



PARTIAL REVIEW OF REGIONAL  
SPATIAL STRATEGY (RSS) –

Consultation on Interim Draft Policies: Gypsies  
and Travellers  
January – 27 March 2009

(Responses by Organisation)

## North West Regional Assembly

### **PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –** Consultation on Interim Draft Policies: Gypsies and Travellers

A consultation report from

#### **CAG Consultants**

in association with **Concept 4 Creative and Community Consultants**

March 2009

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## 4 NW RPG

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
4 NW RPG	No	-

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
4 NW RPG	No	Will attend meeting on 27 Feb in Chester. "A key objective will be to try and get agreement on pitch numbers (for sub-region & for district) through negotiation and dialogue."

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
4 NW RPG	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
4 NW RPG	

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
4 NW RPG	

## AGMA

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

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AGMA		<p>AGMA Response to the Draft RSS Policies on Accommodation for Gypsies and Travellers and Travelling Showpeople MARCH 2009 1.0 Introduction and Background</p> <p>1.1 The Association of Greater Manchester Authorities (AGMA) welcomes the opportunity to provide a written response to 4NW on the draft pitch provision figures for Gypsies and Travellers and Travelling Showpeople. This response is provided on behalf of, and endorsed by all ten Local Authorities within AGMA, and supports the previous written concerns and verbal responses provided at the two consultation days in February 2009.</p> <p>1.2 AGMA recognised its statutory duties under section 225 of the Housing Act</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>2004 at an early stage, and immediately sought to ensure that all ten Authorities worked together, in accordance with the subsequent published guidance, to provide a high quality, comprehensive, robust and accurate study of the accommodation needs of Gypsies and Travellers and Travelling Showpeople. Following a detailed tender and interview process which focussed particularly on the quality and robustness of the proposed study, ARC4, in partnership with the Northern Network of Travelling People, and the Showmen’s Guild of Great Britain (Lancashire Section) were selected to undertake the assessment. The ARC4 tender was particularly impressive because of:</p> <ul style="list-style-type: none"> <li>• the high number of interviews to be carried out, which would ensure pitch figures could be assessed at District level;</li> <li>• the Partnership with the Northern Network and Showmen’s Guild, which would ensure that a high and accurate response rate would be achieved, with travellers interviewing travellers;</li> <li>• the prolonged interview/consultation process which would ensure that seasonal variations and movement would be encompassed in the study; and</li> <li>• the previous experience and quality of previous work undertaken by these consultants.</li> </ul> <p>1.3 On completion of the fieldwork, detailed discussion took place between the AGMA steering group and the consultants to determine the final methodology for presenting the findings in accordance with CLG guidance, and in particular, whether to focus on the CLG ‘needs’ model or on the CLG ‘geographical preference’ model. The group determined that the ‘preference’ model best met the final intention of the CLG Gypsy and Traveller Accommodation Needs Assessment Guidance (para. 45), an approach which was endorsed when the final report was approved by the AGMA Planning and Housing Commission, albeit with recognised concerns about the ability of individual authorities to deliver the preferences in full. This approach is in accordance with the approach adopted by 4NW under Option 3.</p> <p>1.4 The GM Gypsy and Travellers Accommodation Assessment (GTAA) encompassed 471 interviews, with sampling stratified to include ethnicity, local authority and</p>

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		<p>type/place of residence. Overall this is one of the highest (if not the highest) samples in studies of this nature and makes this one of the most statistically robust GTAA's undertaken to date across the Region and indeed the country.</p> <p>1.5 The remainder of this representation sets out AGMA's comments on the draft RSS policies L6 (Gypsy and Travellers) and L7 (Travelling Showpeople). It is hoped that AGMA's comments are given the appropriate weight when re-drafting the proposed policies in the next stage of the Partial Review.</p> <p>2.0 Gypsy and Travellers (Policy L6)</p> <p>2.1 Overall, AGMA is concerned that given the exhaustive lengths that we have taken to ensure that the GM GTAA provided an honest, robust and comprehensive assessment of needs and preferences in the sub-region that 4NW has used alternative 'evidence' to derive the proposed pitch requirements in Policy L6. AGMA is particularly concerned that 4NW has not set out the detailed methodology of how the proposed Policy figures have been derived.</p> <p>2.2 It would appear that 4NW has simply applied certain assumptions across the whole Region in an attempt to tackle the weaknesses of some of the other sub-regional GTAA's. AGMA accepts, having studied the two brief supplementary technical notes recently provided by 4NW, that there are concerns about the robustness of some of the sub-regional studies. However, AGMA contend that the weaknesses associated with other sub-regional GTAAs are not applicable to the GM GTAA and 4NW should not, therefore, apply blanket assumptions across the whole Region.</p> <p>2.3 AGMA has considered the comments made by 4NW in relation to the lack of clarity on certain issues within the GM GTAA final report. In order to support the robustness of the GM GTAA and to provide the clarity required by 4NW, this response sets out the key aspects that should address 4NW's concerns and highlight why the apparent weaknesses with the other sub-regional studies are not attributable to the GM GTAA. Concealed Households</p> <p>2.4 The supporting text to the proposed policy suggests that the sub-regional GTAAs</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>did not adequately take account of 'hidden' households from overcrowding on existing sites and concealed households on caravan sites and holiday parks.</p> <p>2.5 On this aspect, AGMA contend that the GM GTAA did take full account of both hidden households from overcrowding and concealed households. To support this, 4NW should be aware that the GM GTAA:</p> <ul style="list-style-type: none"> <li>• took full account of concealed households from existing sites and this included concealed households on pitches that were overcrowded;</li> <li>• took full account of concealed households from those groups living in general housing (i.e. 'brick `n` mortar' accommodation) and has factored the demand from these hidden households into the requirements; and</li> <li>• took full account of demand from hidden households on unauthorised encampments.</li> </ul> <p>2.6 It is considered that the proposed policy reference to undercounting in sub-regional GTAAs within 'holiday parks' cannot be directly attributable to the GM GTAA. This is because the GM sub-region does not contain the type of Holiday Parks that 4NW are referring to and, therefore, the need arising from any undercounting of these should not necessarily be applied to the GM sub-regional requirements.</p> <p>2.7 There is an indication from 4NW that an element of the apparent undercounting in the sub-regional GTAAs is because the respondents to the GTAA questionnaires did not provide full details of the number of households on any particular site. However, AGMA considers that the GM GTAA fully engaged with the respective groups in order to get a full picture of their needs. To help achieve this, and to allow respondents to feel at ease, the GM GTAA used the Northern Network of Travellers to actually undertake the survey work. This group is a consulting partnership encompassing recognised Gypsy and Travellers groups (as well as Travelling Showpeople). AGMA considers that the results of the GM GTAA are an accurate reflection of need in the sub-region and take full account of hidden households in the travelling community and does not, therefore, undercount the need within the sub-region (as is being suggested in the proposed policy).</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>2.8 This issue has subsequently been raised by AGMA with the Northern Network of Travellers, who have stated that the issue of undercounting from concealed households is applicable to the other sub-regional GTAA's but does not apply to the GM GTAA (for the reasons outlined above). AGMA contests, therefore, that it is inappropriate to apply certain assumptions to the GM sub-regional study to take account of under reporting elsewhere.</p> <p>2.9 It is also important to note that in addition to undertaking the survey work, representatives from the Northern Network of Travellers were full members of the Steering Group that led that GM GTAA.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
AGMA		<p>"Transit Pitches</p> <p>2.10 The proposed RSS policy splits the draft pitch requirements for each district on a permanent and transit basis. AGMA appreciates that the Partial Review will need to split the pitch requirements on such a basis.</p> <p>2.11 However, AGMA considers that 4NW has misinterpreted the results of the GM GTAA when drafting the proposed pitch requirements in relation to transit pitches. It would appear that 4NW has not taken into account the fact that the GM GTAA findings</p>

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		<p>already took full account of the need to provide transit sites within the sub-region and that these requirements are actually contained within the total pitch requirements. AGMA acknowledges that this may not be immediately evident as the pitch requirements are not actually split between permanent and transit pitches in the GM GTAA report.</p> <p>2.12 AGMA stresses that the split between permanent and transit pitches in the proposed RSS policy should be more reflective of the GM GTAA total requirements and should not be in addition to these. AGMA has reviewed the findings of the GM GTAA and proposes the split outlined in Table 1 as being an appropriate split for the sub-region. This split is based on the findings of the GM GTAA and reflects the general need to provide for such sites in multiples of 10 and the need to ensure a geographical distribution of such sites. Table 1 – GM GTAA Split between Permanent and Transit Sites (New Pitches)</p> <table border="1" data-bbox="741 699 1796 858"> <thead> <tr> <th>District</th> <th>Permanent Pitches</th> <th>Proposed Transit</th> <th>Total GM GTAA Pitches (Perm and Transit)</th> </tr> </thead> <tbody> <tr> <td>Bolton</td> <td>32</td> <td>10</td> <td>42</td> </tr> <tr> <td>Bury</td> <td>35</td> <td>10</td> <td>45</td> </tr> <tr> <td>Manchester</td> <td>56</td> <td>10</td> <td>66</td> </tr> <tr> <td>Oldham</td> <td>16</td> <td>10</td> <td>26</td> </tr> <tr> <td>Rochdale</td> <td>41</td> <td>10</td> <td>51</td> </tr> <tr> <td>Salford</td> <td>29</td> <td>10</td> <td>39</td> </tr> <tr> <td>Stockport</td> <td>25</td> <td>10</td> <td>35</td> </tr> <tr> <td>Tameside</td> <td>7</td> <td>10</td> <td>17</td> </tr> <tr> <td>Trafford</td> <td>12</td> <td>10</td> <td>22</td> </tr> <tr> <td>Wigan</td> <td>29</td> <td>10</td> <td>39</td> </tr> <tr> <td><b>Total</b></td> <td><b>282</b></td> <td><b>100</b></td> <td><b>382</b></td> </tr> </tbody> </table> <p>2.13 4NW will notice that AGMA are generally in agreement with the proposed number of transit sites in Draft Policy L6 and the general methodology used to derive these. The only difference relates to the Manchester figure, which is proposed to be lowered to 10 pitches rather than the proposed 15 in the Draft Policy. However, it should be noted that this broad support for the proposed provision of transit sites is only on the basis that the transit requirements are taken off the sub-regional total as evidenced by the GM GTAA (i.e. as set out in table 1).</p> <p>2.14 AGMA does query whether the methodology used by 4NW takes account of existing transit provision within the GM sub-region. Salford, in particular, already has 15 transit pitches and there is some concern that requiring an additional 10 transit pitches in Salford could deflect the need to provide for more permanent pitches within the City – which may be more necessary to provide. Because of this reason, there would be no objection from AGMA, when 4NW considers this response, if the revised policy did not include any additional transit pitches for Salford. Application of Preferential Approach</p> <p>2.15 AGMA acknowledges and supports the proposed 4NW approach to widen the geographic distribution of pitches to increase provision in areas beyond those where the</p>	District	Permanent Pitches	Proposed Transit	Total GM GTAA Pitches (Perm and Transit)	Bolton	32	10	42	Bury	35	10	45	Manchester	56	10	66	Oldham	16	10	26	Rochdale	41	10	51	Salford	29	10	39	Stockport	25	10	35	Tameside	7	10	17	Trafford	12	10	22	Wigan	29	10	39	<b>Total</b>	<b>282</b>	<b>100</b>	<b>382</b>
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<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>								
		<p>highest level of need is currently evident. There is a current uneven distribution of pitch provision and the Partial Review process provides an opportunity to distribute provision on a more equitable/balanced basis across both the sub-region and the NW Region as a whole.</p> <p>2.16 It is therefore important to note that the findings of the GM GTAA took full account of the need to redistribute pitch provision within the sub-region, rather than simply reflect need where it arose (see para. 6.15 of assessment). It is accepted by AGMA that the steps taken to get from the 'needs' model to the 'preferential' model in the GM GTAA are unclear in the final report but it is important to note that the end results of both methodologies give the same sub-regional total (circa 380 pitches). The 'needs' model figures, which were not included in the final GM GTAA to avoid confusion, have subsequently been forwarded to 4NW to show the stepped approach taken in the GM GTAA. AGMA are willing to provide any further information required to provide clarity on this issue, or indeed any other issue that 4NW may consider appropriate as a result of this representation.</p> <p>2.17 AGMA contests, therefore, that as the GM GTAA study already provides a preference assessment, an approach that is supported by 4NW, that there should be no further need to apply additional pitches on top of these. The CLG guidance: Preparing Regional Spatial Strategy Reviews on Gypsies &amp; Travellers by regional planning bodies, makes it clear in section 4.1, that regional planning boards should give greater weight to cross authority assessments that take factors other than need into account, that is, preference, arguing that such approaches are already taking a strategic view to pitch location.</p> <p>2.18 The figures in Table 1, which reflect the results of the GM GTAA, should therefore provide the main evidence base on which to base the sub-regional pitch requirements in the proposed RSS Policy. 3% Annual Increase</p> <p>2.23 AGMA's concerns about its ability to deliver the pitch requirements is compounded by the fact that the proposed Policy seeks to impose a 3% annual increase on both new and existing provision at 2016. Therefore, not only will districts need to identify sufficient land to meet requirements up to 2016, they will also be expected to identify sufficient land at the outset of their LDFs to cover the period up to 2026. Table 2 sets out what this 3% annual increase could mean for the GM sub-region, based on the results of the GM GTAA. Table 2 – 3% Annual Increase 2016 - 2026</p> <table border="1" data-bbox="741 1404 1798 1431"> <thead> <tr> <th>District</th> <th>Existing Pitches</th> <th>GM GTAA Preferential Figures</th> <th>Total Pitches at</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	District	Existing Pitches	GM GTAA Preferential Figures	Total Pitches at				
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		<p>not realistic to try and forecast need for up to 15 years ahead but to instead base projections on 5-10 years. Accordingly, AGMA considers that the policy wording be revised to reflect this guidance to allow LPA's in their LDF's to phase the pitch requirements over the longer term (e.g. when LDF's are updated). More emphasis on a phased identification of pitch requirements will help local authorities make the initial provision (over 5-10 years), without having to demonstrate how they are going to deliver longer term requirements and the considerable problems associated with this. This would be in line with the 'plan, monitor and manage' approach advocated in PPS3.</p> <p>2.29 At the moment, AGMA is concerned that there is insufficient evidence to support the assumed 3% growth in numbers beyond 2016. AGMA suggests that the Partial Review should just focus on the pitch requirements up to 2016 based around the GM GTAA, whilst acknowledging that there may be some growth beyond this date but that this growth be considered through future reviews of the Regional Strategy and updates of the evidence base. Otherwise, all districts in the Region will have to identify sufficient land and resources in a relatively short timeframe, which will cause considerable issues for LDFs. Sub-Regional Differences</p> <p>2.30 In terms of the regional distribution for Gypsies and Travellers, AGMA broadly supports the 4NW preferred approach under Option 3, which seeks to work with sub-regional partnerships and the Gypsy and Traveller Communities to achieve a more balanced share of needs across districts and sub-regions. Table 3 highlights the current regional distribution as is proposed under Draft Policy L6. The figures in brackets illustrate how the regional distribution would change if the findings of the GM GTAA were built into the Policy.</p> <p>Table 3 - Proposed Sub-regional Distribution for Gypsies &amp; Travellers</p> <table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="2">Sub-Region</th> </tr> <tr> <th>Current Provision</th> <th>% of total</th> <th>Proposed Req*</th> <th>% of total</th> </tr> </thead> <tbody> <tr> <td>2016**</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cheshire</td> <td>278 29%</td> <td>335 22%</td> <td>(25%) 613 25%</td> </tr> <tr> <td></td> <td>390 26%</td> <td>(29%) 729 29%</td> <td>(32%) M'side 30 3%</td> </tr> <tr> <td></td> <td>125 5%</td> <td>(5%) G M'cr 234 25%</td> <td>555 (381) 36%</td> </tr> <tr> <td></td> <td>32%</td> <td>(27%) Total 955</td> <td>100% 1,520 (1,346)</td> </tr> <tr> <td></td> <td></td> <td></td> <td>100% 2,475 (2,301)</td> </tr> </tbody> </table> <p>2.31 The figures in Table 3 illustrate the proposed 4NW figures would give the GM sub-region 32% of the regional provision by 2016. However, if the other sub-regional figures remained as they are proposed and the GM sub-regional figures were amended</p>			Sub-Region		Current Provision	% of total	Proposed Req*	% of total	2016**				Cheshire	278 29%	335 22%	(25%) 613 25%		390 26%	(29%) 729 29%	(32%) M'side 30 3%		125 5%	(5%) G M'cr 234 25%	555 (381) 36%		32%	(27%) Total 955	100% 1,520 (1,346)				100% 2,475 (2,301)
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		<p>to reflect the findings of the GM GTAA, then this share would fall to 27% of the regional total. AGMA consider that the percentage distribution of 27% would be a more equitable distribution for the GM sub-region and would therefore be in line with the approach supported by 4NW under 'Option 3'. AGMA therefore considers that the use of the GM GTAA figures would support the aims of 4NW to achieve a more equitable share of needs.</p> <p>2.32 In support of this, AGMA would point out a comparison with the Merseyside sub-region, which would only have 5% of the total provision by 2016, despite being the north west's second city region. This discrepancy is also repeated in the regional distribution for Travelling showpeople, which is discussed in the next section of this response.</p> <p>2.33 Therefore, AGMA suggests that there may be an opportunity for 4NW to revisit the regional distribution, which may help to overcome some of AGMA's concerns relating to the delivery of the pitch numbers because of capacity and policy constraints (e.g. as highlighted above in Bury, but also applicable to other districts). AGMA reserves the right to comment on any revised pitch requirements for Gypsy and Travellers in the next stage of consultation"</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
AGMA	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

