

PLANNING STATEMENT – UPDATED APRIL 2025

APPLICATION SITE:	LAND AT EAVES LANE, STOKE ON TRENT. ST2 8LY
PROPOSED DEVELOPMENT:	CHANGE OF USE OF LAND TO A 2 PITCH FAMILY GYPSY & TRAVELLER SITE – RETROSPECTIVE – RESUBMISSION OF PLANNING APPLCIATION SMD/2024/0486
APPLICANT:	MR P QUINN
PLANNING AGENT:	MR MIKE CARR MSc MRTPI – MAT DESIGN LIMITED

1. INTRODUCTION

This Planning Statement has been prepared to accompany the planning application for a 2-pitch gypsy and traveller family site, day room and boundary treatment and semi-permeable surface (retrospective), within the jurisdiction of Staffordshire Moorlands Council. The application is a resubmission of planning application SMD/2024/0486, which was refused by the Local Planning Authority on 23/12/2024, some 11 days after substantial changes were made to the National Planning Policy Framework (NPPF) and the Planning Policy for Traveller Sites (PPTS).

In addition, further national planning guidance relating to “advice on the role of the Green Belt in the planning system” was introduced to the National Planning Practice Guidance on 27/2/2025, which provides the most up to date guidance on how LPA’s and developers should assess the concept of grey belt land, which was introduced to the NPPF in December 2024. A link to that guidance is added below

<https://www.gov.uk/guidance/green-belt>

Further to the above, whilst we recognise that the guidance relating to the “advice on the role of the Green Belt in the planning system” was only introduced in February, the material changes to the NPPF were made prior to the issue of the refusal notice. We do not consider that the LPA properly took account of those changes in national planning policy, which clearly and demonstrably outweigh the provisions of the Staffordshire Moorlands Local Plan. This is particularly so when the proposed development for a family Gypsy and Traveller site is considered.

2. MATERIAL CHANGES IN PLANNING GUIDANCE – GREY BELT LAND

When the LPA prepared the case officer report, we consider that they failed to properly and fully assess the following areas of national planning policy:

- The status of the land as grey belt and the specific guidance in relation to NPPF paragraph 155.

The most up to date planning guidance (Advice on the role of the Green Belt in the planning system), following the introduction of the Grey Belt Land concept into the 2024 NPPF, was introduced by Government into the NPPG on 27/2/2025.

This advice, for purposes attached to the consideration of this planning application, provides both developers and the LPA on how the contribution land should make to the relevant Green Belt purposes be assessed, assessing whether land is grey belt, how Green Belt assessments be used in the development management process and in what circumstances should proposals on grey belt land be approved.

In making an objective assessment regarding how the contribution land should make to the relevant Green Belt purposes be assessed, NPPG Paragraph: 005 Reference ID: 64-005-20250225 provides the most up to date guidance to allow LPA's and developers to make a reasonable assessment. In this case, when the setting of the site in the locality is objectively considered, a reasonable judgement of the contribution of the land to the green belt is as follows:

Purpose A – to check the unrestricted sprawl of large built-up areas. This site at Eaves Lane is assessed as having no contribution to the green belt because the site is not adjacent to or near to a large built-up area,

Purpose B – to prevent neighbouring towns merging into one another. This site at Eaves Lane is assessed as having a weak contribution to the green belt. Whilst it could be argued that the site does form part of a gap between towns, the site is only a very small part of this gap, and does not contribute to visual separation between towns,

Purpose D – to preserve the setting and special character of historic towns. This site at Eaves Lane is assessed as having no contribution to the green belt because the site is not part of the setting of a historic town.

Paragraph: 007 Reference ID: 64-007-20250225 the seeks to take this assessment further, for purposes in confirming that the land can reasonably be described as grey belt, in that after consideration of the above criteria, **any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land**, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.

Our conclusions are that the development site is grey belt land and is therefore not land that is restricted land set out in Footnote 7 of the NPPF.

