



Epping Forest District Council Gypsy and Traveller Accommodation Assessment



Interim Briefing Note

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1. Introduction

- ^{1.1} The primary objective of the Epping Forest District Council Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust revised assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation for the period 2016-2033.
- ^{1.2} The primary reason for completing the Update was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes.
- ^{1.3} The study will provide an evidence base to enable the Council to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, and the Housing and Planning Act 2016. It also provides the evidence base which underwrites the Gypsy and Traveller Accommodation policy of the Epping Forest Local Plan 2011-2033.
- ^{1.4} The baseline date for the study is **May 2016**.
- ^{1.5} The purpose of this Interim Briefing Note is to provide Epping Forest District Council with an overview of the levels of need that were identified during the fieldwork that was completed between May and August 2016. It also provides the identified level of need for the period 2011-2033 to coincide with the Epping Forest Local Plan.

The 'Planning Definition' in PPTS

- ^{1.6} For the purposes of the planning system, the definition was changed in the revised PPTS. The new definition is set out in Annex 1 and states that:

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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

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.*

For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 1.7 The key change that was made to both definitions was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 1.8 One of the most important questions that GTAAs will need to address in terms of applying the new definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term '*nomadic*'.
- 1.9 **R v South Hams District Council (1994)** – defined Gypsies as "*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.
- 1.10 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 1.11 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 1.12 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.
- 1.13 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 1.14 It is ORS' understanding that the implication of these rulings in terms of applying the new definition is that it will **only include those who travel (or have ceased to travel temporarily) for work**

purposes and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will in the view of ORS **not cover** those who commute to work daily from a permanent place of residence.

- 1.15 It will also be the case in our view that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the new definition.
- 1.16 Households will also fall under the new definition if they can demonstrate that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to demonstrate that they have travelled in the past. In addition households may also have to demonstrate that they plan to travel again in the future.

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2. Methodology

Background

- ^{2.1} Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in August 2015 and the Housing and Planning Act in 2016, as well as responding to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- ^{2.2} The revised PPTS published in August 2015 contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the new definition for Gypsies, Travellers and Travelling Showpeople.
- ^{2.3} The approach currently used by ORS was considered in April 2016 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:
- 'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'*
- ^{2.4} The stages of the methodology that was used to complete this study are set out below. More information on each stage will be provided in the final report.
- » Desk-Based Review
 - » Survey of Travelling Communities
 - » Calculating Current and Future Need

3. New PPTS Definition

- ^{3.1} The primary change introduced by PPTS (2015) in relation to the assessment of need is the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the new definition. As the new PPTS has only recently been issued only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the new definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes to meet the new definition, and stay away from their usual place of residence when doing so.

Non-Travelling Households

- ^{3.2} Whilst households who do not travel fall outside the new definition of a Traveller, Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equalities Act 2010. In addition provisions set out in the new Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance¹ related to this section of the Housing and Planning Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the new ‘planning’ definition of a Traveller will need to be assessed as part of the wider housing needs of the area, for example through the SHMA process, and will form a subset of the wider need arising from households residing in caravans.

Unknown Households

- ^{3.3} As well as calculating need for households that meet the new ‘planning’ definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be assessed as part of the GTAA where they are believed to be ethnic Gypsies and Travellers who **may** meet the new definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed, an approach has been taken that seeks an estimate of potential need from these households. This will be a maximum additional need figure over and above the need identified for households that do meet the new definition.
- ^{3.4} The estimate seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent

¹ “Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats.” (March 2016)

with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).

- 3.5 Should further information be made available to the Council that will allow for the new definition to be applied, these households could either form a confirmed component of need to be included in the GTAA or the SHMA.
- 3.6 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the new definition based on the outcomes of households where an interview was completed. However, data that has been collected from over 1,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of households who have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition. This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through the SHMA.
- 3.7 Councils will need to carefully consider how to address the needs associated with ‘Unknown’ Travellers in Local Plan policies as it is unlikely that all of this need will need to be addressed through the provision of Gypsy or Traveller pitches. In terms of Local Plan policies the Councils could consider the use of a specific site allocation/protection/intensification/expansion policy for those households that do meet the new definition, together with a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that they meet the definition.