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Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
AGMA	<p>"Delivery of Pitches</p> <p>2.19 AGMA's position is clear that the most reliable and robust evidence for Gypsy and Traveller accommodation in the sub-region is the GM GTAA, and therefore, Policy L6 should be more reflective of this study. However, with the proposed level of need identified in the GM GTAA, AGMA districts have significant concerns about the delivery of these numbers through their LDF's.</p> <p>2.20 One of the key concerns on this issue, relates to the lack of funding available to deliver the required pitches. The HCA has indicated that there will only be £4 million available over the next two years for the provision of Gypsy and Traveller pitches across the whole of the North West. It is AGMA's understanding that this money is intended for new provision and refurbishment of existing sites. At an approximate conservative cost of £60,000 to provide one pitch, the available funds would only provide for around 65 pitches, which equates to only 4% of the total pitches being proposed under Policy L6. There are also ongoing revenue costs associated with this provision as well as refurbishment costs. AGMA districts are concerned, therefore, how they will be able to demonstrate the deliverability of sites through their LDFs.</p> <p>2.21 In addition to this, whilst AGMA accepts that need should not generally be determined by ability to deliver, it is considered that 4NW should take some account of individual local authority's ability to meet any identified proposed pitch requirements. All local authorities will face difficult issues of delivery to a greater or lesser degree, but the problem has been particularly highlighted recently by Bury who are slightly ahead of the other AGMA districts in progressing their LDF and have recent experience of trying to relocate an existing site to a more suitable location. Bury are very strongly of the view that because of policy and capacity constraints it is only able to deliver 30 units up to 2016, rather than the 45 identified in the preference model. To contemplate locations that would undermine other housing objectives and potentially lead to locations being identified at an excessive number of sites in the green belt (which tightly constrains the urban area) would be an unacceptable outcome of the partial review of RSS. These issues and concerns will be shared by other Greater Manchester districts, and reflect AGMA's earlier concern about undertaking a partial review of one or two topics entirely independent of the rest. Whilst therefore all districts can support the GM GTAA work as a piece of technical evidence, practicalities of delivery will require serious consideration in determining policy responses at the regional level.</p> <p>2.22 Lastly, AGMA raises the issue of existing provision and how new provision is to be delivered. As things stand at present there are authorities in the North West at present who have no provision for Gypsies and Travellers. It is suggested that new provision should be made sequentially so that the delivery of new sites is made first of all in those local authority areas where no provision currently exists."</p>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
AGMA	<p>"4.0 Summary</p> <p>4.1 AGMA contends that the most reliable and robust source of evidence available to all parties in the Partial Review of RSS is the GM GTAA. The weaknesses associated with other sub-regional GTAA's in terms of undercounting and not applying a preferential approach are not applicable to the GM GTAA. This has been confirmed by the Northern Network of Travellers.</p> <p>4.2 Accordingly, Policy L6 (Gypsies and Travellers) should give significant weight to the findings of the GM GTAA as it progresses through the next stages of the Partial Review process. Because of the robustness of the GM GTAA, AGMA strongly objects to the policy as it currently stands. There is no apparent justification for a 46% increase in pitch requirements from the GM GTAA within the Policy. AGMA hopes that the information provided in this representation gives 4NW the information it requires to support the findings of the GM GTAA but if further information or clarity is required then AGMA is willing to provide this.</p> <p>4.3 AGMA also has significant concerns about the delivery of the proposed policy requirements and the implications that this may have for the progress of LDFs. In particular, there are capacity and policy constraints, and issues of sequence of delivery, that will need to be considered by LPA's as they take their LDF's forward and these concerns need to be considered by 4NW when the proposed policy is revised to reflect concerns raised by those making representations.</p> <p>4.4"</p>

## Allerdale Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Allerdale Borough Council	No	<p>We have similar concerns to Cumbria County Council. We are concerned about the discrepancy between the figures in the Cumbria GTAA and those in Draft Policy L6. The differences in figures for existing provision need to be investigated. We are also concerned that the increased figure for need in Allerdale is not firmly founded on robust evidence. In addition, the reasoning behind the proposal to factor in an annual growth figure for future provision of pitches is not clear and needs to be clarified. Finally, the proposal to increase figures for the future requirement for pitches, merely to widen the choice for G &amp; Ts, needs to be more robustly argued. Is it in line with national policy? The proposal could cause difficulties for authorities, eg Copeland, where this proposal would make the difference between not needing a site and needing one.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
4 NW RPG	No	Will attend meeting on 27 Feb in Chester. "A key objective will be to try and get agreement on pitch numbers (for sub-region & for district) through negotiation and dialogue."

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Allerdale Borough Council	Elements of the proposals need to be more robustly argued with clear reference to evidence.

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Allerdale Borough Council	No

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Allerdale Borough Council	No

## Barrow Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Barrow BC	-	-

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Barrow BC	-	-

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Barrow BC	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Barrow BC	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Barrow BC	<p>"The 2008 Cumbria Gypsy and Traveller Accommodation Needs Assessment identified a lesser number of permanent and transit pitches that is currently proposed by 4NW, but it is unclear from the Cumbria Assessment whether the occupants of the Old Candleworks Site at Schneider Road in Barrow have been fully considered. The Cumbria Assessment did include the results of the Caravan Count (which included this site), but it is not clear from the text of the Assessment, how and if this site and its occupants were assessed.</p> <p>The Old Candleworks Site has been a residential caravan site since the 1990s, having been granted planning</p>

Organisation:	7. Any other comments?
	<p>permission for 12 pitches on appeal in 1993, with a further permission taking the total to 17 pitches in 1995. The occupation of the site is not restricted via the relevant planning permissions to Gypsies or Travellers, but some of the pitches have been and are understood to be occupied by Gypsies and Travellers. A number of the pitches are vacant and have been throughout the site's recent history.</p> <p>There is a condition on the most recent Site Licence dating from October 1998 that restricts occupancy of the 17 pitches to Gypsies as defined by Section 16 of the Caravan Sites Act 1968. One of the current occupiers of the site advises that there are currently 10 pitches occupied on the site, all by Gypsies. As there are no occupancy restrictions through the planning permission, the Local Planning Authority has never had cause to question whether or not the occupants comply with the definition under the 1968 Act, or the more recent definition under Circular 01/2006 which is recommended by the Planning Inspectorate.</p> <p>Whilst the Council supports the need to reassess the accommodation needs for Gypsies and Travellers in Barrow, it would be concerned that any unjustified over-provision of pitches could make private sites unviable and may also result in the Council having to enforce against non-eligible occupants who would happily occupy an otherwise vacant residential caravan pitch."</p> <p><i>Could you please note that the views expressed represent officers views only</i></p>

## Blackpool Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Blackpool Council	Yes	<p>Blackpool Council is supportive of the draft Policy L6 wording – subject to two suggested brief amendments fully consistent with the intent of the Policy. In line with the preferred option of the majority of respondents at the earlier consultation stage, Blackpool Council strongly supports the view that future provision should be required to be met on the basis of a wider sub-regional approach for a more balanced share of meeting need across districts, as now reflected in the draft proposed NWRSS Partial Review Policy L6.</p> <p>Meeting the identified need on a “needs arise” basis, with existing provision already overwhelmingly concentrated in a number of local authority areas, including Blackpool, is not supported. This is not just because it is inequitable – with the need for a fairer distribution - but also in Blackpool’s terms because it is not realistically possible, with major constraints and demands on the limited remaining lands, and an overwhelming concentration of existing gypsy site provision in Blackpool already in one specific location. While Blackpool Council therefore fully supports draft Policy L6 this is subject to two specific needs for clarification:</p> <p>Firstly, whilst the policy sets out that there is a need for a more equitable distribution across a range of sites in line with the spatial principles of the range of NWRSS policies referred to in the policy – the policy wording still fails to provide a clear basis for the implementation and delivery of such a fairer and wide distribution of sites. The potential, in accord with the policy is that LPAs could still come forward with proposals that concentrate development in existing narrow locations, even if providing “a range of sites” It is therefore considered the words in Policy L6 paragraph 4 should be amended with a simple addition to state: “as soon as possible across a range of sites, locations and tenures dispersed across each area through .... etc</p> <p>Secondly, the policy requirements in paragraph 4 for future provision do not just relate to the period to 2016, but to the whole plan period. Reference to the provision being required “by 2016” therefore should be deleted, or, alternatively, amended to state “to 2016 and beyond”</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Blackpool Council	No	<p>In line with Blackpool Council's comments at Q4 above, the equal split of provision of planned future provision of 30 new pitches between the 3 authorities across the Fylde Sub-Region is a fairer and wider split of future growth. However, in the context of the overall concentration of existing provision in one narrow area and the extreme limitations and demands on available land, a more equitable split would be for no further provision in Blackpool.</p> <p>There are major constraints on available land in Blackpool, which is the most densely populated and built up district in the North West Region covering only 35 sq kilometres. Both Gypsy and Traveller and Travelling Showpeople sites, typically require urban fringe locations and Blackpool has only very limited remaining such lands which also must meet a wide range of housing and other development needs. The requirements for rapid housing growth coming from the RSS and the Central Lancashire/ Blackpool Growth Point bid, and the aspirational aims for a new edge of Blackpool housing offer further reduce the scope and opportunities for provision against the extreme limitations on land supply to meet all Blackpool's needs.</p> <p>It is well understood that in the context of the limited overall size of site requirements for gypsies and travellers the "we have insufficient land" response is not one which is persuasive or would normally expect to win support. However, there are just 207 hectares of remaining countryside in south east Blackpool, and the point is this is where Blackpool's 5 existing gypsy sites are already located. In the context of a policy that is expressly seeking to provide for a more equitable distribution of sites so that gypsies and travellers enjoy the same opportunities of access to services and facilities on a more balanced basis across LPAs, then it would be totally contrary to these aims for further increases in provision to be located in Blackpool which has just 1% of Lancashire's land area, and far less than 0.1% of remaining undeveloped land.</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>There has been no new edge of Blackpool allocations of any lands at all for either housing, employment, or any other use in its current adopted Local Plan. Blackpool is also unable to meet its need for future employment land or housing land within its own local authority area.</p> <p>The target for gypsy site provision in Blackpool thus realistically needs to be minimised. Blackpool remains committed to meeting its requirements to provide sites - a commitment that is reinforced in the current comprehensive refurbishment programme on the Local Authority- managed site. Furthermore, our expertise at design, delivery and management of Gypsy &amp; Traveller sites could be used by the neighbouring authorities to bring schemes forward.</p> <p>Blackpool Council therefore seeks an approach which fully reflects the need for a more even split of future provision across the wider Fylde Sub-Region, with no further provision required in Blackpool itself to 2016.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Blackpool Council	For clarity, and in line with Blackpool Council's comments at Q4, paragraph 8 should be amended to state: "Subject to the need for a range of sites and locations dispersed across each sub-region, the more specific location and design of pitches is a matter for LPAs etc .....

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Blackpool Council	No.

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Blackpool Council	It needs to be made clear in the Policy or in the supporting text (in line with \$NW comments at the Workshops) that the identification of sites for G &T is seen as a "strategic" need which can be met in the Core Strategy rather than site Allocation or other DPDs. Early delivery and implementation of Policy L6 will be supported by such clarification.

## Blackpool Equalities Forum

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Blackpool Equalities Forum	Yes	The forum is pleased that points raised in its initial response have been considered and incorporated into the draft policy. This is the first time that the Equalities Forum (a Community Forum made up of Blackpool residents) has taken part in a regional consultation, so it means a lot when our responses are listened to.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Blackpool Equalities Forum	Yes	<p>The figures show that steps are being taken to provide a more even distribution of pitches on the Fylde Coast, rather than all of the pitches being in Blackpool.</p> <p>Every sub-region has a responsibility to provide suitable accommodation for its residents. Spreading pitches out also means that it is less likely for existing provision (public and private) to become overcrowded and existing services to become oversubscribed (e.g. home schooling support services provided by the local authority). Also, the provision of designated temporary accommodation in the Fylde coast area will probably ease some of the "Not In My Back Yard" attitude of some residents at times of the year when Gypsies and Travellers visit the area.</p>

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Blackpool Equalities Forum	<p>It is good to see that the supporting text looks at the wider equality issues that are linked to accommodation. Also, it could be useful to add at point 9 to mention Cohesion Impact Assessments, and how they could be used when deciding on situating new pitches to ensure that there are no adverse impacts in the locality.</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Blackpool Equalities Forum	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Blackpool Equalities Forum	Hopefully, the increased provision of good quality accommodation (especially operated by Registered Social Landlords and Local Authorities) will allow people from the Gypsy and Traveller communities to access more services like healthcare and community learning facilities; and to engage more with public forums like our own, and therefore be represented at a strategic level in the region.

## Burnley Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Burnley Borough Council	No	<ul style="list-style-type: none"> <li>o The latest figures take into account information from 4NW's recent consultation with the Gypsy &amp; Traveller community, which suggested that the GTAAs were an underestimate of the overall Regional need for additional pitches. As a consequence in the latest iteration of the policy several Local Authorities have had their allocations increased.</li> <li>o It is unclear how the latest figures have been arrived at- planners at 4NW have made a 'creative leap' to estimate an additional level of regional need which is not based on evidence in the GTAAs.</li> <li>o Furthermore, the additional need is not spread evenly through Lancashire's local authority areas. Burnley's allocation is increased, but Ribble Valley's isn't, in spite of similar estimates of need in the GTAA.</li> <li>o Our policy position is that a requirement of 10 pitches would be reasonable given the GTAA requirement of 6-7 plus a few more pitches to make any site viable. The increased figures in the latest iterations of RSS policy are based on unclear methodology</li> <li>o There is little evidence of demand for additional pitches within the Borough, with no planning applications or pre- app discussions relating to Gypsy &amp; Traveller provision over the past 10 years.</li> </ul>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
Burnley Borough Council	No	<p>"o The latest figures take into account information from 4NW's recent consultation with the Gypsy &amp; Traveller community, which suggested that the GTAAs were an underestimate of the overall Regional need for additional pitches. As a consequence in the latest iteration of the policy several Local Authorities have had their allocations increased.</p> <p>o It is unclear how the latest figures have been arrived at- planners at 4NW have made a 'creative leap' to estimate an additional level of regional need which is not based on evidence in the GTAAs.</p> <p>o Furthermore, the additional need is not spread evenly through Lancashire's local authority areas. Burnley's allocation is increased, but Ribble Valley's isn't, in spite of similar estimates of need in the GTAA.</p> <p>o Our policy position is that a requirement of 10 pitches would be reasonable given the GTAA requirement of 6-7 plus a few more pitches to make any site viable. The increased figures in the latest iterations of RSS policy are based on unclear methodology</p> <p>o There is little evidence of demand for additional pitches within the Borough, with no planning applications or pre- app discussions relating to Gypsy &amp; Traveller provision over the past 10 years."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Burnley Borough Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Burnley Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Burnley Borough Council	-

## Carlisle City Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Carlisle City Council	No	Comments relate to pitch distribution figures

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Carlisle City Council	No	It would appear that the justification for the increase in pitch provision for the districts has been based on the feedback from discussions with the Gypsy and Traveller

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		Community to address the issue of 'hidden overcrowding' on existing sites and 'concealed households'. We are aware that there was no representation from the Gypsy and Traveller community in Cumbria, therefore we do not feel there is sufficient robust evidence to support the increase in pitch figures.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Carlisle City Council	Generally agree with the wording of the supporting text.

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Carlisle City Council	-

### 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Carlisle City Council	-

## ChALC

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
ChALC		-

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
ChALC		

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
ChALC	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
ChALC	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
ChALC	-

## Cheshire CC

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Cheshire CC	No	-

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Cheshire CC	No	

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Cheshire CC	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Cheshire CC	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Cheshire CC	-

## Cheshire East Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Cheshire East Council	No	-

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Cheshire East Council	No	"The Council cannot support such a significant increase in the requirement figures from those contained in the Cheshire GTAA. Despite the publication of additional material it is still not clear how such an increase was decided upon. Whilst it is accepted that the GTAA can be a starting point for provision there should be robust evidence to justify departing from these figures. Specific points of concern include:

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<ul style="list-style-type: none"> <li>• Minutes of a meeting in December 2008 reported that the revised requirement figures were based on a 70% increase from those originally consulted upon – how was this decided upon?</li> <li>• It is considered that the GTAA for Cheshire already took account of ‘concealed households’;</li> <li>• How representative were the consultations with the G&amp;T community that informed the change from the figure of 54 to 80?</li> <li>• Was any account taken of cross-border links and provision within areas immediately adjoining the North West Region?"</li> </ul>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Cheshire East Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Cheshire East Council	<p>"The G&amp;T Co-ordinator for the Cheshire sub-regional partnership has provided additional evidence to be considered. This demonstrates there has been a significant decrease in the encampment figures for Cheshire East. The reasons for this decrease are: -</p> <ol style="list-style-type: none"> <li>1. The impact of the ‘accepted’/tolerated encampments in Halton (17 pitches) and Ellesmere Port (9 pitches).</li> <li>2. The opening of a transit site (10 pitches) in Halton.</li> <li>3. The current economic climate &amp; lack of work for the G&amp;T community in the area. YEAR (Jan – Dec)</li> </ol>

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
	NUMBER 2008 30 2007 58 2006 51"

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Cheshire East Council	In line with guidance on implementation in PPS11 it should be demonstrated how RSS will be implemented with respect to provision of sites. Provision of sites can have major resource implications and will future regional funding reflect this? Further guidance should be given on land take requirement i.e. how many pitches per hectare. Text should be clarified so it is clear that permissions granted after 2007 will count towards the requirement (as explained at the Cheshire G & T consultation workshop).