3. PARAGRAPH 155 (FOOTNOTE 7) OF THE NPPF AND PARGAGRAPH 13 OF THE PPTS

Page 7 of the case officer report attached to the refusal of planning application SMD/2024/0486 confirms that the site is not considered to occupy a sustainable location, which we consider is contrary to the directions of NPPF Footnote 57 and the advice that is set out in PPTS paragraph 13. Para 13 tells LPA's they should ensure that traveller sites are sustainable economically, socially and environmentally. Distance and other matters that are referred to in the case officer report, do not form part of this guidance and we consider that this site is sustainable economically, socially and environmentally for the 8 reasons that are provided in the PPTS.

Page 7 also attached negative weight to the occupant's connections to schools and health services are confirmed in evidence as being around 10 miles away with the Stoke on Trent area. Since that time, and as set out in the personal circumstances statement, the applicant and his family have changed their health providers so that they are ore easy to access. This is important because of the medical conditions that affect the family, which we consider amount to Very Special Circumstances in this case.

4. THE PPTS ANNEX 1 DEFINITION AND PPTS PARAGRAPH 25(e)

Further amendments were made to the Annex 1 PPTS definition in December 2024, which changed the definition to read as follows:

- "For the purposes of this planning policy "gypsies and travellers" means: 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".
- The changes to the PPTS definition removed the following areas of determination:

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

These changes to the definition seek to ensure that ALL persons with a Gypsy and Traveller heritage can be positively considered under the provisions of the PPTS, and not disenfranchised for reasons such as living in bricks and mortar, which is a significant material planning consideration is such persons (such and Mr Quinn and his family) had been forced to live in bricks and mortar because Local Planning Authorities failed in the statutory responsibilities to positively plan for sites and pitch accommodation.

Taking these factors into account, PPTS paragraph 25 (e) reinforces the directions that LPAs should determine applications for sites from any travellers and not just those with local connections. Taking this into account, when the LPA refused planning SMD/2024/0486 the underlying text within the case officer report, sought to suggest the Mr Quinn and his family were not Gypsy or Travellers because they had lived (forced) in bricks and mortar, and that they accessed local services a few miles away from the development site.

We consider that such an approach conflicts with the direction set out in PPTS paragraph 25 (e) and fails to respect the provisions of the PPTS Annex 1 definition.

5. THE VERY SPECIAL CIRCUMSTANCES TEST AND PPTS PARAGRAPH

Paragraph 16 of the 2023 PPTS identified that:

- Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm to establish very special circumstances.

This was amended considerably in December 2024, with the new paragraph 16 reading as follows:

- Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development unless the exceptions set out in Chapter 13 of the National Planning Policy Framework apply.

Taking these changes into account and after considering the personal circumstances/medical circumstance submitted with the refused planning application, along with the failure of the LPA to properly plan for sites, not meeting and identified unmet need, the untidy and derelict nature of the previously developed land and the lack of and deliverable alternatives, the LPA failed to make any proper assessment of Very Special circumstances in this case, if in fact they are actually need given the changes made to the PPTS and NPPF in December 2024.

Furthermore, given that 2 children, both with medical conditions, live on the application site, the LPA comprehensively failed in its responsibilities to consider Very Special Circumstances, which they said in the decision notice that “There are **no** considerations that amount to ‘very special circumstances’ that clearly outweigh those harms”.

The decision in this case is substantially flawed for a variety of planning policy reasons, not least of which is the paramount importance of the best interests of the child, the provisions of the Human Rights Act 1998, The Equalities Act 2010 and the provisions of the LPA’s own Public Sector Equalities Duty, all of which are engaged for consideration in this case

6. THE APPLICATION SITE

The application site is a 0.31Ha parcel of previously developed land that and that is sustainably located (see NPPF footnote 57 and PPTS paragraph 13) to the east of the Stoke-On-Trent settlement boundary. It was made up of a large area of hard standing, 2 large storage buildings, a stable block and storage container. As we understand it, the site was used for the storage and sale of vehicle, evidence of which is shown on the aerial and street scene photographs that are submitted with this application. The land also include a stable building and storage container, both of which add to the conclusion that this land is previously developed and grey belt land.

