the next 5 years but had not indicated this on the household survey.”

161. Table 7.2 goes on to identify through analysis of the demographic make-up identified by the surveys the likely growth of households in the following periods on the assumption that 50% of children will require a pitch in South Cambridgeshire. These are identified as follows:

- 2028/29 to 2032/33 37 households forming
- 2033/34 to 2037/38 30 households forming
- 2038/39 to 2040/41 22 households forming

162. The use of demographic information, obtained through interviews which is then adjusted for those not interviewed, is a perfectly valid approach, however, it is reliant on the accuracy of the number of families at the base date, as any other modelling method. It has already been shown above that a number of households have been omitted from the survey data which will impact not only the base date figures but also any emerging households.

163. GPS use the age data in the 2011 census to provide household growth figures when demographic data is not available. Shortly, and possibly before this appeal is heard, this data will be remodeled additionally using the 2021 Census Data.

164. GPS' knowledge of gypsy and travellers' families across England and Wales is that generally children are being born with mothers at a fairly young age (typically 18-25). Without a reliable input of generation repeat rate any model is likely to have a fairly low probability of being accurate. For a more accurate figure in regards to household formation rates, the following factors would need to be known or modelled: the overall rate of pairing taking place each year amongst young family households, the extent of single adult households as opposed to two adult households, the number of adults that were dependent, the rate at which family breakdown was occurring and the rate at which where family breakdown has taken place where a new two person household was

forming. In practice the actual number of households in the census data will be higher and the newly forming households per annum will also be higher.

165. The household growth rate is the rate at which the number of households increase. This is a net figure of household formation less household dissolution. This figure is different from population growth rate. This is rate of increase in the size of population. GPS argue that to more accurately model population growth you also need to know when women have children on average, as the younger women have children on average would lead to a higher growth rate.

166. The number of households created 50 years ago would be significantly less than those being created now. Given historically high birth rates and the higher number of children being born per gypsy and traveller woman 50 years ago, the difference of a factor of 4 is likely to be broadly justified. It cannot be (and is not) the case that there are the same percentage of gypsies and travellers living aged 70 as there are aged 20. As the proportion of adults in the population increase then the number of households per population increases. When this is changing as in the gypsy and traveller population, the household growth rate will inevitably be higher than the population growth rate.

167. A worked example of household growth rate is set out at Table 1 (appendix C14). What should be drawn from this is that household growth rates should decrease over time. It should be noted that GPS' methodology to calculate household growth cannot be modelled beyond 2031. Therefore, the GTAA will be analysed using this period and not when the plan period ends.

168. As a result, GPS recommend the following 5-year household formation rates;

- 2023 – 2028 9.90%
- 2028 – 2031 5.61%

169. These are obtained by multiplying each 5-year model figures by a factor of 1.05 to account for the increasing trend towards fewer adults per households, primarily as a function of relationship breakdown.

170. Applying the above figures, the number of emerging families in the district based on 362 households within district at the base date would equate to the following additional households being formed:

- 2023 – 2028 36 households
- 2028 – 2031 22 households

171. A similar rate of growth for the period 2031-2033 as in the preceding years would be expected, equating to an additional 15 households to 2033 and a total of 37 households in the period 2028 - 2033.

172. The identified growth of 36 households (excluding concealed households) in the period 2023 – 2028 is compared to the GTAA's growth of 39.9 households, which appears to include concealed households.

173. Taking into account the emerging growth on GPS' figures by 2028 there should be a minimum of 398 pitches in the District and by 2033, 435 pitches.

174. The Inquiry in this appeal is due to be heard in 2025; the appropriate period for consideration is therefore 2025 – 2030. On this basis the figure for the purposes of establishing a five-year supply figure is 412 pitches.

175. However, if the Council wish to maintain the position that in migration be included and the Inspector is of the same view, these calculations will need to be adjusted to allow for growth from those incoming households.

SUPPLY

176. The above analysis considering, the alleged vacancies and occupation by non gypsy and travellers, identifies 304 pitches with permanent planning permission as potential supply as at the base date.

Post base date supply

Outmigration

177. Table 7.1 at Limbs 3c and 3d includes 4.9 households moving from site to bricks and mortar in this or another district and at limb 4c 1.6 households planning to live outside the district. There is no explanation of to which sites these figures relate. Given the scale of the errors identified with respect to hidden need, there is no evidence to support the figures claimed by the GTAA, which are therefore rejected.