Applying the New Definition

- 3.8 When the household survey was completed the outcomes from the questions on travelling were used to determine the status of each household against the new definition in PPTS. The same definition issue applies to Travelling Showpeople as to Gypsies and Travellers. Households that need to be considered in the GTAA fall under one of 3 classifications that will determine whether their housing needs will need to be assessed in the GTAA. Only those households that meet, or may meet, the new definition will form the components of need to be included in the GTAA. Whilst the needs of those households that do not meet the new definition do not need to be included in the GTAA, they will be assessed to provide the Council with components of need to consider as part of the SHMA.
- » Households that travel under the new definition.
 - » Households that have ceased to travel under the new definition.
 - » Households where an interview was not possible who may fall under the new definition.

4. Survey of Travellers

Interviews with Gypsies, Travellers and Travelling Showpeople

- 4.1 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living in Epping Forest.
- 4.2 Through the desk-based research ORS identified 1 public site (16 pitches), 38 private sites (105 pitches), 8 sites with temporary permission (15 pitches) and 5 unauthorised sites (6 pitches). In addition 1 Travelling Showpeople yard was identified (9 plots). Interviews were completed between May and August 2016. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below sets out the number of pitches, the number of interviews that were completed, and the reasons why interviews were not completed.

Public Sites	Pitches/Plots	Interviews	Reasons for not completing interviews
Hop Gardens, Toothill	16	4	11 x non-Travellers, 1 x TSP ²
Private Sites			
Carrisbrook	1	0	Site inaccessible ³
Downshoppitt	4	3	1 x refusal
Green Acres	1	1	-
Greenleaves	15	2	5 x pitches not there, 4 x vacant, 4 x no contact possible
Holmsfield Nursery	8	2	6 x no contact possible
Horsemanside Farm	4	0	4 x refusals
Hosanna Lodge	1	0	1 x refusal
James Mead, Waltham Road	2	0	Site inaccessible ³
Longmead, Mill Lane	1	0	Site inaccessible ³
Mamelons Farmyard, Waltham Road	14	1	Owner interviewed and refused access to site
Moss Nursery	5	1	4 x pitches inaccessible ³
Oakwood, Tylers Cross Nursery	1	1	-
Peartree Corner, Tylers Cross Nursery	3	2	1 x pitch did not exist
Plot 1, Silverwood Close	1	0	1 x vacant
Plot 2, Moores Estate	1	0	1 x pitch does not exist
Plot 2, Silverwood Close	1	0	1 x no contact possible
Plot 3 & 4, Silverwood Close	2	0	2 x vacant
Plot 3, Moores Estate	1	0	1 x pitch does not exist

² Prior to being interviewed households are asked to confirm their Travelling Status