## Cheshire West and Chester Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Cheshire West and Chester Council	No	-

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Cheshire West and Chester Council	No	<p>"The Council cannot support such a significant increase in the requirement figures from those contained in the Cheshire GTAA. Despite the publication of additional material it is still not clear how such an increase was decided upon. Specific points of concern include:</p> <ul style="list-style-type: none"> <li>• Minutes of a meeting in December 2008 reported that the revised requirement figures were based on a 70% increase from those originally consulted upon – how was this decided upon?</li> <li>• It is considered that the GTAA for Cheshire already took account of ‘concealed households’;</li> <li>• How representative were the consultations with the G&amp;T community that informed the change from the figure of 45 to 80?</li> <li>• Was any account taken of the situation in North Wales? In other areas RSS acknowledges the close cross-border links between West Cheshire and NE Wales. It is</li> </ul>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		considered important that there should be robust evidence to justify departing from the requirement figures. Therefore, until such evidence is provided the Council will only support the inclusion of the figures for Cheshire West and Chester shown in the Cheshire GTAA."

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Cheshire West and Chester Council	-

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Cheshire West and Chester Council	<p>"The G&amp;T Co-ordinator for the Cheshire sub-regional partnership has provided additional evidence to be considered. This demonstrates there has been a significant decrease in the encampment figures for the Cheshire West and Chester. The reasons for this decrease are: -</p> <ol style="list-style-type: none"> <li>1. The impact of the 'accepted'/tolerated encampments in Halton (17 pitches) and Ellesmere Port (9 pitches).</li> <li>2. The opening of a transit site (10 pitches) in Halton.</li> <li>3. The Current economic climate &amp; lack of work for the G&amp;T community in the area. YEAR (Jan – Dec) NUMBER 2008 23 2007 115 2006 112"</li> </ol>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Cheshire West and Chester Council	In line with guidance on implementation in PPS11 it should be demonstrated how RSS will be implemented with respect to provision of sites. Provision of sites can have major resource implications and will future regional funding reflect this? Further guidance should be given on land take requirement i.e. how many pitches per hectare. Text should be clarified so it is clear that permissions granted after 2007 will count towards the requirement (as explained at consultation workshop).

## Chorley Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Chorley Borough Council		CHORLEY COUNCIL RESPONSE TO 4NW: NORTH WEST PLAN PARTIAL REVIEW ACCOMMODATION FOR GYPSIES AND TRAVELLERS: INTERIM DRAFT POLICY L6 - SCALE AND DISTRIBUTION OF GYPSY AND TRAVELLERS PITCH PROVISION. 1.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>Chorley Council supports the principle of Interim Draft Policy L6. However, we object to the Gypsy and Travellers proposed pitch distribution and numbers identified for the Borough in 4NW consultation Report.</p>
<p>Corporate Director (Business) Chorley Borough Council</p>	<p>No</p>	<p>Central Lancashire Authorities Response to 4NW Accommodation for Gypsies and Travellers: Interim Draft Policy L6- Scale and Distribution Accommodation of Gypsy and Travellers Pitch Provision Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L6; and accept the need to provide a certain level of additional pitches for gypsies and travellers. However the Central Lancashire authorities do object to the Gypsy and Travellers proposed pitch distribution and numbers identified for each authority. Lancashire Sub Regional Gypsy and Traveller Accommodation and related Services Assessment 2007</p> <p>2 A GTAA identifies future needs, the Regional Spatial Strategy translates this into figures per local planning authority and local authorities identify sites to meet this need in development plan documents prepared through the local development framework.</p> <p>3 A series of GTAAs, including one for Lancashire were commissioned in 2007 by the North West Regional Assembly. These were carried out by Salford Housing and Urban Studies Unit, part of Salford University.</p> <p>4 The findings of the GTAA were reported to the Lancashire Leaders and Chief Executive's meeting in April 2007 prior to the final report being produced in May 2007.</p> <p>5 Existing Pitch Provision- Preston has an official Gypsy and Traveller site at Leighton Street. This is owned by Lancashire County Council but managed on their behalf by PCC Estates. The site has 12 pitches and could possibly be extended to accommodate a further 5 pitches.</p> <p>6 The Leighton Street site is occupied entirely by one ethnic group – Irish Travellers. This is a fairly settled group and proposals in the GTAA recognised that the primary need was to meet the future accommodation requirements of this group.</p> <p>7 Survey work carried out for the GTAA indicated that there were 3 pitches in</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>unauthorised developments across Preston. The occupants of these require authorised residential development.</p> <p>8 Neither South Ribble Council nor Chorley Council has an existing official Gypsy and Travellers site within their local authority boundary</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Chorley Borough Council		<p>2. Salford Housing and Urban Studies Unit produced a Sub Regional Gypsy and Traveller Accommodation and related Services Assessment for Lancashire in 2007 (GTAA). This indicated that no pitches were needed in Chorley. The basis of the nil requirement was that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. Therefore, this study found no evidence that pitches were needed. The proposed pitch distribution in the 4NW consultation report ignores these findings. Since 2007 records show that there have been 1- 2 brief visits by travellers to the Borough, who were in transit to another destination but this does not justify the provision proposed in the 4NW consultation report.</p> <p>3. There appears to be very little evidence to justify the provision proposed in the 4NW consultation report. 10 permanent pitches are proposed in the Borough for the period up until 2016 and 5 transit pitches. In addition, beyond 2016 to 2021, the report states that provision should be made across the region for an annual 3% compound increase in the level of pitch provision, so further pitches will be required in the Borough. It is suggested that undercounting and overcrowding /doubling up on existing sites in Lancashire accounts for the proposed Lancashire wide increase in pitches. However, it is unclear why this was not taken account of in the GTAA and there does not seem to be an hard evidence to support the increases, or to justify an annual 3% compound increase in the level of pitch provision beyond 2016. It is difficult to understand the methodology or on what basis this has resulted in the overall increase.</p>
Corporate Director (Business) Chorley Borough Council		<p>"GTAA Recommendations (May 2007)</p> <p>9 The GTAA recommended for Preston that, in addition to the 12 pitches on site at Leighton Street there should be a further 18 – 21 pitches provided by 2016. The rationale behind this was: Pitches</p> <p>Unauthorised Development:</p> <p>3 Concealed Households:</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>4 New household formation*: 10.1 – 10.5 Households currently in bricks and mortar**: 0.95 – 3.15 Total 18.05 – 20.65 *This is identified as 6 up to 2011 and then a multiplier is applied for the period 2011 -2016 giving a range of 4.1 – 4.5. **This is based on a percentage estimate based on findings that between 19% and 63% of the G &amp; T population currently in bricks and mortar accommodation (mainly Ribbleton) are likely to move back into caravan accommodation.</p> <p>10 The GTTA indicated that no pitches were needed in South Ribble or Chorley for Gypsies and Travellers.</p> <p>11 The basis of the nil requirement for Chorley and South Ribble in the Lancashire Gypsy and Traveller Accommodation Assessment is that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. In other words there was no evidence that pitches were needed.</p> <p>12 South Ribble’s records show they had one brief visit by travellers in early 2007 who were in transit to another destination.</p> <p>13 Chorley Council’s records show that since 2007 there have only been 1 or 2 brief visits by travellers who were in transit to another destination.</p> <p>14 Overcrowding- It is also noted in May 2007 that CLG published “Local authorities and Gypsies and Travellers: a guide to responsibilities and powers”. At paragraph 20 it identifies in February 2005 that CLG issued interim guidance on how to conduct accommodation needs assessments, which set out some key principles to be followed. In paragraph 22 it outlines the key principles needed to underpin any good quality accommodation assessment. These include that accommodation assessments need to look at both the current shortfall in accommodation as well as projections of future growth. The guide states, “there are real issues about overcrowding and suppressed household formation in the Gypsy and Traveller communities, just as with the settled community. The assessment should capture this”.</p> <p>15 It is obvious overcrowding has been an issue for some time and that this information could have been gathered when the accommodation needs assessment was being undertaken or prior to the further consultation that took place in June 2008 and/or prior to the additional consultation with Gypsies and Travellers in November 2008. 4NW Consultation Allocation (January 2009)</p>

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		<p>16 The table below gives a comparison of the GTAA and 4NW pitch provisions allocations in Lancashire. Local Authority Current authorised provision Additional GTAA proposed to 2016 Additional 4NW permanent proposed to 2016 Additional 4NW transit proposed to 2016 Total 4NW additional proposed</p> <table border="1"> <thead> <tr> <th></th> <th>Pitches</th> </tr> </thead> <tbody> <tr> <td>Darwen</td> <td>48</td> <td>69-83</td> <td>60</td> <td>5</td> <td>65</td> <td>Blackpool</td> <td>51</td> <td>24</td> <td>10</td> <td>5</td> <td>15</td> <td></td> <td></td> </tr> <tr> <td>Burnley</td> <td>0</td> <td>6-7</td> <td>20</td> <td>5</td> <td>25</td> <td>Chorley</td> <td>0</td> <td>0</td> <td>10</td> <td>5</td> <td>15</td> <td>Fylde</td> <td></td> </tr> <tr> <td></td> <td>0</td> <td>1.0</td> <td>10</td> <td>5</td> <td>15</td> <td>Hyndburn</td> <td>86</td> <td>30-33</td> <td>45</td> <td>5</td> <td>50</td> <td></td> <td></td> </tr> <tr> <td>Lancaster</td> <td>142</td> <td>29-30</td> <td>45</td> <td>5</td> <td>50</td> <td>Pendle</td> <td>0</td> <td>2</td> <td>15</td> <td>5</td> <td>20</td> <td></td> <td></td> </tr> <tr> <td>Preston</td> <td>12</td> <td>18-21</td> <td>45</td> <td>5</td> <td>50</td> <td>Ribble Valley</td> <td>0</td> <td>6</td> <td>10</td> <td>5</td> <td>15</td> <td></td> <td></td> </tr> <tr> <td>Rossendale</td> <td>0</td> <td>0</td> <td>10</td> <td>5</td> <td>15</td> <td>South Ribble</td> <td>0</td> <td>0</td> <td>10</td> <td>5</td> <td>15</td> <td></td> <td></td> </tr> <tr> <td>West Lancs.</td> <td>0</td> <td>17</td> <td>20</td> <td>5</td> <td>25</td> <td>Wyre</td> <td>0</td> <td>0</td> <td>10</td> <td>5</td> <td>15</td> <td>Total</td> <td></td> </tr> <tr> <td></td> <td>339</td> <td>202 - 224</td> <td>320</td> <td>70</td> <td>390</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>17 The 4NW consultation report proposes an additional 45 permanent residential pitches in Preston by 2016 giving, with the existing provision at Leighton Street, a permanent provision of 57 pitches. In addition to that 4NW propose an additional 5 transit pitches.</p> <p>18 The 4NW consultation report proposes a new provision of 10 permanent residential pitches and 5 transit residential pitches for both South Ribble and Chorley Councils to 2016.</p> <p>19 In addition beyond 2016 to 2021 provision should be made across the region for an annual 3% compound increase in the level of overall residential pitch provision. This would mean that Preston would need to provide an additional 54 permanent residential pitches and 6 transit residential pitches up to the period 2021, South Ribble and Chorley Councils will need to identify 12 permanent residential pitches and 6 transit residential pitches to the period 2021. These pitch provision figures are not a maximum provision as best practice suggests that the pitch provision figure should be rounded up in 5's. This also allows for fool proofing for the future.</p> <p>20 The Central Lancashire authorities consider information on the collection of the evidence base is not up to date as the GTTA is only robust enough to go to 2016. What evidence is there that the annual 3% compound increase beyond 2016 is the annual growth rate that should be applied?</p> <p>21 It is considered there are a disproportionate number of pitches proposed in Lancashire compared to Merseyside and Greater Manchester, where it is understood the</p>		Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Darwen	48	69-83	60	5	65	Blackpool	51	24	10	5	15			Burnley	0	6-7	20	5	25	Chorley	0	0	10	5	15	Fylde			0	1.0	10	5	15	Hyndburn	86	30-33	45	5	50			Lancaster	142	29-30	45	5	50	Pendle	0	2	15	5	20			Preston	12	18-21	45	5	50	Ribble Valley	0	6	10	5	15			Rossendale	0	0	10	5	15	South Ribble	0	0	10	5	15			West Lancs.	0	17	20	5	25	Wyre	0	0	10	5	15	Total			339	202 - 224	320	70	390								
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<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>greatest need/demand lies.</p> <p>22 The only authorities to benefit from the 4NW proposal compared with the GTAA figures are Blackburn with Darwen and Blackpool. It is unclear why this is the case?</p> <p>23 The overall additional provision proposed by 4NW, including transit pitches, represents an increase above the range proposed in the GTAA of between 74% and 93% depending on whether the higher or lower range figures from the GTAA are used. It is difficult to understand the methodology or on what basis this has resulted in this overall increase. Where is the justification for an increase of this magnitude? The Central Lancashire authorities do not accept that an increase from 200 pitches (GTAA figure to 2016) in Lancashire to nearly 400 pitches (4NW figure to 2016) has resulted because of undercounting and overcrowding/doubling up on existing sites. There does not seem to be any hard evidence on these issues.</p> <p>24 The permanent residential requirements of 12 pitches (compound by 3%) for South Ribble and Chorley Councils are the lowest pitch requirements (6 authorities have this requirement) within Lancashire but there is no comparison to the nil local requirements established in the GTAA. The transit pitch requirement is the same as the rest of Lancashire – 5 pitches for every local authority, and within the Lancashire - wide requirement established by the GTAA."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Chorley Borough Council	<p>4. The Technical Note on how the Interim Draft Policy figures were derived (February 2009) is supposed to explain how the figures were derived. It is clear that an effort has been made to make a more equitable distribution of gypsy and traveller sites throughout Lancashire, but it is not clear how this reflects where gypsies and travellers want to live. The Technical Note states that the Interim Draft figures are not based on a precise mathematical formula, but instead are based on 'professional judgement'. We would question this professional judgement, as there is no clear audit trail showing where the figures have come from and very little evidence is presented. There needs to be greater transparency in how the figures have been reached .</p>

Organisation:	5. Do you have any comments to make about the supporting text?
<p>Corporate Director (Business) Chorley Borough Council</p>	<p>"Technical Note on how the Interim Draft Policy Figures were derived (February 2009)</p> <p>25 The 4NW technical note confirms the GTAA study recommended that the identified needs did not necessarily mean they should be met in specific localities and that decisions about where need should be met should be taken on a strategic basis through partnership working between regional and sub regional/local organisations. This included the consultation stages on the 3 options undertaken in June 2008 and clear support for option 3 working with sub-regional partnerships and the Gypsy and Traveller Community to agree a more balanced share of meeting need across districts, reflecting a wider range of factors other than solely the "need where it arises" basis.</p> <p>26 This work with sub regional partnerships and the Gypsy and Traveller Community has seen pitch provision distributed to meet the requirements for Gypsies and Travellers so that they have the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community and thus contribute towards community cohesion and sustainable communities.</p> <p>27 The Technical Note indicates that using the evidence base and feedback from the consultations 4NW officers then made a professional policy judgement to come up with an initial set of pitch provision. The technical note states "this is not based on a precise mathematical formula". The Central Lancashire authorities question this "professional judgement".</p> <p>28 Following online consultation on a set of pitch provision (Nov/Dec 2008), 4NW issued a further revised provision as set out in Policy L6, Table 7.2. The level of provision now reflects the needs of those currently resident in the North West on pitches/sites without planning permission, anticipated natural growth and net movements between pitches and other forms of accommodation. This also addresses "hidden " overcrowding on existing sites and concealed Gypsy and Traveller households who currently reside on other caravan sites and holiday parks who remain undetected in GATT's. The Technical Note indicates "Once again, it should be noted that the Interim Draft figures are not based on a precise mathematics formula".</p> <p>29 The Central Lancashire authorities again question this "professional judgement" as there is no audit trail where these figures have come from. How does the more equitable distribution of pitches reflect where Gypsies and Travellers want to live? As there is not enough evidence and concise information, 4NW surely cannot make a sound judgement.</p> <p>30 Why is it that the comprehensive GTAA missed the overcrowding issues on existing sites? Why was overcrowding and hidden issues not considered earlier and examined before the main consultation stages arose?</p> <p>31 It is still considered the Technical Note does not present enough detail/evidence as to why 4NW's extended the figures from those in the GTAA to the ones in the current RSS partial review consultation. It is questionable whether "professional judgement" is enough. The increase is apparently as a result of the closed consultation exercise that was held in November 2008. The results of that consultation presented on 4NW website show in fact that most of the comments posted either reject the figures being put forward by 4NW, or if they do accept them do so on the basis that they reflect the GTAA figures. There needs to be transparency in how the 4NW figures have been reached. There needs to be clarity on what is the actual level of existing provision and why there is such a discrepancy between the papers issued in August 08 and January 09?"</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Chorley Borough Council	
Corporate Director (Business) Chorley Borough Council	<p>"Other Issues</p> <p>32 How do we know the extent of Gypsy and Traveller households living on other kinds of sites?</p> <p>33 Why is it necessary to seek to house all Gypsy and Traveller households on dedicated sites rather than allowing continued use of other sites (subject to the general restrictions on the use of holiday homes)?</p> <p>34 Why is it imperative that we meet all possible housing requirements when for the settled community there is a large gap between housing needs and what can be delivered?"</p>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Chorley Borough Council	<p>5. To conclude, Chorley Council objects the proposed pitch requirements for the Borough in the consultation report. The evidence base for these requirements does not appear robust. There is an absence of hard evidence, consistency and clarity. Therefore, Chorley Council continues to support the recommendations in the GTAA.</p>
Corporate Director (Business) Chorley Borough Council	<p>"Ethnic Groupings</p> <p>35 The Gypsy &amp; Traveller population in Preston is made up of Irish Travellers and the GTAA in making its recommendations focused on the future accommodation needs of this ethnic group. There is no indication that those needs have more than doubled since the GTAA was produced. Turnover</p> <p>36 Neither the GTAA, nor the 4NW figures appear to take into account turnover of existing pitches. While these may be relatively settled populations with little movement the issue of turnover should be addressed to ensure that the proposed pitch allocations are not in fact an over-provision. Definition of a transit pitch</p> <p>37 More detail is required on what would be classed as meeting the requirements for transit pitch provision? The draft Partial Review RSS policy proposes that in addition to permanent pitch provision, each of the Lancashire authorities provides 5 transit pitches. These are described as potentially including:</p> <p>38 Larger pitches on residential sites provide the potential to meet the needs of short term visitors. Formal transit sites Less-equipped 'tolerated' stopping places used on a regular basis Temporary sites with</p>