178. No figure for outmigration or turnover is included beyond the first year period. However, Table 7.3 includes in migration figures for the remainder of the plan period. Failure to include corresponding in and out migration figures is a poor methodological approach. This mistake was common in the first tranche of GTAA undertaken between 2005 and 2008. The methodological flaw was not spotted until after the East of England RSS was completed but was being corrected by Inspectors while completing the South East RSS and North West RSS before work on them was stopped by government. It is now relatively rare for this mistake to be made.

179. As it stands, beyond the first five-year period, the GTAA is taking into account those moving to the area, but not those leaving it. This is a fundamental flaw.

180. In line with the approach set out in relation to in migration, GPS consider that neither ought to be included

Permissions granted since the base date.

181. As above a base date of 31 March 2024 is claimed which is not agreed. GPS instead use the base date of 31st December 2023.

182. GPS have identified the following grants of permission since the base date:

- The Piggery, Haden Way – Reference 24/01326/FUL (Appendix C16) – Net 7 pitches: 8 pitches granted, but permission for 1 already existed pursuant to S/2442/19/FL.
- Everetts Field – Reference 22/04940/FUL (Appendix C17) – 5 caravans including 2 statics – 3 pitches
- Land East of Plot 5, Moor Drove – reference APP/W0530/W/23/3322128 (Appendix C10) – 6 pitches
- Land East of Plot 2, Moor Drove – reference APP/W0530/W/23/3322128 (Appendix C10) - 3 pitches

183. This brings the total supply figure to 320 pitches.

Conclusion on need

184. The GTAA cannot be considered a robust evidence base to inform the Council in their policy-making.
185. The GTAA fails to justify its conclusions by omitting site information. Further, there are a number of errors identified in the methodology of the GTAA which will have resulted in a significant underestimation in the level of need in the District; the failure to accurately identify households that were doubled up/concealed/overcrowded, and the failure to establish an accurate number of households in bricks and mortar wishing to move to sites. These will have resulted in the recorded base date figure being too low. This will have also resulted in the calculation of future family growth being too low.
186. Adjusting the figures in accordance with the conclusions above, Green Planning Studio identified a need for 362 households as at the base date. To be offset against this is a supply of 304 pitches: an immediate need as at the base date of 58 pitches.
187. Taking into account the emerging growth on GPS' figures by 2028 there should be a minimum of 398 pitches in the District and by 2033, 435 pitches.
188. The Inquiry in this appeal is due to be heard in 2025; the appropriate period for consideration is therefore 2025 – 2030. On this basis the figure for the purposes of establishing a five-year supply figure is 412 pitches.
189. Set against this is the supply figure of 323 pitches, resulting in a five-year supply figure of 89 pitches.
190. However, if the Council wish to maintain the position that in migration be included and the Inspector is of the same view, this figure will increase further.

191. As the Council is working to too low a figure in its site allocations, it is Green Planning Studio's opinion that they fail to meet the actual need for sites in the District.

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Appendices C

1. Accommodation Needs Assessment of Gypsies, Travellers, Travelling Showpeople and Bargee Travellers and other caravan and houseboat dwellers for South Cambridgeshire District and Cambridge City Councils dated September 2024 by Arc⁴
2. Appeal Decision reference APP/W0530/C/23/3333088 **Frankham** and others v South Cambridgeshire Council dated 9th December 2024
3. Court of Appeal Decision **Lisa Smith** v Secretary of State [2022] EWCA Civ 1391
4. ONS Article: Gypsy or Irish Traveller Populations, England and Wales: Census 2021
5. Gypsy and Traveller population in England and the 2011 Census: An Irish Traveller
6. Office for National Statistics: What does the 2011 Census tell us about the characteristics of Gypsy or Irish Travellers in England and Wales, January 2014
7. Planning Resource – “A government consultation on Gypsies and Travellers is too focused on stronger enforcement at the expense of boosting site supply, according to practitioners” 12th April 2018
8. January and July 2024 Caravan Count for South Cambridgeshire
9. Cambridgeshire, Kings Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment, dated October 2016
10. Appeal Decision reference APP/W0530/W/23/3322128 **Price** v South Cambridgeshire District Council dated 8th February 2024
11. The Old Coal Yard, decision notice, officers report and location plan reference 24/02627/FUL
12. Appeal Decision reference *O'Connor v South Cambridgeshire District Council* dated 1 December 2023
13. Relevant extract of Dr Michael Bullock’s Rebuttal on behalf of Arc4, relating to application reference 14/21223/COU, dated 9th October 2015
14. GPS Table 1
15. GPS Table 2
16. The Piggery, Haden Way Decision Notice Reference 24/01326/FUL
17. Everetts Field Decision Notice Reference 22/04940/FUL
18. Census 2021 Data
19. Cuckoo Lane Decision Notice reference S/1758/14/FL