³ Sites were generally inaccessible due to locked gates

Plot 3A, Moores Estate	2	1	1 x pitch does not exist
Plot 4, Moores Estate	1	0	Pitch/site doesn't exist
Plot 5, Moores Estate	3	1	No other pitches existed
Plot 5, Silverwood Close	1	1	-
Plot 6, Silverwood Close	1	1	-
Plot 7, Silverwood Close	1	2	-
Plot 8, Silverwood Close	1	0	1 x pitch does not exist
Pond View	1	0	1 x no contact possible
Richards Farm (aka Southall)	3	3	-
Rose Nursery (La Rosa Nursery)	1	0	Site inaccessible ³
Rosewood, Tylers Cross Nursery	3	3	-
Shannons, Tylers Cross Nursery	1	0	1 x no contact possible
Silverwood Yard, Tylers Cross Nursery	1	0	Site inaccessible ³
Small Meadow, Weald Hall Lane	1	1	-
Springfield, Tylers Cross Nursery	2	0	2 x non-Travellers
Springfields, off Church Road	1	0	Site inaccessible ³
Stoneshott View	1	0	1 x no contact possible
The Dales	1	1	-
Tomary	12	1	Owner interviewed and refused access to site
Woodside	1	0	1 x no contact possible
Temporary Sites			
Ashview, Hamlet Hill, Roydon	1	0	1 x no contact possible
Auburnville	1	0	Site inaccessible ³
Devoncot	2	0	Site inaccessible ³
Hallmead Nursery	4	0	Site inaccessible ³
Haslingfield, Meadgate Road	2	0	Site inaccessible ³
Rose Farm	1	1	-
Roydon Lodge Chalet Estate, Roydon	1	0	1 x no contact possible
Sons Nursery	3	0	3 x no contact possible
Tolerated Sites			
None	-	-	-
Unauthorised Sites			
Sunnyside, Nazeing	2	2	-
Green Acres	1	1	-
Neverest, Roydon	1	0	1 x no contact possible
Steers Pigstye	1	0	1 x no contact possible
Valley View	1	0	1 x no contact possible
Travelling Showpeople Yards			
Land at Moreton Sand & Gravel Pit	9	1	8 x no contact possible
TOTAL	151	37	

5. Current and Future Pitch Provision

Applying the New Definition

- ^{5.1} The outcomes from the questions in the household survey on travelling were used to determine the status of each household against the new definition in PPTS. This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the new definition. Only those households that meet the new definition, in that they were able to demonstrate that they travel for work purposes, and stay away from their usual place of residence when doing so – or that they have ceased to travel temporarily due to education, ill health or old age, form the components of need that will form the baseline of need in the GTAA. Households where an interview was not completed who **may** meet the new definition have also been included as a potential additional component of need from ‘unknown’ households.
- ^{5.2} Information that was sought from households where an interview was completed allowed each household to be assessed against the new ‘planning’ definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the travelling status of households living on sites in Epping Forest.

Site Status	Meets New Definition	Does Not Meet New Definition	Unknown
Gypsies and Travellers			
Public Sites	0	3	0
Private Sites	13	15	56
Temporary sites	1	0	14
Unauthorised sites	3	0	3
Sub-Total	17	18	73
Travelling Showpeople			
Private Yards	1	1	8
Sub-Total	1	1	8
TOTAL	18	19	81

- ^{5.3} This shows that for Gypsies and Travellers 17 households meet the new definition and for Travelling Showpeople 1 household meets the new definition of a Traveller. A total of 18 Gypsy and Traveller households and 1 Travelling Showperson household did not meet the new definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill

health or old age. Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – these households did not meet the new definition.

- 5.4 The number of households where an interview was not possible are recorded as unknown. The reasons for this included households that refused to be interviewed, households on sites where the owners refused access, and households that were not present during the fieldwork period – despite up to 3 visits.

Pitch Needs – ‘Travelling’ Gypsies and Travellers

- 5.5 The 17 households who meet the new definition of Travelling were found on 11 private sites, 1 temporary site and 2 unauthorised sites. Analysis of the household interviews indicates that there is a additional need for 3 pitches from unauthorised developments, 1 pitch from a site with temporary planning permission, 3 pitches from concealed families or single adults, 7 pitches from older teenage children in need of a pitch of their own in the next 5 years, and 8 pitches through new household formation using a rate of 1.50% derived from the household demographics.
- 5.6 This gives an overall need for **22 additional pitches** over the 17 year GTAA period to 2033 for Gypsy and Traveller households that meet the new definition.