<b>Organisation:</b>	<b>7. Any other comments?</b>
	<p>temporary facilities available during an event, family gathering or for part of the year. Central Lancashire Authorities Requirements</p> <p>39 The Central Lancashire Authorities of Preston City, South Ribble and Chorley Councils do not accept the interim draft pitch provision figures and consider interim Draft Policy L6 and Table 7.2 should be simplified to identify exactly what pitch provision figures 4NW require to the period 2021.</p> <p>40 In the absence of any other evidence, consistency and clarity the Central Lancashire authorities continue to support the GTAA recommendations."</p>

## CPRE North West

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
CPRE North West	No	<p>Overall we support the policy, but subject to the following amendments:-</p> <ol style="list-style-type: none"> <li>1. The policy should also refer to policy DP9. Mitigation of &amp; adaptation to climate change applies to all policy areas, eg locating GT sites should take account of reducing emissions from travel; design should include consideration of shading from trees, permeability of surfaces, increased future flood risk etc. If individual policies are to be picked out for cross-referencing, the environmental protection provisions of policy EM1 should also be included.</li> <li>2. Reference to rural exception sites is sensible. However, the reference to amending Green Belt boundaries in policy is neither necessary nor desirable. LAs could do this if necessary without being told in RSS that they can, and shouldn't be encouraged to do so unless there is no other option. Para 12 provides sufficient guidance. Otherwise GB policy may be seen to be undermined.</li> </ol> <p>The policy as it stands actively promotes considering the provision of sites in the Green Belt, whereas para 12 much more closely reflects the provisions of RDF4 and PPG2. Either the reference to Green Belt in the policy should be removed, or replaced with the following sentences from para 12:</p> <p>"All other alternatives should be explored before Green Belt locations are considered. If</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		there is an identified need for a Gypsy and Traveller site in an area and no suitable sites outside the Green Belt boundary exist, in exceptional circumstances, limited alterations or sites inset in the Green Belt could be considered.”

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
CPRE North West	Yes	We would not wish to comment on the detail of the figures as we have not been involved in the process of deriving them or analysed the evidence on which they are based. However, we support the methods by which the figures have been derived, ie analysis of actual need, including consultation with Gypsy & Traveller and settled communities.

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
CPRE North West	We support the supporting text as it stands

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
CPRE North West	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
CPRE North West	-

## Cumbria County Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Cumbria County Council	No	<p>1.1 The idea of refining the existing Gypsy and Traveller Accommodation Assessment (GTAA) approach to the provision of new gypsy and traveller sites, by distributing them according to the needs of that community is considered to be a good one. However, the County Council are not convinced that the methodology adopted by 4NW in this case is sufficiently transparent, nor does it appear robust.</p> <p>1.2 It is of some concern that Table 7.2 and Interim Policy L6 propose for Cumbria: a total minimum additional permanent residential pitch requirement of 105 between 2007-2016 a total proposed provision of permanent residential pitch requirement of 179 at 2016; and a total minimum additional transit residential pitch requirement of 40 between 2007-2016</p> <p>1.3 These proposals are significantly higher than the equivalent figures shown in the Cumbria-wide Gypsy and Traveller Accommodation Assessment (GTAA) April 2008, which identifies: a total minimum additional permanent pitch requirement of 72 between 2007-2016; a total proposed provision of permanent residential pitch requirement of 146 at 2016; and a total minimum additional transit residential pitch requirement of 35 between 2007-2016 for Option 1, and 30 for Options 2 &amp; 3.</p> <p>1.4 It is not clear how the proposed figures in Table 7.2 of the Interim Policy L6 have</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>been derived. A robust methodology is needed that would be compatible with the rigors and intents of Policy L1 in the issued North West Of England Plan - Regional Spatial Strategy to 2021. In this case, Policy L1 requires an assessment of local community's demographic, cultural, educational , skills &amp; training and health needs.</p> <p>1.5 Consequently, it is expected that the scale and distribution of gypsy and traveller pitch provision should therefore match that identified in the Cumbria-wide Gypsy and Traveller Accommodation Assessment (GTAA) April 2008 (see pages 111 &amp; 124). This GTAA provides a robust and up-to-date evidence base. It is considered that the figures identified in Table 7.2 are too high, and should be revised downwards, unless or until clear demonstrable evidence indicates otherwise. Furthermore any future provision should be better tied into existing strategies at a local level.</p> <p>1.6 With regard to the transit pitches, Table 7.2 allocates no sites to the Lake District National Park, but still identifies a need for 40 pitches across Cumbria, with most provision in Carlisle and Eden. This contrasts with the Cumbria GTAA, which identifies a requirement for 35 transit pitches (see page 124), within three different options based on either: an equitable share across each Local Authority area; existing encampments; and known population. Whilst it is fair to say that Cumbrian Authorities have not yet come to any joint decision about which option in the GTAA is preferable , the three options do offer a significantly different distribution in each case. This flexibility is considered preferable to a prescriptive one-size fits all approach as presented in the draft Table 7.2.</p> <p>1.7 It should be borne in mind that the figures in Table 7.2 are minimums. Should further evidence come forward to indicate that identified needs in a specific location are not being met, further provision may need to be made available . This approach would give Local authorities the flexibility to plan according to needs identified at any one point in time.</p> <p>1.8 It is also of some concern that Policy L6 is proposing an additional annual 3%compound increase in the level of overall residential pitch provision, equivalent to at least 351 additional pitches between 2016 and 2021. Given that Government guidance contained in PPS3 - 'Housing' requires regional planning bodies and local planning</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>authorities to prepare a robust evidence base in order to support policies and proposals, it is not clear how the approach suggested in draft Interim Policy L6 could be considered consistent with national policy guidance, or where the evidence exists to support such a prescriptive approach. Instead, it is considered that Policy L6 should be amended to state simply that a review of existing sub-regional gypsy and traveller accommodation needs should be carried out in 2016, and that these revised findings should form the basis of future requirements beyond 2016 in the LDFs, in accordance with the Plan, Monitor and Manage approach in PPS3.</p> <p>1.9 With regard to the reference in Policy L6 to the provision of temporary accommodation in connection with festivals, it is recommended that this should best be left for the explanatory text.</p> <p>1.10 It is also considered inappropriate to suggest in Policy L6 that Local Planning Authorities should use rural exception site policies where necessary to make required levels of provision. PPS3 is explicit in that exception site policy can only be used to enable small sites to be used specifically for affordable housing in small rural communities that would not normally be used for housing because, for example, they are subject to policies of restraint. PPS3 goes on to state that rural exception sites should only be used for affordable housing in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households that are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed inclusive communities.</p> <p>1.11 With regard to Policy L6, it is considered that whilst the provision of gypsy and traveller sites should meet the identified needs of that specific community, they would not fit well with the specific requirements of PPS3, which makes the exception site policy exclusive to the provision of 'affordable' housing. Therefore the use of an exception site policy would not be appropriate in these circumstances.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Cumbria County Council	No	Please see the response to question 4.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Cumbria County Council	None other than as already stated in question 4.

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Cumbria County Council	None other than as already stated in question 4.

### 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Cumbria County Council	None

## Friends, Families and Travellers and Traveller Law Reform

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Friends, Families and Travellers and Traveller Law Reform	Yes	FFT generally supports this policy as it is in line with government policy and seeks to make provision throughout the region. However we feel there should be encouragement in the policy to ensure that needs are met on the ground in a reasonable period and in an appropriate and suitable manner. We feel that encouragement for councils to develop suitable DPDs as soon as possible should be emphasised. We agree that a coordinated review of GTAAs should be undertaken in 2013. We agree that temporary provision should be made for festivals or similar events

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Friends, Families and Travellers and Traveller Law Reform	Yes	<p>FFT is glad that some allowance has been made for hidden and concealed households above and beyond the GTAA figures. This is a very sensible approach which should help to go some way to meeting these hidden needs. We are glad that nearly all councils will have to make some provision to help to widen the locational choice available to Gypsies and Travellers.</p> <p>The numbers put forward represent a move forward in interpretation of GTAAs and recognises their flaws.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Friends, Families and Travellers and Traveller Law Reform	<p>We support most of the supporting text - it highlights the urgent need to address the shortage of accommodation and aims to ensure that gypsies and Travellers have equal access to decent and appropriate accommodation like everyone else. We agree that choice should be widened and support this move. FFT and TLRP support the way this has been handled because it means that identified needs can be met on a meeting 'needs where it arises' basis in the first instance.</p> <p>It is inevitable that the broad current patterns of location of Gypsy and Traveller households will remain broadly the same in the future. We support the widespread provision for transit accommodation. Without this we fail to see how Gypsies and Travellers can continue to travel and how the aims of Circular 1/2006 can be met. We agree that a degree of flexibility is necessary in transit provision to meet the variety of needs. This should be developed side by side and in consultation with those likely to use such sites. All the advice we have received from Gypsies and Travellers is that sites should be well related to services and a reasonable distance away from them. Too often sites have been poorly located leading to isolation and all its ills. Ensuring adequate pitch size is very important and will do much to ensure that a proportion of the unauthorised encampments can be accommodated on existing sites. All the advice we have received from gypsies and Travellers is that visitors should be accommodated on their own pitches which of course means larger pitches. Business use of sites is important and vital to the development of a successful Gypsy and Traveller economy. Without such provision the economic vitality of the community will be threatened.</p> <p>We agree that rural exception sites may be needed and that in some areas consideration may be needed to be given to limited alternatives or insets within Green Belt.</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Friends, Families and Travellers and Traveller Law Reform	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Friends, Families and Travellers and Traveller Law Reform	-

## Fylde Borough Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Fylde Borough Council		Fylde Borough Council

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Fylde Borough Council	No	The Council has seen no tangible evidence to suggest that there is a need for additional sites for gypsies and travellers over and above the conclusion of the Lancashire GTAA.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		The Council has recently granted planning permission for 6 pitches and considers that this has resolved current demand. This exceeds the estimated provision contained within the Lancashire GTAA with which the Council would be happy to accept.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Fylde Borough Council	-

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Fylde Borough Council	-

### 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Fylde Borough Council	-

## GONW

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
GONW	No	<p>Whilst GONW generally support the policy we have the following comments</p> <ul style="list-style-type: none"> <li>• A key concern is that need can be met within the region. Whilst GONW supported the option for a more equitable distribution of pitch numbers based on need and the requirements of the Gypsy and Traveller community, it is not clear how the current distribution has been achieved and whether it results in a more equitable distribution</li> <li>• There needs to be a clear, robust and transparent evidence base in order that the overall numbers of pitches can be defended at EiP. There are concerns that currently the evidence base is not robust and this may lead to pitch numbers being reduced through local challenges, leading to insufficient pitches being available overall for the region</li> <li>• In specific terms the introductory text could provide an overarching introduction to both the Gypsy and traveller and Travelling show people sections without the need for its wholesale repetition</li> <li>• In relation to paragraph 2 of the introductory text suggest the addition of "mixed" in relation to inclusive communities and also in relation to "principles of sustainable development" consider the addition of text " where they have access to</li> </ul>

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
		<p>facilities and services”</p> <ul style="list-style-type: none"> <li>• Suggested rewording of 5th paragraph “Sites should be identified having regard to circular 01/06 and PPS3, the spatial principles and relevant priorities set out in RDF1 and 2, DP policies and policies RDF4, EM5 L1 and L5”.</li> <li>• In the next to last paragraph, there are some concerns that the text could imply that Green Belt alterations and rural exceptions could be considered almost as a matter of course. The supporting text clarifies that such approaches can only be considered in specific circumstances</li> <li>• PPS 3 provides further clarification of the circumstances when rural exceptions can be considered and whilst supporting text does not need to repeat national guidance it should provide reference to PPS3 or ensure it reflects most recent guidance</li> <li>• In relation to the Green Belt references, there is a concerns that the current wording of the policy may appear to undermine <ul style="list-style-type: none"> <li>i. the permanence of the Green Belt and may lead to potential conflict with RDF4. PPG2 makes it clear that such uses are not an appropriate use of the Green Belt and that boundaries should only be altered in exceptional circumstances</li> <li>ii. the sustainability of sites and the ability to access to services and facilities</li> <li>iii. the ability of Gypsy and Traveller communities to be part of mixed inclusive communities</li> </ul> </li> </ul>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
GONW	No	Whilst we have no specific comments on the individual figures of LAs, we have already outlined our concerns about the availability of a transparent evidence base and the robustness of regional figures following likely local challenge. Having supported the option which allowed for some redistribution, we are also concerned about whether the proposed distribution leads to a more equitable distribution of pitch numbers.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
GONW	see comments as at 4

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
GONW	The supporting text does not make reference to the ability to grant temporary permissions to address need where DPD site allocations are under preparation. Such actions could assist in meeting needs in the short term through the development management process.

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
GONW	No

## Halton Borough Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Halton Borough Council	No	The 'No' response is justified on the basis that the policy does not adequately address the issue of distribution in the policy wording. Currently there is no acknowledgement of the fact that the last round of consultation in July 2008 concluded that provision for Gypsies and Travellers should be undertaken by way of a more balanced share of provision across districts. This approach sought to see pitch provision distributed to meet the requirements of Gypsies and Travellers. During the July 2008 consultation this approach was known as 'Option 3'. For the purposes of clarity and avoidance of doubt, the policy text should acknowledge that this is the basis upon which pitch provision will be made and monitored.