We would also highlight that the applicant also owns a further 0.2Ha of land to the northwest of the application site, which is shown edged blue on the submitted location plan and is unaffected by this development.

In terms of the sites surrounds, these are made up of Eaves Lane that forms the sites eastern boundary from which vehicular and pedestrian access is taken, open fields to the north and west, whilst residential accommodation at Moorside Farm forms the sites southern boundary

Overall, given that the nearest settlement boundaries can be reasonably accessed, the development site is not isolated and is in a sustainable location given its proximity to local services, the highway network and to public transportation routes.

7. LAND USE ALLOCATION

The application site is identified as being within the green belt on the Staffordshire Moorlands Local Plan Proposals Map.

8. THE PROPOSALS FOR THE SITE

This planning application proposes the change of use of land to a 2-pitch gypsy and traveller family site, day room and boundary treatment and semi-permeable surface. The details of the proposed (to be completed) development are shown on the submitted plans. Given the site surface has been improved and that residential occupation has started, the planning application is retrospective.

To balance the impact of the development on the openness of the green belt, the proposed development would also include the removal of the 2 site storage buildings (not agricultural buildings), the stable building and storage container (not agricultural buildings), so that the resultant development would have no greater impact on the openness of the green belt than the existing development.

9. RELEVANT SITE PLANNING HISTORY AND PREVIOUSLY DEVELOPED LAND (PDL)

Planning application SMD/2024/0486 refused by the LPA on 23/12/2024

There is no other planning history available on the Local Planning Authorities web for the application site. However, we have prepared a series of aerial and street scene photographs of the site that confirms that the land is brownfield given that it has been previously developed.

Further to the above, the previous owner of the site has prepared a Statement of Truth to accompany this planning application, which will confirm that the application site was used for non-agricultural activities for a period in excess of 10 years, and that the 2 buildings that were erected on the site, we used continuously for non-agricultural activities associated with the use of the land.

The glossary to the NPPF set out that PDL is - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

The use of the land and buildings on the land are not excluded by the definition in the Glossary.

Taking this into account, our submission is made on the basis that this planning application is made substantially under the provisions of NPPG Section 13, paragraph 154(g), which the adopted Local Plan is silent on.

Effectively, paragraph 154(g) sets out that development in the green belt is not an inappropriate form of development if the proposed development involves the limited infilling or the partial or complete development of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.

The plans include footprint and volumetric calculations relating to the loss of the buildings and their replacement with the static homes, caravans and day room, whilst vehicular activity and storage that formed a large part of the previous use, will be substantially reduced. Any inspection of the site and the previous history would confirm that this evidence is robust.

Further to the above, paragraph 27 of the PPTS sets out that when considering applications, local planning authorities should attach weight to the (a) effective use of previously developed (brownfield), untidy or derelict land.

10. PLANS AND INFORMATION PRESENTED TO SUPPORT THIS PLANNING APPLICATION

The following plans and information are presented to support the consideration of this planning application:

- The site location plan,
- The existing and proposed site plan,
- The proposed site plans,
- Site aerial and street scene photographs,
- The personal circumstances statement,
- The planning statement and,
- The previous owner's Statement of Truth.

11. NATIONAL & LOCAL PLANNING POLICY APPLICABLE TO THIS PROPOSAL

There are three main policy documents attached for the consideration of planning applications received by the LPA. In this case, the policy framework is made up of the following documents:

- National Planning Policy Framework (NPPF 2024),
- The Planning Policy for Traveller Sites (PPTS) 2024,

- The Staffordshire Moorlands Local Plan – Adopted September 2020
- The Newcastle-under-Lyme, Stoke-on-Trent, Staffordshire Moorlands and Stafford Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2015

12. THE APPLICANT GYPSY/TRAVELLER STATUS

For purposes attached to the consideration of this planning application, the applicant, his family are gypsies and travellers, as defined in Annex 1 of the 2025 PPTS .

13. PERSONAL CIRCUMSTANCES OF THE FAMILY

In this case, the applicant and his family seek planning permission for settled site accommodation that would provide suitable accommodation (static & trailer caravans), which we consider would be in the interests of the children and the families well-being.