Gypsies and Travellers - Meeting New Definition	Pitches
Supply of Pitches	
Additional supply from vacant public and private pitches	0
Additional supply from pitches on new sites	0
Pitches vacated by households moving to bricks and mortar	0
Pitches vacated by households moving away from the study area	0
Total Supply	0
Current Need	
Households on unauthorised developments	3
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	3
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	6
Future Need	
5 year need from older teenage children	7
Households on sites with temporary planning permission	1
In-migration	0
New household formation	8
<i>(Base number of households 27 and formation rate 1.50%)</i>	
Total Future Needs	16
Net Pitch Need = (Current and Future Need – Total Supply)	22

2016-21	2021-26	2026-31	2031-33	TOTAL
16	2	3	1	22

Pitch Needs – ‘Unknown’ Gypsies and Travellers

- 5.7 Whilst it was not possible to determine the travelling status of a total of 73 households as they either refused to be interviewed (or the owner of the site refused access), or were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be ethnic Gypsies and Travellers and **may** meet the new definition as defined in PPTS.
- 5.8 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the new definition based on the outcomes of households in that local authority where an interview was completed.
- 5.9 However data that has been collected from over 1,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the new definition – and in some local authorities, particularly London Boroughs, 100% of households do not meet the new definition.
- 5.10 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.
- 5.11 Should further information be made available to the Council that will allow for the new definition to be applied to the ‘unknown’ households, the overall level of need could rise by up to 3 from unauthorised pitches, a further 14 from pitches with temporary planning permission, and a further 21 from new household formation. This uses a base of the 73 households and a net growth rate of 1.50%⁴. Therefore additional need *could* increase by up to a further 38 pitches, plus any concealed adult households or 5 year need arising from older teenagers living in these households (if all 73 ‘unknown’ pitches are deemed to meet the new definition).
- 5.12 However if the national average of 10% is applied to the maximum of 38 additional pitches it is highly likely that actual need from ‘unknown’ households could be as low as 4 additional pitches.

Pitch Needs – ‘Non-Travelling’ Gypsies and Travellers

- 5.13 For *illustrative purposes only* need for 3 additional pitches for Gypsies and Traveller households who do not meet the new definition (which does not now need to be included in the GTAA) is made up of 3 from new household formation using a formation rate of 0.90% that is derived from the household demographics.

⁴ The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

Travelling Showpeople Needs

- 5.14 There were only 2 Travelling Showperson households that were interviewed – 1 meets the new definition and 1 does not. Analysis of the household interviews for these households has identified no current or future accommodation needs.
- 5.15 In addition it was not possible to complete interviews with a further 8 Travelling Showperson households. If the national formation rate of 1.00% is applied to these households there is a need for 1 additional plot over the 17 year GTAA period.

Transit Sites / Temporary Stopping Places

- 5.16 It has been suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case but it will take some time for any changes to pan out. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS 2015 evidence base and there has not been sufficient time yet for this to happen.
- 5.17 It is therefore recommended that the situation relating to levels of unauthorised encampments should be continually monitored whilst any potential changes associated with the new PPTS develop, and in the short-term the Councils should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments. A review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3 year evidence base following the changes to PPTS in August 2015. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.
- 5.18 The term ‘negotiated stopping’ is used to describe agreed short term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the authority and the (temporary) residents regarding expectations on both sides.
- 5.19 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold water supply; portaloos; sewerage disposal point and refuse disposal facilities.

Epping Forest Local Plan 2011-2033

- ^{5.20} The new Epping Forest Local Plan is scheduled to run from 2011 to 2033. Therefore, while this GTAA has a base date of May 2016, this does not cover the period 2011-2016. In the period 2011-2016 a total of 16 additional permanent pitches were completed in Epping Forest and another four are committed to be developed.
- ^{5.21} It is appropriate to add the 16 completed permanent pitches to the identified need for a further 22 pitches and 1 yard for the period 2016-2033 because if the 16 pitches had not have been delivered then the need would have been 16 pitches higher in 2016. Therefore, the total identified need for pitches and yards in Epping Forest over the Local Plan period of 2011-2033 is 38 pitches and 1 yard. Given existing delivery and commitments this leaves a total of 18 pitches and 1 yard to be identified over the remainder of the plan period.

Local Plan Need 2011-2033	Pitches
No of pitches required 2011-2033	38 pitches and 1 yard
Completions	16
Commitments	4
Remaining requirement to be identified	18 pitches and 1 yard