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Halton Borough Council	No	<p>"the Council currently provides 23 pitches at Riverview Residential Caravan Site in Widnes. A new local authority run site was opened in January 2009 in Warrington Road, Runcorn. This new site provides 4 permanent pitches and 10 transit pitches. There are 2 private sites in Runcorn at Windmill Street and Warrington Road; these 2 sites provide 13 pitches. In total there are 40 permanent pitches and 10 transit pitches currently provided in Halton.</p> <p>In order to understand the origins of the provision figures it is necessary to review the evidence compiled for the North WEst Region. All sub-regions in the North West were surveyed by the Salford Housing and Urban Studies Unit (SHUSU) of the University of Salford who prepared Gypsy and Traveller Accommodation Assessments (GTAAAs). The study for the Cheshire Partnership Area was undertaken in May 2007 and covers the Cheshire Authorities that will form the two new unitary authorities of West Cheshire and East Cheshire plus Halton, Warrington and St Helens. A GTAA study for the whole North West was also published in May 2007 by SHUSU. In comparing the two studies, there is a difference in total identified need for the Cheshire Partnership area. In the Cheshire Study (table 37 page 125) total need is identified as 113 - 155. However, in the Regional Study the figure for the Cheshire Partnership area is shown as 140 - 177 (table ii, page 8 of the Executive Summary). It is not clear why the figures between the studies differ as the Regional Study indicates that figures are drawn from the Cheshire Study. For Policy L6, the figures resulting from the Cheshire Study should be used as the starting point for the RSS pitch apportionments made under Policy L6.</p> <p>The Cheshire Partnership study concludes that the need for Halton will be 28 to 32 pitches from 2006 to 2016 (table 37 page 125). These pitch figures arise from the following sources: 3 from concealed households (adults / families living with extended family / other families), 3-6 from unauthorised encampment, 1-2 from household formation (young person approaching family age), 1 from bricks and mortar (householder wanting to move back into a caravan) and 20 from the Riverview waiting list (an issue considered in more detail below). In terms of the families in bricks and mortar in Halton, and the implied need arising from the fact that a proportion 'may' want to live on a site, there are serious economic consequences to building controversial developments on the off chance that there might be a demand. Most (although not all) Travellers go in to bricks and mortar when they are too old or ill to continue travelling. The evidence also suggests that 10 pitches will become free and can be re-let and therefore this figure of 10 has been deducted from overall needs. The</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>figures quoted for each authority in table 7.2 of Policy L6 do not take account of estimated vacancy rates and re-lets (contributing to supply) on existing sites during the period. The Cheshire GTAA assessed this as 10 for Halton, which should be netted off any target.</p> <p>Analysis of figures from the other authorities in the Cheshire Partnership area indicates that, with the exception of Congleton(with 4 on its list), only Halton put forward its waiting list for pitches. It is important to note that only local authority sites tend to have waiting lists and the only local authority sites in the Cheshire Partnership area are Halton, St Helens and Congleton. This lack of consistency with the evidence skews need artificially towards Halton. To recap, the need for Halton was 28-32 pitches; however, 20 of these pitches arose from the use of an unmanaged waiting list. This latter point is important as more than half of the assessed need (20) for Halton arises from the waiting list for the Council's residential Traveller Site, by far the highest in the Region. This is not a waiting list in the traditional sense, but simply an un-vetted list of expression of interest. The Riverview Site list had 40 names on it however the Cheshire Study assumes only 50% of the list is unfulfilled need so a figure of 20 is used to predict need. This is because some of these families will have permanent pitches elsewhere but want to relocate; others will feature in demand figures for other areas as well (double counting). It is important that the assessment of need is based on a realistic understanding of the demand for pitches, assuming 50% of an unmanaged list is not sound evidence of need. With regard to waiting lists in general, it is hard to believe that the few Councils that hold a list are penalised in the assessment. In response to this consultation the Council has reviewed the Riverview Site list by speaking to those on it. The revised list has 10 names on it and these represent the current people asking for a pitch, claiming not to have a permanent pitch elsewhere and who would take one today if available. The Council will make this list available to 4NW on a confidential basis to allow the evidence base to be updated with current information.</p> <p>To understand how Halton is allocated an additional pitch provision of 60 pitches under Draft RSS Policy L6 it is necessary to consult 'A Technical Note on the Interim Draft Policy Figures', published February 2009. Here it is explained that the RSS apportionment in Policy L6 has been derived from the GTAA evidence bases, consultation feedback and 4NW professional judgement. The starting point is to examine the evidence. The North West Regional Accommodation Assessment Executive</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.														
		<p>Summary showed that the provision needed in the Cheshire Partnership area was 140 - 177 ( a different figure to the Cheshire Study) additional permanent pitches by 2016 (table ii page 8). However, RSS Policy L5 indicates that minimum additional provision in the Cheshire Partnership area will be 300 from 2007- 2016. Therefore, evolution from evidence to policy has increased the Cheshire Partnership figure by between 70 - 114%. These increases are not supported by hard evidence . In a note of a meeting held with Gypsies and Travellers on 19th December 2008 it was reported that the figures for Macclesfield, Ellesmere Port and Neston, Vale Royal, and Chester were very under-estimated. There was no mention of the current provision in Halton being a cause for concern. The meeting record adds that 4NW felt that as a result of these discussions the figures should be subject to an additional 70% uplift to take account of the hidden need identified by the meeting. This is how the figure of 300 pitches has been derived for the Cheshire Partnership area within the RSS Policy (177 plus 70%). It is important to remember that the Cheshire Study did take account of 'hidden need' through its methodology that actively sought to identify hidden need.</p> <p>This RSS 70% uplift approach is not acceptable as the Cheshire Study did take account of concealed and latent demand, and should not be amended without clear evidence. Policy L6 should revert back to the Cheshire Partnership study figures and proportion these on a basis in line with the wishes of the Gypsy and Traveller community. The Cheshire Study identified that the Gypsy and Traveller community had suggested locations in Middlewich, Ellesmere Port, Winsford, Nantwich, Sandbach and the outskirts of Chester as locations of choice. Liverpool also appears to be a location of choice. At eh 19th December 2008 meeting it was recorded that 'many people still want to be in Liverpool but are being pushed out into Runcorn.' This statement would indicate that a greater proportion of pitch provision should be in the Merseyside Partnership area (Knowsley, Liverpool, Sefton and Wirral). A key question for 4NW is why has Cheshire's assessed need been doubled? There seems to be an approach whereby Councils with little or no existing provision have been given token targets, and those with existing provision have been given substantially larger targets. Policy should follow the evidence. The draft RSS policy figure of 300 across the Cheshire Sub-regional Partnership has then been apportioned, by no scientific method, to all those authorities in the Cheshire Partnership. This results in the following apportionments:</p> <p>Table 1: Comparison of Sub-Regional Proposals with Cheshire Evidence. Cheshire</p> <table border="1"> <thead> <tr> <th>GTAA</th> <th>RSS Proposals</th> <th>LA</th> <th>Permanent</th> <th>Transit</th> <th>Permanent</th> <th>Transit</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	GTAA	RSS Proposals	LA	Permanent	Transit	Permanent	Transit							
GTAA	RSS Proposals	LA	Permanent	Transit	Permanent	Transit										

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.																								
		<p>Cheshire East 37-54 80 10 Cheshire West 31-45 80 10 Halton 28-32 60 5 Warrington 6-9 35 5 St Helens 11-15 45 5 Total 113-155 25-37 300 35</p> <p>In Interim Policy L6 the Halton apportionment figure has been given as 60 pitches. This represents 20% of the sub-regional apportionment. This represents one fifth of the requirement, yet there are 9 authorities in the Cheshire Partnership. Halton is the smallest of these 9 partners in terms of geographical area and has little land available to accommodate further provision. Some account should also be taken of provision in the context of the geographical size of Councils, which could result in neighbouring authorities' targets being increased relative to Halton. There is little land available in Halton upon which to accommodate such large numbers of pitches. In terms of current pitch provision, only Congleton and St Helens provide more pitches than Halton. In terms of equity and choice greater provision should be made in other districts where the Gypsy and Traveller community wish to settle to ensure sustainability, but not to the extent that some Council's have to do nothing. Table 2: Geographical Size of Cheshire Partnership Authorities.</p> <table border="0"> <tr> <td>Name</td> <td>Hectares</td> <td>Halton</td> <td>9033</td> <td>Macclesfield District</td> <td>52498</td> <td>Chester District</td> <td>44833</td> <td>Crewe and Nantwich District</td> <td>43041</td> <td>Vale Royal District</td> <td>38330</td> </tr> <tr> <td>Congleton District</td> <td>21099</td> <td>Warrington</td> <td>18237</td> <td>St Helens</td> <td>13638</td> <td>Ellesmere Port and Neston District</td> <td>10952</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Some attempt should be made to redistribute the assessed need for pitches to ensure a more even provision between Councils, particularly to those who have little or no existing provision (Ellesmere Port and Neston, Knowsley and Wirra), and should also focus on those Councils with no Council owned sites. The 'need where it is seen to arise' problem is greatest for those LAs that have sites. DCLG (Department for Communities and Local Government) advice to regional planning bodies, contained in 'Preparing Regional Spatial Strategy reviews on Gypsy and Travellers by regional planning bodies' page 51, advises that equity considerations suggest that pitch requirements might be dispersed from Authorities with existing provision to those with little or no provision.</p> <p>Any provision for Halton should be reduced by the numbers of pitches included in the new development in Runcorn that comprises 4 permanent pitches and 10 transit pitches (opened since the GTAA was completed). Consequently the assessed need should reduce accordingly. It is accepted that this development occurred after the needs</p>	Name	Hectares	Halton	9033	Macclesfield District	52498	Chester District	44833	Crewe and Nantwich District	43041	Vale Royal District	38330	Congleton District	21099	Warrington	18237	St Helens	13638	Ellesmere Port and Neston District	10952				
Name	Hectares	Halton	9033	Macclesfield District	52498	Chester District	44833	Crewe and Nantwich District	43041	Vale Royal District	38330															
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<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>assessment that informed RSS figures. It is understood that as the Interim Draft RSS Policy L6 has a starting date of 2007 this provision will be taken into account in considering Halton's apportionment.</p> <p>For the above reasons, Halton do not feel that the evidence produced to support Interim Draft Policy L6 substantiates the pitch provision figures for Halton. Greatest provision should be made in the areas highlighted by Gypsy and Traveller communities and those authorities currently offering no local authority run sites."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Halton Borough Council	The supporting text should clearly support Option 3 in terms of the distribution of pitch figures. Paragraph 5 needs to be reworded to support the actual rationale behind Policy L6, or more appropriately, Policy L6's pitch provision altered to reflect the rationale in paragraph 5

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Halton Borough Council	Yes, we would like 4NW to consider our recently reviewed waiting list for Riverview Residential Caravan Site and take this into account as updated evidence. Please email <a href="mailto:steve.williams@halton.gov.uk">steve.williams@halton.gov.uk</a> to request this information.

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Halton Borough Council	No.

## South Ribble Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Planning and Housing, South Ribble Borough Council	No	<p>Central Lancashire Authorities Response to 4NW Accommodation for Gypsies and Travellers: Interim Draft Policy L6- Scale and Distribution Accommodation of Gypsy and Travellers Pitch Provision Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L6; and accept the need to provide a certain level of additional pitches for gypsies and travellers. However the Central Lancashire authorities do object to the Gypsy and Travellers proposed pitch distribution and numbers identified for each authority. Lancashire Sub Regional Gypsy and Traveller Accommodation and related Services Assessment 2007</p>

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
		<p>2 A GTAA identifies future needs, the Regional Spatial Strategy translates this into figures per local planning authority and local authorities identify sites to meet this need in development plan documents prepared through the local development framework.</p> <p>3 A series of GTAAs, including one for Lancashire were commissioned in 2007 by the North West Regional Assembly. These were carried out by Salford Housing and Urban Studies Unit, part of Salford University.</p> <p>4 The findings of the GTAA were reported to the Lancashire Leaders and Chief Executive’s meeting in April 2007 prior to the final report being produced in May 2007.</p> <p>5 Existing Pitch Provision- Preston has an official Gypsy and Traveller site at Leighton Street. This is owned by Lancashire County Council but managed on their behalf by PCC Estates. The site has 12 pitches and could possibly be extended to accommodate a further 5 pitches.</p> <p>6 The Leighton Street site is occupied entirely by one ethnic group – Irish Travellers. This is a fairly settled group and proposals in the GTAA recognised that the primary need was to meet the future accommodation requirements of this group.</p> <p>7 Survey work carried out for the GTAA indicated that there were 3 pitches in unauthorised developments across Preston. The occupants of these require authorised residential development.</p> <p>8 Neither South Ribble Council nor Chorley Council has an existing official Gypsy and Travellers site within their local authority boundary</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
Planning and Housing, South Ribble Borough Council		<p>"GTAA Recommendations (May 2007)</p> <p>9 The GTAA recommended for Preston that, in addition to the 12 pitches on site at Leighton Street there should be a further 18 – 21 pitches provided by 2016. The rationale behind this was: Pitches</p> <p>Unauthorised Development:</p> <p>3 Concealed Households:</p> <p>4 New household formation*: 10.1 – 10.5 Households currently in bricks and mortar**: 0.95 – 3.15 Total 18.05 – 20.65 *This is identified as 6 up to 2011 and then a multiplier is applied for the period 2011 -2016 giving a range of 4.1 – 4.5. **This is based on a percentage estimate based on findings that between 19% and 63% of the G &amp; T population currently in bricks and mortar accommodation (mainly Ribbleton) are likely to move back into caravan accommodation.</p> <p>10 The GTTA indicated that no pitches were needed in South Ribble or Chorley for Gypsies and Travellers.</p> <p>11 The basis of the nil requirement for Chorley and South Ribble in the Lancashire Gypsy and Traveller Accommodation Assessment is that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. In other words there was no evidence that pitches were needed.</p> <p>12 South Ribble’s records show they had one brief visit by travellers in early 2007 who were in transit to another destination.</p> <p>13 Chorley Council’s records show that since 2007 there have only been 1 or 2 brief visits by travellers who were in transit to another destination.</p> <p>14 Overcrowding- It is also noted in May 2007 that CLG published “Local authorities and Gypsies and Travellers: a guide to responsibilities and powers”. At paragraph 20 it identifies in February 2005 that CLG issued interim guidance on how to conduct accommodation needs assessments, which set out some key principles to be followed. In paragraph 22 it outlines the key principles needed to underpin any good quality accommodation assessment. These include that accommodation assessments need to look at both the current shortfall in accommodation as well as projections of future growth. The guide states, “there are real issues about overcrowding and suppressed household formation in the Gypsy and Traveller communities, just as with the settled</p>

**Organisation:**

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

community. The assessment should capture this".

15 It is obvious overcrowding has been an issue for some time and that this information could have been gathered when the accommodation needs assessment was being undertaken or prior to the further consultation that took place in June 2008 and/or prior to the additional consultation with Gypsies and Travellers in November 2008. 4NW Consultation Allocation (January 2009)

16 The table below gives a comparison of the GTAA and 4NW pitch provisions allocations in Lancashire. Local Authority Current authorised provision  
 Additional GTAA proposed to 2016 Additional 4NW permanent proposed to 2016 Additional 4NW transit proposed to 2016 Total 4NW additional proposed

	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches
Darwen	48	69-83	60	5	65	Blackpool	51	24	10	5	15
Burnley	0	6-7	20	5	25	Chorley	0	0	10	5	15
	0	1.0	10	5	15	Hyndburn	86	30-33	45	5	50
Lancaster	142	29-30	45	5	50	Pendle	0	2	15	5	20
Preston	12	18-21	45	5	50	Ribble Valley	0	6	10	5	15
Rosendale	0	0	10	5	15	South Ribble	0	0	10	5	15
West Lancs.	0	17	20	5	25	Wyre	0	0	10	5	15
	339	202 - 224	320	70	390						Total

17 The 4NW consultation report proposes an additional 45 permanent residential pitches in Preston by 2016 giving, with the existing provision at Leighton Street, a permanent provision of 57 pitches. In addition to that 4NW propose an additional 5 transit pitches.

18 The 4NW consultation report proposes a new provision of 10 permanent residential pitches and 5 transit residential pitches for both South Ribble and Chorley Councils to 2016.

19 In addition beyond 2016 to 2021 provision should be made across the region for an annual 3% compound increase in the level of overall residential pitch provision. This would mean that Preston would need to provide an additional 54 permanent residential pitches and 6 transit residential pitches up to the period 2021, South Ribble and Chorley Councils will need to identify 12 permanent residential pitches and 6 transit residential pitches to the period 2021. These pitch provision figures are not a maximum provision as best practice suggests that the pitch provision figure should be rounded up in 5's.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>This also allows for fool proofing for the future.</p> <p>20 The Central Lancashire authorities consider information on the collection of the evidence base is not up to date as the GTTA is only robust enough to go to 2016. What evidence is there that the annual 3% compound increase beyond 2016 is the annual growth rate that should be applied?</p> <p>21 It is considered there are a disproportionate number of pitches proposed in Lancashire compared to Merseyside and Greater Manchester, where it is understood the greatest need/demand lies.</p> <p>22 The only authorities to benefit from the 4NW proposal compared with the GTAA figures are Blackburn with Darwen and Blackpool. It is unclear why this is the case?</p> <p>23 The overall additional provision proposed by 4NW, including transit pitches, represents an increase above the range proposed in the GTAA of between 74% and 93% depending on whether the higher or lower range figures from the GTAA are used. It is difficult to understand the methodology or on what basis this has resulted in this overall increase. Where is the justification for an increase of this magnitude? The Central Lancashire authorities do not accept that an increase from 200 pitches (GTAA figure to 2016) in Lancashire to nearly 400 pitches (4NW figure to 2016) has resulted because of undercounting and overcrowding/doubling up on existing sites. There does not seem to be any hard evidence on these issues.</p> <p>24 The permanent residential requirements of 12 pitches (compound by 3%) for South Ribble and Chorley Councils are the lowest pitch requirements (6 authorities have this requirement) within Lancashire but there is no comparison to the nil local requirements established in the GTAA. The transit pitch requirement is the same as the rest of Lancashire – 5 pitches for every local authority, and within the Lancashire - wide requirement established by the GTAA."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
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Organisation:	5. Do you have any comments to make about the supporting text?
<p>Planning and Housing, South Ribble Borough Council</p>	<p>"Technical Note on how the Interim Draft Policy Figures were derived (February 2009)</p> <p>25 The 4NW technical note confirms the GTAA study recommended that the identified needs did not necessarily mean they should be met in specific localities and that decisions about where need should be met should be taken on a strategic basis through partnership working between regional and sub regional/local organisations. This included the consultation stages on the 3 options undertaken in June 2008 and clear support for option 3 working with sub-regional partnerships and the Gypsy and Traveller Community to agree a more balanced share of meeting need across districts, reflecting a wider range of factors other than solely the "need where it arises" basis.</p> <p>26 This work with sub regional partnerships and the Gypsy and Traveller Community has seen pitch provision distributed to meet the requirements for Gypsies and Travellers so that they have the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community and thus contribute towards community cohesion and sustainable communities.</p> <p>27 The Technical Note indicates that using the evidence base and feedback from the consultations 4NW officers then made a professional policy judgement to come up with an initial set of pitch provision. The technical note states "this is not based on a precise mathematical formula". The Central Lancashire authorities question this "professional judgement".</p> <p>28 Following online consultation on a set of pitch provision (Nov/Dec 2008), 4NW issued a further revised provision as set out in Policy L6, Table 7.2. The level of provision now reflects the needs of those currently resident in the North West on pitches/sites without planning permission, anticipated natural growth and net movements between pitches and other forms of accommodation. This also addresses "hidden " overcrowding on existing sites and concealed Gypsy and Traveller households who currently reside on other caravan sites and holiday parks who remain undetected in GATT's. The Technical Note indicates "Once again, it should be noted that the Interim Draft figures are not based on a precise mathematics formula".</p> <p>29 The Central Lancashire authorities again question this "professional judgement" as there is no audit trail where these figures have come from. How does the more equitable distribution of pitches reflect where Gypsies and Travellers want to live? As there is not enough evidence and concise information, 4NW surely cannot make a sound judgement.</p> <p>30 Why is it that the comprehensive GTAA missed the overcrowding issues on existing sites? Why was overcrowding and hidden issues not considered earlier and examined before the main consultation stages arose?</p> <p>31 It is still considered the Technical Note does not present enough detail/evidence as to why 4NW's extended the figures from those in the GTAA to the ones in the current RSS partial review consultation. It is questionable whether "professional judgement" is enough. The increase is apparently as a result of the closed consultation exercise that was held in November 2008. The results of that consultation presented on 4NW website show in fact that most of the comments posted either reject the figures being put forward by 4NW, or if they do accept them do so on the basis that they reflect the GTAA figures. There needs to be transparency in how the 4NW figures have been reached. There needs to be clarity on what is the actual level of existing provision and why there is such a discrepancy between the papers issued in August 08 and January 09?"</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Planning and Housing, South Ribble Borough Council	<p>"Other Issues</p> <p>32 How do we know the extent of Gypsy and Traveller households living on other kinds of sites?</p> <p>33 Why is it necessary to seek to house all Gypsy and Traveller households on dedicated sites rather than allowing continued use of other sites (subject to the general restrictions on the use of holiday homes)?</p> <p>34 Why is it imperative that we meet all possible housing requirements when for the settled community there is a large gap between housing needs and what can be delivered?"</p>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Planning and Housing, South Ribble Borough Council	<p>"Ethnic Groupings</p> <p>35 The Gypsy &amp; Traveller population in Preston is made up of Irish Travellers and the GTAA in making its recommendations focused on the future accommodation needs of this ethnic group. There is no indication that those needs have more than doubled since the GTAA was produced. Turnover</p> <p>36 Neither the GTAA, nor the 4NW figures appear to take into account turnover of existing pitches. While these may be relatively settled populations with little movement the issue of turnover should be addressed to ensure that the proposed pitch allocations are not in fact an over-provision. Definition of a transit pitch</p> <p>37 More detail is required on what would be classed as meeting the requirements for transit pitch provision? The draft Partial Review RSS policy proposes that in addition to permanent pitch provision, each of the Lancashire authorities provides 5 transit pitches. These are described as potentially including:</p> <p>38 Larger pitches on residential sites provide the potential to meet the needs of short term visitors. Formal transit sites</p> <p>Less-equipped 'tolerated' stopping places used on a regular basis</p> <p>Temporary sites with temporary facilities available during an event, family gathering or for part of the year.</p> <p>Central Lancashire Authorities Requirements</p> <p>39 The Central Lancashire Authorities of Preston City, South Ribble and Chorley Councils do not accept the</p>