In terms of the health and personal conditions associated with the family group, this information is set out on a separate statement. The family information is private and confidential, but we can provide any additional medical evidence separately on request.

14. VERY SPECIAL CIRCUMSTANCES (VSC) ATTACHED TO THIS APPLCIATION (IF REQUIRED)

We do not consider that Very Special Circumstances are required in this case, given that there would be no material harm to the openness of the green belt in this location, given the previously developed nature of the site. However, we do think that it is essential that the LPA are fully aware of the families' personal circumstances and associated medical conditions that affect the family's health and well-being.

If the LPA conclude that the development is an inappropriate form of development, which we consider would be unreasonable to do so, then we would ask that the families VSC are weighted appropriately I the planning balance, including the best interests of the child.

Furthermore, if VSC are required, the below considerations should be weighted and placed into the planning balance with the weight that the carry. Some elements of the below material planning considerations must carry substantial weight, but when read together would clearly outweigh the harm caused by inappropriateness to the openness of the green belt.

15. THE GTAA AND NEED FOR SITE/PITCH ACCOMMODATION IN THE BOROUGH

The Gypsy and Traveller Accommodation Assessment for the Borough dates from 2015 and cannot be relied on to provide any sort of realistic or reasonable evidence on need within the Borough. Furthermore, and following

the Lisa Smith case, the PPTS definition has been amended twice since that decision, which has had a significant impact in terms of need and supply across the Country and we are no aware of any attempts being made by the Local Planning Authority to deal with this matter.

16. 5 YEAR SUPPLY AND UNMET NEED

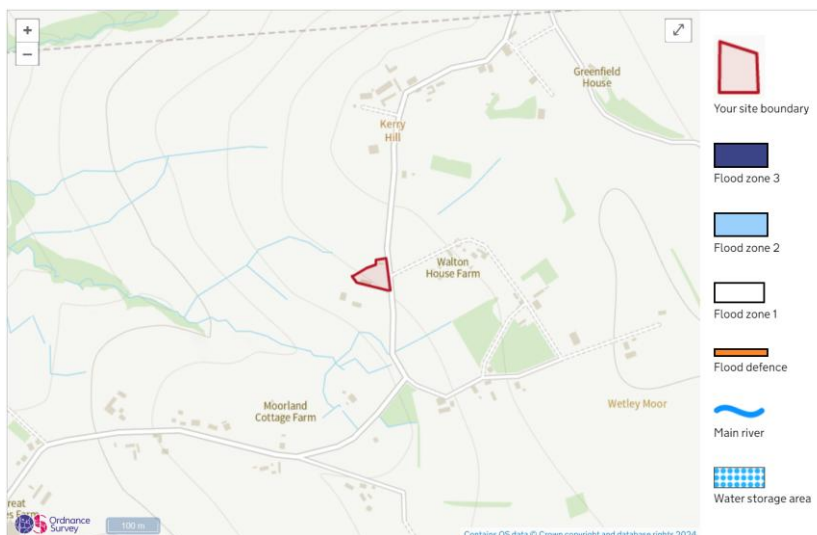
The LPA have confirmed that the does not currently have a 5 year supply of traveller sites, whilst there is also a demonstrable unmet need in the Borough.

17. AVAILABILITY OF ALTERNATIVE SITES

The family have sought alternative site/pitch accommodation which could provide them with accommodation and personal safety, whilst respecting the cultural needs and heritage of the family. None is available in the Staffordshire Moorlands Borough or the wider northeast region, meaning that the lack of alternative site provision also carries substantial weight in favour of this application.

18. FLOOD RISK

The Environment Agency's Flood Risk mapping system (see image below) shows it is at low risk of surface water flooding (Flood Zone 1). As such, and for the purposes of this planning application, there are no flood risk issues associated with the site.



Map source – The Environment Agency flood risk mapping service

19. VEHICULAR ACCESS

Paragraph 114 and 115 of the 2021 NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

In this case, the existing vehicular access provides a direct link onto Eaves Lane, which can be improved to provide suitable visibility splays that would mean that proposed access would not result in any adverse impacts on highway or pedestrian safety.