<b>Organisation:</b>	<b>7. Any other comments?</b>
	interim draft pitch provision figures and consider interim Draft Policy L6 and Table 7.2 should be simplified to identify exactly what pitch provision figures 4NW require to the period 2021. 40 In the absence of any other evidence, consistency and clarity the Central Lancashire authorities continue to support the GTAA recommendations."

## Heine Planning

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Heine Planning, 10 Whitehall Drive, Northwich, Cheshire	Yes	The allowance recognises the shortcomings of the GTAA assessment and difficulties of assessing latent/ hidden need. It will help make up the shortfall of provision and need arising. In the process it may also offer an element of choice. Gypsy-Travellers should have choice as to where they live and not feel 'trapped' by the lack of choice available.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Heine Planning, 10 Whitehall Drive, Northwich, Cheshire	Yes	I am hopeful the proposal will ensure adequate provision plus some redistribution. This should ensure that provision is made to meet existing unauthorised developments where need arises with out forced relocation to other districts (as I fear could happen in the E and SE region) whilst also providing a small adjustment and redistribution of provision to provide a degree of choice/ broaden choices – well done.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Heine Planning, 10 Whitehall Drive, Northwich, Cheshire	This is a thoughtfully considered report, sensitive to the issues raised

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Heine Planning, 10 Whitehall Drive,	Para 8 addressed matters to consider in site selection. I would add provision for stabling and keeping of horses. For some Gypsy-Travellers this is integral to their traditional way of life and local authorities should be encouraged to identify sites where scope exist for associated stabling/ paddocks for keeping of horses. In my

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Northwich, Cheshire	experience few Gypsies use their sites for any commercial uses other than the overnight parking of their works vehicles. Horse dealing / trading is the one exception and for those who are horse dealers they do want some stabling on site for foaling and preparing horses for shows/ travelling.

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Heine Planning, 10 Whitehall Drive, Northwich, Cheshire	Para 7 Transit arrangements I consider this a very important aspect of provision I strongly support the suggestion that residential sites be designed to meet the needs of short term visitors. In my experience most mobile families prefer to stop with family than on sites with families they do not know. I also support the suggestions for other transit provision.

## Hyndburn Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Hyndburn Borough Council	No	

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
Hyndburn Borough Council	No	<ol style="list-style-type: none"> <li>1. The Borough continues to have concerns around the inequitable distribution of pitches across Lancashire.</li> <li>2. The <b>existing pattern of provision</b> clearly fails to give the Gypsy and Traveller community access to the decent and appropriate housing options that are available in Lancashire to other members of the community or to other racial groups. Presently 9 of the 12 Lancashire districts make no provision whatsoever and a further 1 of the 12 districts provides only 12 pitches. We are aware of no tenable justification for this.</li> <li>3. It is our view that <b>the failure to address this issue has been both systematic and comprehensive</b>. While this is partly a matter for the local councils concerned the responsibility does not rest with them alone. It is our view that there has been no effective intervention, or even any attempted intervention, by any of the bodies that could have played a part through their roles in regulation, guidance or inspection.</li> </ol>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>4. As a consequence of the above, we are concerned that the existing pattern of provision leaves the Region open to a challenge of <b>institutional racial discrimination</b>.</p> <p>5. <b>Projections and allocations that are based on the existing discriminatory pattern of provision will themselves be discriminatory.</b> This includes the GTAA and its associated estimates of future need. For this reason, the use of information from the GTAA needs to be considered within the context of the wider responsibility of public policy makers to uphold statutory responsibilities and redress inequalities when these are found.</p> <p>6. If implemented, the latest allocations would not only fail to address the inequitable distribution of available sites – but <b>would actually worsen the position by widening the gaps in provision and adding to the inequity</b>. It is important to note that this would continue to deny access to the range and availability of housing options that are offered to all other members of society.</p> <p>7. For a number of other purposes <b>Pennine Lancashire</b> (Blackburn, Burnley, Pendle, Rossendale, Ribble Valley and Hyndburn) <b>is identified as a single 'cluster'</b> within Lancashire. This is strategically reflected in a number of ways including the Housing Market Renewal area, the Pennine Lancashire Housing Strategy, the recently adopted Multi-Area Agreement and the formation of a Pennine Lancashire Development Company. Similar 'clusters' are recognised elsewhere in Lancashire.</p> <p><b>8. Policy Aim 11 of the Pennine Lancashire Housing Strategy (Final Draft) states:</b></p> <p>a. "It is clear that NWRA expects groups of local authorities to be proactive in developing targets and proposals to meet the accommodation needs of Gypsies and Travellers. The Pennine Lancashire Authorities will work collectively and in partnership with the other Lancashire Authorities on this part of housing and planning policy."</p> <p>9. <b>The travelling distances between districts within each of the clusters are very small, and the administrative boundaries are often indistinct.</b> It would therefore be possible to redress the current inequalities by ensuring adequate provision within and between the clusters. The RSS can start to tackle (rather than reinforce) the existing discriminatory patterns of distribution if it focuses on those areas that have so far denied access to appropriate housing options for the Gypsy and Traveller community. This approach would have the added benefit of keeping</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>short travelling distances between settlements.</p> <p>10. <b>Hyndburn is the Smallest geographic Borough in Lancashire.</b> The area currently provides 86 pitches on 11 sites.</p> <p>11. <b><u>The number of pitches provided in the Borough is higher than the whole of the Cumbria sub-region and the whole of the Merseyside sub-region.</u></b> The Borough also provides more pitches than its much larger neighbours in Lancashire or Greater Manchester.</p> <p>12. <b>We are aware of no intrinsic characteristic of the Borough that would explain this position.</b> It is our view that the most likely explanation rests in the positions taken elsewhere that have been allowed to go unchallenged. It is essential that this inequity is redressed and that regional policy recognises and deals with this issue responsibly.</p> <p>13. We are aware of anecdotal evidence directly from the Gypsy and Traveller community that the <b>lack of provision elsewhere denies them any meaningful choice</b> about where to live. We believe that more work should be done on this issue.</p> <p>14. For all the reasons above we believe that <b>a GTAA based assessment is fundamentally flawed, and that it would reinforce the discriminatory pattern that has been allowed to go unchecked over many years.</b> The central issue needs to be how 'no-go zones' or 'reluctant providers' will be tackled and how the historical inequalities will be redressed.</p> <p>15. <b>With the above in mind Hyndburn would be prepared to accept a provision of 10 further pitches or the minimum number allocated elsewhere in the sub-region, whichever is the smaller. We have in mind that this allocation would be for the lifetime of the Plan.</b> We firmly believe that this is a responsible position and that, providing other areas are required take up their responsibilities too, it would allow the Borough to make an adequate provision for new household formation and growth, while accepting that some households would exercise the new choices available to them to live elsewhere. Given the proximity of the districts, we further believe that this choice can be established without undue detriment to any of the ties and business interests of the Gypsy and Traveller community.</p> <p>By allocating Hyndburn 10 (or the minimum equivalent) number of pitches, the RSS could also ensure that it does not widen the inequality gap in provision that</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		presently exists.

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Hyndburn Borough Council	We believe that far greater emphasis needs to be given to acknowledging the inequalities that exist and to setting out in the strongest possible terms a commitment by 4NW to redressing this as we go forward. This situation has been allowed to go unchallenged for too long and it is essential that Regional bodies play a full part in setting out the expectations for the future.

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Hyndburn Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Hyndburn Borough Council	You are aware that the identified need figures quoted for Hyndburn from the GTAA during the November 2008 on line consultation were incorrect and need to be revised. Our more general point is that the GTAA is itself best understood as a reflection of historical decisions, and can not be the basis for future planning as it is the product and embodiment of discriminatory practices.

## Knowsley MBC

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Knowsley MBC	No	We disagree with the pitch distribution figures. Although we agree that a co-ordinated sub-regional review of the GTAA should be undertaken by 2013, there seems to be little point if the findings of assessment are subsequently disregarded.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Knowsley MBC	No	<p>The reason for the difference in provision between the Merseyside GTAA and Table 7.2 is, according to the review's supporting text, "to address the issue raised by the Gypsy &amp; Traveller community of 'hidden' overcrowding on existing sites and concealed Gypsy &amp; Traveller households who currently reside on other caravan sites and holiday parks, who for various cultural and management reasons remain undetected in GTAA's". It is considered that the Merseyside GTAA adequately made provision for 'hidden' households. The small number of Gypsies and Travellers in the Knowsley during the past five years supports the evidence in the GTAA.</p> <p>It has been suggested that, from a management point of view, the number of pitches on a site should be between 10 and 15. It has also been suggested that in some instances the district requirement has been increased to 10 for this reason. The Communities publication Designing Gypsy and Traveller Sites Good Practice Guide suggests that the maximum number of pitches on a site should be 15 but it also states that sites of 3-4 pitches can be successful.</p> <p>The RSS requirement should be in line with the Merseyside GTAA, that is for 5 permanent pitches in Knowsley and 10 transit pitches across the area covered by the Merseyside GTAA. The requirement for individual authorities should not be artificially increased to a minimum figure. If an authority were to decide, for management reasons, to provide above the GTAA need; this figure should be set by the authority.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Knowsley MBC	The content of the supporting text is sufficient.

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Knowsley MBC	The evidence contained within the Merseyside GTAA should be reconsidered

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Knowsley MBC	-

## Lake District National Park Authority

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Lake District National Park Authority	Yes	From our perspective we support the allocation. However, we do not feel it necessary to include the reference in policy to rural exception sites for housing and green belt boundaries. these are adequately addressed in RDF4, PPS3 and Circular 01/2006 and would be better placed as explanatory text.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Lake District National Park Authority	Yes	Assuming the table reference is 7.2 we support the pitch distribution. However, as discussed with Michael Gallagher recently we would request that a reference is made to the LDNP in the table with a '0' allocation so the position is clear. This would help us to address Gypsy and Traveller accommodation needs in our LDF.

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Lake District National Park Authority	Addressing the 'hidden' need is an interesting challenge. This should take account of Community Strategies, strategic objectives and community expectations to ensure that the delivery of this accommodation need is equitable and in conformity with Local Planning Authority aspirations.

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Lake District National Park Authority	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Lake District National Park Authority	Paragraph 3 in policy L6 - 'The provision of temporary...' may be better placed as supporting text.

## Lancashire County Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Lancashire County Council		<p>Interim draft policy for Gypsy and Travellers</p> <p>Several issues arise from the interim draft policy. In relation to the principle of the policy:</p> <p>There is support in principle for the inclusion of a policy which sets out requirements for Gypsy and Traveller accommodation needs as required by Circular 1/2006, including requirements for individual districts.</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>It is accepted that the North West and Lancashire Sub regional GTAs identify a shortfall in provision of suitable accommodation for Gypsies and Travellers.</p> <p>Policies need to be founded on a sound evidence base and will be subject to examination in public. Paragraph 24 of Circular 1/2006 states that, "Regional Planning Bodies should maintain an up to date understanding of the likely strategic accommodation requirements of their area over the lifespan of the RSS, which should inform the preparation and review of the RSS."</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Lancashire County Council		<p>In relation to the specific requirements set out in the policy:</p> <p>The overall requirements for the North West and Lancashire are considerably in excess of the requirements identified in the GTAA. The supporting text to the policy states that in addition to the GTAA, an allowance is made to address the issue raised by the Gypsy and Traveller communities of hidden overcrowding and concealed households which were not covered in the GTAA. It is considered that such considerable increases need to be supported by clear evidence and that this should be made available as part of the consultation process to ensure that the overall figure is sound. In the absence of such information the levels of provision in the policy cannot be supported.</p> <p>The principle of having a wider distribution of provision to meet needs and to give greater choices to Gypsies and Travellers is supported. The interim draft policy sets requirements for areas in Lancashire where there is currently no provision thereby extending geographic distribution.</p> <p>The level of current and proposed provision (105 pitches) in Merseyside appears to be low in comparison with Lancashire (659 pitches), Greater Manchester (684 pitches) and Cheshire (578 pitches).</p>

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Lancashire County Council	<p>The distribution proposed in the policy needs to be supported by clear evidence of need. Further evidence regarding the geographic preferences of Gypsies and Travellers (as included in the Greater Manchester GTAA) may be required in this respect. The overall requirement for 70 transit pitches is within the range identified by the sub regional GTAA. The GTAA does not break down the transit accommodation requirements to district level</p>

Organisation:	5. Do you have any comments to make about the supporting text?
	due to "the need to take a broad strategic view of this complex phenomenon". The requirement of 5 pitches per district in the interim draft policy appears to be an attempt to apportion the overall requirement evenly. There is no information in the supporting text to explain the rationale for distribution of transit pitches in this particular manner.

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Lancashire County Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Lancashire County Council	-

## Lancashire Leaders Group

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Lancashire Leaders Group		"Appendix 1: Responses of Individual Lancashire Local Authorities Introduction Set out below are the individual responses of the following local authorities in Lancashire: Central Lancashire (Preston, South Ribble and Chorley) Hyndburn Borough Council Lancashire County Council Pendle Borough Council Ribble Valley Borough Council West Lancashire District Council Wyre Borough Council Central Lancashire

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Lancashire Leaders Group		<p>"Lancashire Sub Regional Gypsy and Traveller Accommodation and related Services Assessment 2007</p> <p>2 A GTAA identifies future needs, the Regional Spatial Strategy translates this into figures per local planning authority and local authorities identify sites to meet this need in development plan documents prepared through the local development framework.</p> <p>3 A series of GTAAs, including one for Lancashire were commissioned in 2007 by the North West Regional Assembly. These were carried out by Salford Housing and Urban Studies Unit, part of Salford University.</p> <p>4 The findings of the GTAA were reported to the Lancashire Leaders and Chief Executive's meeting in April 2007 prior to the final report being produced in May 2007.</p> <p>5 Existing Pitch Provision- Preston has an official Gypsy and Traveller site at Leighton Street. This is owned by Lancashire County Council but managed on their behalf by PCC Estates. The site has 12 pitches and could possibly be extended to accommodate a further 5 pitches. 6The Leighton Street site is occupied entirely by one ethnic group – Irish Travellers. This is a fairly settled group and proposals in the GTAA recognised that the primary need was to meet the future accommodation requirements of this group.</p> <p>7 Survey work carried out for the GTAA indicated that there were 3 pitches in unauthorised developments across Preston. The occupants of these require authorised residential development.</p> <p>8 Neither South Ribble Council nor Chorley Council has an existing official Gypsy and Travellers site within their local authority boundary GTAA Recommendations (May 2007)</p> <p>9 The GTAA recommended for Preston that, in addition to the 12 pitches on site at Leighton Street there should be a further 18 – 21 pitches provided by 2016. The rationale behind this was:</p> <p style="text-align: right;">Pitches</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>Unauthorised Development:</p> <p>3 Concealed Households:</p> <p>4 New household formation*:  currently in bricks and mortar**:  18.05 – 20.65</p> <p>10.1 – 10.5 Households  0.95 – 3.15 Total</p> <p>*This is identified as 6 up to 2011 and then a multiplier is applied for the period 2011 -2016 giving a range of 4.1 – 4.5. **This is based on a percentage estimate based on findings that between 19% and 63% of the G &amp; T population currently in bricks and mortar accommodation (mainly Ribblesdale) are likely to move back into caravan accommodation.</p> <p>10 The GTTA indicated that no pitches were needed in South Ribble or Chorley for Gypsies and Travellers.</p> <p>11 The basis of the nil requirement for Chorley and South Ribble in the Lancashire Gypsy and Traveller Accommodation Assessment is that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. In other words there was no evidence that pitches were needed.</p> <p>12 South Ribble’s records show they had one brief visit by travellers in early 2007 who were in transit to another destination.</p> <p>13 Chorley Council’s records show that since 2007 there have only been 1 or 2 brief visits by travellers who were in transit to another destination.</p> <p>14 Overcrowding- It is also noted in May 2007 that CLG published “Local authorities and Gypsies and Travellers: a guide to responsibilities and powers”. At paragraph 20 it identifies in February 2005 that CLG issued interim guidance on how to conduct accommodation needs assessments, which set out some key principles to be followed. In paragraph 22 it outlines the key principles needed to underpin any good quality accommodation assessment. These include that accommodation assessments need to look at both the current shortfall in accommodation as well as projections of future growth. The guide states, “there are real issues about overcrowding and suppressed household formation in the Gypsy and Traveller communities, just as with the settled community. The assessment should capture this”.</p> <p>15 It is obvious overcrowding has been an issue for some time and that this information could have been gathered when the accommodation needs assessment was being undertaken or prior to the further consultation that took place in June 2008</p>

**Organisation:**

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

and/or prior to the additional consultation with Gypsies and Travellers in November 2008. 4NW Consultation Allocation (January 2009)

16 The table below gives a comparison of the GTAA and 4NW pitch provisions allocations in Lancashire. Local Authority Current authorised provision Additional GTAA proposed to 2016 Additional 4NW permanent proposed to 2016 Additional 4NW transit proposed to 2016 Total 4NW additional proposed

	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches
Darwen	48	69-83	60	5	65	Blackpool	51	24	10	5	15
Burnley	0	6-7	20	5	25	Chorley	0	0	10	5	15
	0	1.0	10	5	15	Hyndburn	86	30-33	45	5	50
Lancaster	142	29-30	45	5	50	Pendle	0	2	15	5	20
Preston	12	18-21	45	5	50	Ribble Valley	0	6	10	5	15
Rossendale	0	0	10	5	15	South Ribble	0	0	10	5	15
West Lancs.	0	17	20	5	25	Wyre	0	0	10	5	15
	339	202 - 224	320	70	390						

17 The 4NW consultation report proposes an additional 45 permanent residential pitches in Preston by 2016 giving, with the existing provision at Leighton Street, a permanent provision of 57 pitches. In addition to that 4NW propose an additional 5 transit pitches.

18 The 4NW consultation report proposes a new provision of 10 permanent residential pitches and 5 transit residential pitches for both South Ribble and Chorley Councils to 2016.

19 In addition beyond 2016 to 2021 provision should be made across the region for an annual 3% compound increase in the level of overall residential pitch provision. This would mean that Preston would need to provide an additional 54 permanent residential pitches and 6 transit residential pitches up to the period 2021, South Ribble and Chorley Councils will need to identify 12 permanent residential pitches and 6 transit residential pitches to the period 2021. These pitch provision figures are not a maximum provision as best practice suggests that the pitch provision figure should be rounded up in 5's. This also allows for fool proofing for the future.

20 The Central Lancashire authorities consider information on the collection of the evidence base is not up to date as the GTTA is only robust enough to go to 2016. What evidence is there that the annual 3% compound increase beyond 2016 is the annual

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>growth rate that should be applied?</p> <p>21 It is considered there are a disproportionate number of pitches proposed in Lancashire compared to Merseyside and Greater Manchester, where it is understood the greatest need/demand lies.</p> <p>22 The only authorities to benefit from the 4NW proposal compared with the GTAA figures are Blackburn with Darwen and Blackpool. It is unclear why this is the case?</p> <p>23 The overall additional provision proposed by 4NW, including transit pitches, represents an increase above the range proposed in the GTAA of between 74% and 93% depending on whether the higher or lower range figures from the GTAA are used. It is difficult to understand the methodology or on what basis this has resulted in this overall increase. Where is the justification for an increase of this magnitude? The Central Lancashire authorities do not accept that an increase from 200 pitches (GTAA figure to 2016) in Lancashire to nearly 400 pitches (4NW figure to 2016) has resulted because of undercounting and overcrowding/doubling up on existing sites. There does not seem to be any hard evidence on these issues.</p> <p>24 The permanent residential requirements of 12 pitches (compound by 3%) for South Ribble and Chorley Councils are the lowest pitch requirements (6 authorities have this requirement) within Lancashire but there is no comparison to the nil local requirements established in the GTAA. The transit pitch requirement is the same as the rest of Lancashire – 5 pitches for every local authority, and within the Lancashire - wide requirement established by the GTAA."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Lancashire Leaders Group	<p>"Technical Note on how the Interim Draft Policy Figures were derived (February 2009)</p> <p>25 The 4NW technical note confirms the GTAA study recommended that the identified needs did not necessarily mean they should be met in specific localities and that decisions about where need should be met should be taken on a strategic basis through partnership working between regional and sub regional/local</p>

Organisation:	5. Do you have any comments to make about the supporting text?
	<p>organisations. This included the consultation stages on the 3 options undertaken in June 2008 and clear support for option 3 working with sub-regional partnerships and the Gypsy and Traveller Community to agree a more balanced share of meeting need across districts, reflecting a wider range of factors other than solely the "need where it arises" basis.</p> <p>26 This work with sub regional partnerships and the Gypsy and Traveller Community has seen pitch provision distributed to meet the requirements for Gypsies and Travellers so that they have the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community and thus contribute towards community cohesion and sustainable communities.</p> <p>27 The Technical Note indicates that using the evidence base and feedback from the consultations 4NW officers then made a professional policy judgement to come up with an initial set of pitch provision. The technical note states "this is not based on a precise mathematical formula". The Central Lancashire authorities question this "professional judgement".</p> <p>28 Following online consultation on a set of pitch provision (Nov/Dec 2008), 4NW issued a further revised provision as set out in Policy L6, Table 7.2. The level of provision now reflects the needs of those currently resident in the North West on pitches/sites without planning permission, anticipated natural growth and net movements between pitches and other forms of accommodation. This also addresses "hidden " overcrowding on existing sites and concealed Gypsy and Traveller households who currently reside on other caravan sites and holiday parks who remain undetected in GATT's. The Technical Note indicates "Once again, it should be noted that the Interim Draft figures are not based on a precise mathematics formula".</p> <p>29 The Central Lancashire authorities again question this "professional judgement" as there is no audit trail where these figures have come from. How does the more equitable distribution of pitches reflect where Gypsies and Travellers want to live? As there is not enough evidence and concise information, 4NW surely cannot make a sound judgement.</p> <p>30 Why is it that the comprehensive GTAA missed the overcrowding issues on existing sites? Why was overcrowding and hidden issues not considered earlier and examined before the main consultation stages arose?</p> <p>31 It is still considered the Technical Note does not present enough detail/evidence as to why 4NW's extended the figures from those in the GTAA to the ones in the current RSS partial review consultation. It is questionable whether "professional judgement" is enough. The increase is apparently as a result of the closed consultation exercise that was held in November 2008. The results of that consultation presented on 4NW website show in fact that most of the comments posted either reject the figures being put forward by 4NW, or if they do accept them do so on the basis that they reflect the GTAA figures. There needs to be transparency in how the 4NW figures have been reached. There needs to be clarity on what is the actual level of existing provision and why there is such a discrepancy between the papers issued in August 08 and January 09?"</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Lancashire Leaders Group	<p>"Ethnic Groupings</p> <p>35 The Gypsy &amp; Traveller population in Preston is made up of Irish Travellers and the GTAA in making its recommendations focused on the future accommodation needs of this ethnic group. There is no indication that those needs have more than doubled since the GTAA was produced. Turnover</p> <p>36 Neither the GTAA, nor the 4NW figures appear to take into account turnover of existing pitches. While these may be relatively settled populations with little movement the issue of turnover should be addressed to ensure that the proposed pitch allocations are not in fact an over-provision.</p> <p>Definition of a transit pitch</p> <p>37 More detail is required on what would be classed as meeting the requirements for transit pitch provision? The draft Partial Review RSS policy proposes that in addition to permanent pitch provision, each of the Lancashire authorities provides 5 transit pitches. These are described as potentially including:</p> <p>38 Larger pitches on residential sites provide the potential to meet the needs of short term visitors. Formal transit sites. Less-equipped 'tolerated' stopping places used on a regular basis. Temporary sites with temporary facilities available during an event, family gathering or for part of the year. Central Lancashire Authorities Requirements</p> <p>39 The Central Lancashire Authorities of Preston City, South Ribble and Chorley Councils do not accept the interim draft pitch provision figures and consider interim Draft Policy L6 and Table 7.2 should be simplified to identify exactly what pitch provision figures 4NW require to the period 2021.</p> <p>40 In the absence of any other evidence, consistency and clarity the Central Lancashire authorities continue to support the GTAA recommendations."</p>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Lancashire Leaders Group	<p>"Other Issues</p> <p>32 How do we know the extent of Gypsy and Traveller households living on other kinds of sites?</p> <p>33 Why is it necessary to seek to house all Gypsy and Traveller households on dedicated sites rather than allowing continued use of other sites (subject to the general restrictions on the use of holiday homes)?</p> <p>34 Why is it imperative that we meet all possible housing requirements when for the settled community there is a large gap between housing needs and what can be delivered?"</p>

## Lancaster City Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Lancaster City Council	Yes	

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Lancaster City Council	No	<p>Lancaster City Council welcomes this early opportunity to comment on the partial review of RSS. Lancaster District has a strong historical association with the travelling community and the City Council has always adopted a responsible and proactive approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople. Lancaster District has the highest level of provision in the region, including one successful local authority operated site. With this in mind, the City Council accepts that in a large part at least, future requirements will be strongly influenced by existing provision. Given the relatively self-contained nature of the District, this inevitably means that Lancaster district will be an area where gypsies and travellers will want to reside. However, the Council also believes that it cannot be automatically assumed that the reason that Gypsy and Travellers have not historically resided in some Districts is because they have no affinity with an area. Communities do not recognise administrative boundaries and some Councils take an less than positive approach to Gypsy's and Travellers. The City Council considers that the policy should be to encourage all communities to be welcoming of Gypsies and Travellers rather than allow No Go areas to be maintained.</p> <p>In terms of the emerging future provision figures, the City Council understands and accepts the findings of the Gypsy and Traveller Assessments but does not at the moment have the evidence to allow it to understand how 4NW has translated these into the current provision figures. With the information currently available to it, the Council believes the suggested provision in the GTAA of permanent pitches more accurately reflects the need in this district. We require a detailed and satisfactory explanation of how these have been arrived at and must lodge a "holding" objection until this has been received. The City Council also requires clarification on what level of financial assistance will be made available to authorities to help meet its requirements for costs such as site infrastructure (roads, drainage etc), education, welfare etc. In addition, can 4NW clarify if financial assistance will be available to cover the difference in</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		costs/values associated with gypsy site provision to encourage landowners to release sites? In terms of Travelling Showpeople, the Council is broadly happy with the suggested future provision at this stage.  The City Council also considers that more thought should be given to the implications of providing stopover/transit sites as these will be relatively expensive to provide and, due to intermittent use, will require robust management to prevent them becoming semi-permanent.

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Lancaster City Council	

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Lancaster City Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
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<b>Organisation:</b>	<b>7. Any other comments?</b>
Lancaster City Council	-

## Liverpool City Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Liverpool City Council Planning Service		<p>Gypsy &amp; Traveller Provision Comments The comments made below have been prepared at Planning Officer level at Liverpool City Council.</p> <p>(Note as no provision requirements are proposed for Travelling Showpeople in Liverpool, the comments made are confined to Gypsy &amp; Traveller Provision). Scale of provision has not been derived from the evidence base.</p> <p>1. The level of provision recommended in the Merseyside Gypsy &amp; Traveller Accommodation Assessment (G&amp;TAA) is derived from evidence undertaken to the latest (February 2006) government guidance, however, the increase in provision in the Interim Draft Policy is not grounded in the evidence base.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>						
Liverpool City Council Planning Service		<p>Provision for 2016-2021</p> <p>5. The Interim Draft Policy sets out a mechanism for provision for the period 2016-2021 based on annual compound increase. Three comments are made in relation to this mechanism.</p> <p>6. Mathematical Nature. The Technical Note emphasises that the increased provision for the 2007-2016 period "... is not based on a precise mathematical formula" (sic). However, for the period 2016 to 2021 the provision is based on a precise mathematical formula. The two approaches are in stark contrast. Thus, why is it necessary to have a mathematical formula to determine the provision for the later period, when for the earlier period the emphasis is on judgement?</p> <p>7. Simpler presentation of the provision figures. In order to calculate the annual compound increase, the wording of the draft policy is interpreted as taking the total provision as at 2016 as the base figure, which is subject to a 3% annual compound increase for the period 2016 to 2021. For Liverpool the calculation would result in following table</p> <table border="1" data-bbox="739 973 1747 1069"> <thead> <tr> <th>Current Provision</th> <th>2007-2016 Provision (@ Interim Draft Policy)</th> </tr> </thead> <tbody> <tr> <td>2016 Total Provision (Base figure)</td> <td>2016-2021 Provision (@ 3% annual compound increase)</td> </tr> <tr> <td>2021 Total Provision</td> <td>14 25 39 5.99 44.99</td> </tr> </tbody> </table> <p>This provides greater clarity and in terms of simplification, the provision could be made to the (higher) whole number i.e. 45 pitches. If the interpretation of the draft policy wording, and thus the calculation, is wrong, further clarification is required as there are a number of methods to calculate compound increase.</p> <p>8. Whilst the underlying logical of applying a % annual compound increase to all local authorities is to ensure they all add up to the regional total (351 additional pitches), the effect at the local authority level of compound increase on low values and over short periods of time is miniscule. Using the provision figure set for 2016 for Liverpool as the base figure (39 pitches), the 3% annual compound increase results in additional 5.99 pitches by 2021. However, if the calculation is a flat 3% annual increase over five years, the result is 5.85 pitches. Perpetuating Unbalanced Spatial</p>	Current Provision	2007-2016 Provision (@ Interim Draft Policy)	2016 Total Provision (Base figure)	2016-2021 Provision (@ 3% annual compound increase)	2021 Total Provision	14 25 39 5.99 44.99
Current Provision	2007-2016 Provision (@ Interim Draft Policy)							
2016 Total Provision (Base figure)	2016-2021 Provision (@ 3% annual compound increase)							
2021 Total Provision	14 25 39 5.99 44.99							

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>Distribution</p> <p>9. Whilst there is a general increase affecting all authorities, and for the Merseyside sub-region the proportions are broadly similar as shown in the Appendix to the Technical Note, the Interim Draft Policy does not address the problem of perpetuating the affect of need arising in certain locations stemming from the unbalanced pattern of the existing distribution, consequently, limiting the choice of location. Transit Sites Provision</p> <p>10. The Merseyside G&amp;TAA indicated a total of 10 transit pitches for the sub-region but did not allocate any to the four local authorities. However, the Interim Draft Policy proposes a provision of 20 transit pitches distributed equally amongst the four local authorities, reinforcing the earlier point regarding the arbitrary nature of how the figures have been arrived at.</p> <p>11. Also, such a distribution may not meet the needs of groups whilst travelling and may not prevent unauthorised encampment. Thus, local authorities could provide a transit provision but still need to take action against unauthorised occupation, whilst adjacent local authorities may have unused authorised transit provision.</p> <p>12. Although the transit provision is phrased as a minimum, as local authorities (or another party) would incur management and maintenance costs to be reimbursed by the fees earned due to occupation, ensuring there is a balance between supply and demand and maximising occupation throughout the year, are likely to be more critical factors in influencing the level of provision.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Liverpool City Council Planning Service	<p>2. The Technical Note published by 4NW in February 2009 explains the evolution of the policy, particularly the targeted consultation and additional input taken into consideration, alongside the evidence base (i.e. G&amp;TAA). This additional work consequently informed professional policy judgement. The Appendix to the Technical Note compares the spatial distribution of the provision as set out in the G&amp;TAA with the Interim Draft Policy, which is broadly similar for the four Merseyside local authorities. However, further clarification is required</p>

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
	<p>to underpin the increase in provision for the Merseyside sub-region, from the G&amp;TAA assessment (45 no. pitches) to the 75 (minimum) additional pitches contained in the Interim Draft Policy, for 2007-2016.</p> <p>3. Though the rationale for the increase has been partially explained (i.e. to meet 'hidden demand'), the numbers appear to be arbitrarily determined.</p> <p>4. Further, a concern arising from the above, the proposed provision divorced from the evidence, is the provision figures can be arbitrarily changed again in response to ongoing consultation, with consequential impacts on individual local authorities.</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Liverpool City Council Planning Service	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Liverpool City Council Planning Service	<p>Location and Design Criteria</p> <p>13. The Interim Draft Policy includes criteria to be considered as regards the location and design of facilities. Given that in due course the Partial Review will be incorporated into a local authority's Development Plan, consisting of both RSS and Local Development Framework, the relationship with the LDF requires clarification. For instance, will the criteria for consideration form policy, to be used directly to guide a Land Allocations Development Plan Document and possibly be a material considering a planning application?</p>