20. RESIDENTIAL AMENITY

The proposed use of the site is for use as a family traveller site, which in effect is a residential development. No commercial uses of the site are proposed through this planning application. Furthermore, the setting and position of the development site and propounded pitches, when considered against the location of existing residential accommodation in the area, means that there would be no impact on residential amenity.

21. STREET SCENE

The proposed development would not be harmful to the street scene, given the site's position in the locality.

22. BIODIVERSITY NET GAIN

This is a retrospective application meaning the provisions of legislation attached to the delivery of Biodiversity Net Gain.

However, and in the context of Biodiversity, paragraph 55 of the NPPF identifies that Local planning authorities should consider whether otherwise unacceptable development could be made acceptable by using conditions or planning obligations. The applicant would be happy to assist in providing planting and landscaping to the site which, subject to the LPA's decision, would help to further integrate this site into local landscape.

23. NATIONAL & LOCAL PLANNING POLICY ASSESSMENT

The National Planning Policy Framework (NPPF) is based on a presumption of sustainable development, as identified in Section 2 (Achieving sustainable development). The Government issued a separate Planning Policy for Traveller Sites document, which was revised in December 2024, which takes into account changes to the Gypsy and Traveller Annex 1 definition along with substantial changes to the policy directions given to LPA's so that Gypsy and Traveller applications must be considered positively, so as not to discriminate against the cultural needs of this group of people.

To confirm this, PPTS paragraph 3 confirms that 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. Local planning authorities should ensure that their Local Plan includes fair, realistic and inclusive policies.

We do not consider that the Staffordshire Moorlands Local Plan Framework, given that there is no GTAA, gives fair or equal consideration to the treatment for travellers in any way, when compared to the delivery of bricks and mortar housing for the settled population.

24. NPPF SECTION 5 (DELIVERING A SUFFICIENT SUPPLY OF HOMES)

Paragraph 61 of the NPPF 2024 advises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Furthermore, paragraph 63 sets out that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

The applicant and his family are travellers/gypsies would occupy the site are gypsies and Travellers within the meaning set out in Annexe 1 of the Planning Policy for Traveller Sites (PPTS), in that they are persons of nomadic habit travelling for the purposes of employment.

Taking this into account, the LPA's current position is that it does not have a 5-year supply of Gypsy and Traveller sites, which is a significant material factor in the consideration of this planning application. The alternative would be that the family is forced into further roadside encampments, which conflicts with the provisions set out in section 4 of the PPTS.

As such, we consider that the LPA must have failed in their statutory responsibilities to comply with the planning policy provisions of the 2012, 2018, 2021, both versions of the 2023 NPPF, 2024 and the PPTS in terms of the delivery of sites.

25. THE PROPOSED DEVELOPMENT - SPECIFIC PLANNING POLICIES

Local Plan Policy H4 (Gypsy and Traveller Sites and Sites for Travelling Showpeople) sets out that proposals for new Traveller and Travelling Showpeople sites or extensions to existing sites will be permitted provided that:

- Safe and convenient vehicular and pedestrian access to the site should be provided,
- The site must be large enough to provide for adequate on-site facilities for parking, storage, play and residential amenity,
- The site is reasonably accessible to shops, schools, health facilities and other community facilities on foot, by cycle or public transport,
- The site should not be detrimental to amenities of adjacent occupiers,
- Adequate levels of privacy and residential amenity for occupiers should be provided and sites should be 'soft' landscaped to positively enhance the environment and increase the site's openness rather than 'hard' landscaped,
- Sites or features of natural value should not be significantly harmed by the proposal,
- Development causing harm to heritage assets will need to be justified against NPPF Policy.
- Development of gypsy and traveller or travelling showpeople accommodation in the Green Belt will not be allowed unless there are very special circumstances.

We consider that the proposed development complies with all the provisions of the adopted Local Plan Policy. Furthermore, we have also set out, for various planning policy reasons, that VSC are not required in this case.

However, we would highlight that if VSC are required, then the VSC identified in this statement (but not limited to those VSC) would clearly outweigh any harm to the openness of the green belt in this case.

20. PLANNING CONCLUSIONS

In terms of the considerations which weigh in favour of the application, we consider that the site can reasonably be considered as Grey Belt Land, as set out in the Glossary to the NPPF, thereby meaning that the planning policy arguments that we have identified in Section 2 of this statement, provide substantial support to grant this planning application.

Furthermore, Sections 3, 4 and 5 provide further national planning policy advice on how the LPA should positively consider this planning application. We consider that, given the status of the land and the substantial changes made to the assessment of this type of planning application, it would be inconsistent with current national planning policy to refuse this planning application.

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In addition, we would also conclude that there is an unmet need in the Borough, which often results in unauthorised encampments and retrospective development, which is compounded year on year by the failure of the LPA to demonstrate a 5-year supply of sites, which it is required to do by both the NPPF and the PPTS.

This failure of policy unfairly prejudices the opportunities for Gypsy and Traveller people and conflicts with the Governments overarching aim 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.

The failure of planning policy in the Borough, must carry significant weight in favour of this application.

Further to the above, the GTAA does not provide up-to-date evidence base that the LPA can rely on to potentially dispute the need for pitch and transit accommodation in the borough. As such, and until such a time that there is an accurate GTAA in place and an acceptance by the LPA of the shortfall and their PSED responsibilities.

The mere fact that the applicant and his family no accommodation choices whatsoever in the Staffordshire Moorlands area, means that the LPA are unable to use reasonable evidence to plan positively and manage development in the borough, which is contrary to PPTS Policy A (Using Evidence).

The failure of a suitable evidence base must carry significant weight in favour of this application.

In terms of the personal circumstances of the family, they have no alternative or suitable accommodation that would support their cultural heritage and nomadic lifestyle. Furthermore, we consider that the needs of the family and their children are of primary importance in the decision-making process, so that they can have access to the same life chances and opportunities as those children in the settled community. Medical conditions attached to all of the family due to hereditary illness have been provide, which adds considerable weight to the needs of the family and a settled bas that meets their traditional heritage and lifestyle.

It is also clear that the proposals for this site represent a positive approach towards meeting the needs of the transitory traveller population, who do not have any realistic sites or opportunities to stop lawfully whilst travelling. This means that they are often forced to set up camp illegally on this side of the road or on public land. PPTS paragraph 4 (f) clearly tells us that that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments.

A grant of planning permission un this case, would reduce the numbers of unauthorised transit encampments, which weighs considerably in favour of the application.

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We also consider that the proposed development follows the Council’s own adopted planning policies relating to Traveller site development and developments that may affect the open countryside. In addition, the site is a sustainably located in terms of its proximity to Haswell and Peterlee and the surrounding transport network.

The National Policy for Traveller Sites make it clear that Human Rights are a consideration in the determination of gypsy and traveller proposals and again adds further weight to this application to assist in avoiding other unauthorised Gypsy and Traveller encampments in the District and the Council is urged to give full consideration giving approval to this site for the family and the proposed transit site accommodation.

As such, when all of the the above circumstances, which provide substantial support for the application, are weighted into the planning balance, we consider that the combination of these factors outweighs any other harm that may be identified by the Local Planning Authority.

Overall, when the proposals for the site are considered against the Framework as a whole, the PPTS and Local Plan Policy H4, we consider that this application is a sustainable form of development in this area of the Borough. We do not consider that VSC are required in this case, given the provisions of NPPF paragraph 155, However, if the LPA do conclude that there needs to be a VSC examination, we would highlight the material planning and personal circumstances submitted with this application, along with the revisions made to Policy E: Traveller sites in Green Belt paragraph 16.

If the LPA consider that they cannot grant a full planning permission following the planning balance, we must ask that a temporary planning permission is approved for a minimum period of 5 years, within which time the LPA may have carried out their statutory duties in terms of the identification and delivery of suitable and available sites across the Borough to meet the identified need.