## Macclesfield Borough Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Macclesfield Borough Council	No	The evidence of need for additional pitches was initially based on the regional and sub-regional Gypsy and Traveller Accommodation Assessments (GTAAs) but an allowance has been added to address issues raised by the Gypsy and Traveller community. These issues included 'hidden' overcrowding on existing sites and concealed households who reside on other caravan sites and holiday parks. Additionally policy L6 seeks to broaden the choice for Gypsy and Travellers and not base provision solely on the 'need where it arises' basis that is claimed to be used by GTAAs. Whilst the explanation of how the figures have been developed is noted, it is not considered that sufficient evidence or justification has been provided to enable a full assessment of the pitch figures proposed.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Macclesfield Borough Council	No	See previous answer

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Macclesfield Borough Council	-

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Macclesfield Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Macclesfield Borough Council	-

## Wyre Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Management Board, Wyre Borough Council		<ol style="list-style-type: none"> <li>1. Purpose of Report               <ol style="list-style-type: none"> <li>1.1 To consider all matters relating to the formulation of the Interim Draft Policies for Gypsies and Travellers and Travelling Showpeople and approve a response to be sent to the regional planning body 4NW</li> </ol> </li> <li>2. Outcomes               <ol style="list-style-type: none"> <li>2.1 To approve a response to the Partial Review of the Regional Spatial Strategy</li> </ol> </li> </ol>

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
		<p>Public Consultation on Interim Draft Policies for Gypsies and Travellers and Travelling Showpeople.</p> <p>3. Recommendation</p> <p>3.1 Having regard to all the issues set out in the report below and the lack of time to be able to present an item to Cabinet for their consideration and approval, it is recommended that a response be sent on the consultation exercise to 4NW stating that;</p> <p>3.2 “The Council has considered Interim Draft Policy L6 - Scale and Distribution of Gypsy and Travellers Pitch Provision and L7 – Scale and Distribution of Travelling Showpeople Plot Provision. Consideration has also been given to matters arising from the 2 workshops and the additional technical information presented to them during the course of the consultation period.</p> <p>3.3 The Council accepts that there is a need to have a good understanding of different Gypsy and Traveller and Travelling Showpeople communities to be able to accommodate them satisfactorily. However there is still concern about the high level of pitch/plot provision in the Wyre area but in recognition of the complex issues involved the Council will make a full representation at the next formal stage of the consultation process. At this time it is expected that there will have been more opportunity to discuss the current figures with the other Fylde Coast Authorities and Members to try to ascertain the implications for future Development Plan policy formulation and development control decisions.”</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Management Board, Wyre Borough Council		<p>"4. Background</p> <p>4.1 Following the receipt of consultation responses 4NW will revise and publish the policies as appropriate for a further round of public consultation in the summer of 2009. This will be the final version of the draft policies which will be the basis for the formal submission of Draft RSS Policies to the Secretary of State and an Examination in Public will take place in due course. It should be noted that this current stage of consultation is only informal and that there will be opportunity for the Council to make full and formal representations later in the year.</p> <p>4.2 The context for policies on Gypsies and Travellers and Travelling Showpeople is the key Government objective of providing decent homes for all. The Government's key policy objectives in relation to all these groups of people are to ensure that sufficient, suitable provision is made throughout the region to meet the needs of these groups through the inclusion of appropriate policies in Development Plan Documents. The RSS should identify the number of pitches required for each Local Planning Authority and these pitch numbers should be translated at a later date into site specific allocations in Development Plan Documents. It is therefore important to analyse and respond to the draft policies presented.</p> <p>4.3 The issue of pitch provision for Gypsies, Travellers and Travelling Showpeople is difficult and contentious. It is apparent that there is a degree of consensus over the need for increased provision in the region, the contention lies in regard to the location and number of pitches. The proposed number of pitches each Local Authority is required to provide has changed considerably over the last 2 years. There are concerns generally about the robustness of the research into current provision and future need and some authorities believe that there should be closer alignment between the pitch provision figures listed in this current Interim Policy and the Gypsy and Traveller Accommodation Assessments (GTAA) undertaken throughout the region in 2007/2008.</p> <p>4.4 The starting point for assessing need is the preparation of an evidence base namely a Gypsy and Traveller Accommodation Assessment. In the Lancashire sub region this assessment was undertaken by an experienced study team from the Universities of Salford and Birmingham in 2007 aided by a plethora of national legislation and guidance. The study concluded that for Wyre there was a requirement for 0 permanent pitches and 3 Travelling Showpeople pitches whereas for the 3 Fylde Coast Authorities collectively there was a requirement for 25 permanent pitches and 3</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>Travelling Showpeople pitches .</p> <p>4.5 However following consultation feedback in June 2008 and November 2008 4NW have published a new set of pitch provision figures having taken a different strategic view of the GTAA supported by additional evidence collected recently. 4NW have taken into consideration further feedback from both planning and housing officers and members of the Gypsy, Travellers and Travelling Showpeople communities. They have also taken note of recently published recommendations from the examination in public Panel reports into the RSS partial reviews in the South West and East of England covering Gypsies and Travellers and Travelling Showpeople.</p> <p>5. Key Issues</p> <p>5.1 The result of all this evidence gathering is that the proposed allocation of pitches in the Interim Draft Policy has increased greatly for Wyre to 10 permanent residential pitches, 10 Travelling Showpeople pitches and 5 transit pitches. For the three Fylde Coast Authorities collectively the requirement is currently proposed at 30 permanent Gypsy and Traveller pitches, 30 Travelling Showpeople pitches and an additional 15 transit pitches. In total this amounts to 75 pitches, an increase of nearly 150% for the Fylde Coast from the original GTAA study. ( Note: figures have been provided for the three Fylde Coast Authorities because the draft RSS policy suggests that once allocations have been made there is an opportunity for authorities to work together on a combined policy that would allow allocations to be combined and provision made wherever suitable opportunities arise across all three LA's. This will be a matter for future debate to come to a decision whether this approach to provision would be seen as desirable by each Fylde Coast Authority.)</p> <p>5.2 In addition to this the draft policy recommends an annual 3% compound increase in the overall residential pitch provision beyond 2016 although it is recommended that a coordinated review of the Sub Regional GTAA's should be undertaken in 2013 in anticipation of the end of the plan period. This level of growth was accepted by the Panel reviewing the East of England RSS and is probably acceptable for this area until the GTAA review is completed.</p> <p>5.3 At present Wyre together with many other local authorities in Lancashire and the region has concerns about the robustness of the figures in the Interim Draft Policies and how the alterations to the numbers can be justified. 4NW have tried to address these concerns by circulating additional technical notes and organising 2 workshops for members, officers and all sectors of the Gypsy and Travellers community to open up</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>discussions and try to get agreement, at officer level, on pitch numbers for the sub region and districts. Both of these workshops have now been held, they have both been informative, but there has been no agreement on pitch numbers at this stage in the process. Essentially many authorities still have concerns about the lack of transparency into how the latest figures have been arrived at.</p> <p>5.4 It is acknowledged that justifying figures is a difficult process particularly in relation to the Gypsy, Traveller and Travelling Showpeople sectors of the community as historically there are no comprehensive counts of the population or the sites they occupy.</p> <p>5.5 4NW have indicated that the methodology used in the sub regional GTAA to assess potential pitch and plot requirements was inadequate in certain areas. Requirements in the GTAA were based on a " need where needs arise" approach which reflects the current uneven distribution of provision throughout the area and therefore it does not take account of geographical preference particularly from concealed households. Regional planners have also stated that further allowances need to be made to address the issue of hidden overcrowding on existing sites and concealed households on other caravan parks and holiday parks who remain undetected in GTAA's because Gypsies and Travellers who live on such sites are not willing to be counted in surveys in case they lose their existing pitch, even if it is inadequate in some form.</p> <p>5.6 In light of the feedback from further consultation exercises to try to bridge the perceived gaps in the GTAA evidence base, officers from 4NW have stated that there may be 70 % more need than picked up in the GTAA's. They have had to use their professional judgment to revise the figures although they emphasise that the figures are not based on a precise mathematical formula.</p> <p>5.7 Therefore in the Interim Draft Policies the pitch provision figures have increased and been spread more widely over the region. 4NW have also substantiated the changes by stating that there is a principle each local authority should provide something and that the required provision should be no less than 10 pitches because good practice guidance suggests this is the minimum figure to be able to provide good facilities. In the Wyre area the current Interim Draft Policy requirement proposed is 10 permanent Gypsy and Traveller pitches, 10 Travelling Showpeople plots and 5 transit pitches.</p> <p>5.8 There are concerns about the latest draft pitch provision figures which could be said to be based on preference rather than need. It is clear from the Panel Report into</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		the RSS Partial Review in the East of England that the robustness of the evidence base was a particular test of soundness. Therefore it is imperative to establish if the GTAA evidence base and/or the additional analysis done by 4NW is robust ."

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Management Board, Wyre Borough Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Management Board, Wyre Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Management Board, Wyre Borough Council	"5.9 In summary the key issue is the robustness of the Lancashire Sub – Regional Gypsy and Traveller Accommodation and Related Services Assessment 2007 and the additional research done by 4NW. The council has a responsibility to assess accommodation needs for Gypsy communities and feedback on the scale and

<b>Organisation:</b>	<b>7. Any other comments?</b>
	distribution of pitch provision is important. Although this is an informal consultation, at the next stage in the process the figures in the Interim Policies will become a material consideration when determining planning applications and they will also be used to formulate local policies and site allocations through the Local Development Plan process. This has already been an issue in the Wyre area with the current appeal at Kepple Lane , Garstang for a site for Travelling Showpeople."

## MBW Developments Planning Consultants

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
MBW Developments Planning Consultants		-

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
MBW Developments Planning Consultants		-

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
MBW Developments Planning Consultants	-

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
MBW Developments Planning Consultants	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
MBW Developments Planning Consultants	-

## Northwest Regional Development Agency

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Northwest Regional Development Agency		Whilst the agency welcomes the opportunity to respond, our comments on the draft policy are brief and generally supportive. The general thrust of the interim draft policies for Gypsies and Travellers reflects the requirements of DCLG Circulars 01/2006 and 04/2007 which deal with Planning for Gypsy and Traveller Caravan sites.

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Northwest Regional Development Agency		<p>We have no wish to comment on the overall scale of provision or figures for individual local authorities, which are based on evidence from the various regional and sub regional Gypsy and Traveller Accommodation Assessments (GTAAs) undertaken in 2007 and 2008. However, on a point of detail, we note that the figures for the Cumbria sub-region in Tables 7.2 and 7.3 exclude the Lake District National Park. Further clarification is required as to whether the figures for Allerdale, Copeland, Eden and South Lakeland relate to the areas outside the National Park. We suggest that the position with regard to the National Park is made explicitly clear (for example, by including a zero requirement within the tables if this is the case).</p> <p>We do however, wish to express our support for the underlying approach which seeks to address the current uneven distribution of pitches for Gypsies and Travellers. By increasing provision in areas where choices are currently constrained by a lack of facilities, and by widening the geographic distribution to increase provision in areas beyond those where the highest levels of need are evident, these policies will help to widen the opportunities available to these communities.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Northwest Regional Development Agency	<p>We note the remark in the supporting text that the distributions of additional pitches, nevertheless, remain concentrated to a significant degree in the areas where Gypsies and Travellers currently reside. Whilst this is not a direct concern of the NWDA, we would encourage 4NW and the local authorities to reach a wide consensus that is seen as fair and equitable by all concerned. We welcome and support references in the supporting text which helpfully set out the position in respect of:</p> <p>(a) sites for Gypsies and Travellers in the Green Belt having regard to national planning policy in PPG 2</p> <p>(b) Factors being taken into consideration when assessing the suitability and design of sites.</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Northwest Regional Development Agency	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Northwest Regional Development Agency	-

## Liverpool and Sefton Councils

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
On behalf of Liverpool and Sefton Councils	No	Because of the pitch distribution figures

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
On behalf of Liverpool and Sefton Councils	No	<p>Please note: delegated authority as been granted to Sefton officers to make an official response on behalf of Sefton Council. For Liverpool these constitute officer level comments only which augment but do not supersede any separate comments they have prepared for their authority. Knowsley and Wirral are unable to share in making officer level comments, however they have both expressed concern at the way the partial review figures have been derived in their own separate responses. Knowsley, Liverpool, Sefton and Wirral are the authorities covered by the Merseyside Gypsy &amp; Traveller Accommodation Assessment (MG&amp;TAA). Whilst Liverpool and Sefton generally support the draft Gypsy &amp; Traveller policy, they do not support the number of permanent residential and transit Gypsy &amp; Traveller pitches allocated to Merseyside. The figures are different to the recommendations of the M&amp;GTAA without a clear and adequate justification.</p> <p>Liverpool and Sefton feel that the Merseyside G&amp;TAA is the best available estimate of need in the study area. We have not been made aware of any serious deficiencies of</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>the methodology of the MG&amp;TAA, which was conducted by Salford Housing and Urban Studies Unit (SHUSU). In partnership with the University of Birmingham Centre For Urban and Regional Studies (CURS), SHUSU also prepared the North West Regional GTAA and wrote the NW G&amp;TAA: A Good Practice Guide (May 2007), as published on the 4NW technical website. In an e-mail of the 20th January 2009 to participants in the consultation on the Partial Review of RSS, 4NW refers to paragraph 4 of the supporting text of the "Interim Draft Policy L6 - Scale and Distribution of Gypsy &amp; Traveller Pitch Provision": "In addition [to the evidence from the G&amp;TAAs] an allowance has been made to address the issue raised by the Gypsy and Traveller community of "hidden" overcrowding on existing sites and concealed Gypsy &amp; traveller households who currently reside in other caravan sites and holiday parks, who for various cultural and management reasons remain undetected in G&amp;TAAs."</p> <p>The exact nature of the comments by the Gypsy &amp; Traveller community mentioned in paragraph four has not been disclosed. In the "4NW – Consultation Forum on draft Gypsy and Travellers and Travelling Showpeople policies" report published by CAG in January 2009 and then revised in February 2009, there are no comments about the figures for the MG&amp;TAA study area being inaccurate. The notes from two meetings, with Travelling Showpeople on the 9th December 2008 and (presumably) Gypsies &amp; Travellers on the 19th December 2008 have been removed, making it unclear what exactly was said regarding the G&amp;TAA site provision figures.</p> <p>4NW published a "Technical Note on how the Interim Draft Policy Figures for Gypsies and Travellers, and travelling Showpeople (North West Regional Spatial Strategy Partial Review) were derived" in February 2009. This explains that the Gypsy &amp; Traveller figures were adjusted following the Gypsy &amp; traveller workshop in December 2008 by adding 70% to the existing provision, and then modified again (in an unspecified way) following the receipt of feedback during the November / December 2008 consultation. There is no detailed justification for exact figure (70%) initially added, nor for the subsequent modification.</p> <p>There is also no detail of how any re-distribution within or between sub-regions has been calculated.</p> <p>In contrast to the above, the MG&amp;TAA (as did other G&amp;TAAs) followed the NW G&amp;TAA Good Practice Guidance. On Merseyside, SHUSU interviewed 21 households on Social Rented sites (70% of the total on sites), 2 on unauthorised encampments and 49 in bricks and mortar housing (70% of the total identified). The calculation of need allows</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>for the growth of the estimated total number of households and takes account of concealed households. Therefore the Liverpool, Sefton and Wirral do not accept that the MG&amp;TAA did not adequately identify the need arising from "hidden" overcrowding on existing sites and concealed households.</p> <p>The MG&amp;TAA found that only 10 transit pitches were required in the whole of Merseyside, as opposed to the 20 suggested by the draft policy L6. Furthermore, it found that no further transit provision was required beyond 2012 as "the level of travelling will not increase in the foreseeable future and other surrounding local authorities will also have developed transit options" (p10, Merseyside GTAA). No evidence has been presented to suggest an alternative requirement.</p> <p>Liverpool and Sefton note the 4NW comment that it is not possible to have a precise "mathematic formula" and that some degree of professional officer judgement is necessary when trying to translate the recommendations of the GTAAs into RSS policy and pitch requirements for individual districts. However, a clear explanation of the factors that 4NW have taken into account and the weighting given to each factor when amending the GTAA recommendations is necessary for Councils to understand the process and give constructive feedback. These factors may include taking account of methodological problems (if any) with a GTAA and redistribution of provision within and between sub-regions. We also note that professional advice on how best to collect together and adjust the findings of the several GTAAs does not seem to have been sought from the authors of the GTAAs.</p> <p>It is clear that neither 4NW or any other organisation has produced a robust alternative to the site provision figures in the MG&amp;TAA. The Liverpool and Sefton will of course consider any evidence provided to them that the MG&amp;TAA estimate of need is wrong and take action accordingly, but in their opinion this has not occurred so far.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
On behalf of Liverpool	No

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
and Sefton Councils	

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
On behalf of Liverpool and Sefton Councils	No

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
On behalf of Liverpool and Sefton Councils	No

## Pendle Borough Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Pendle Borough Council	No	<p>Pendle Borough Council welcomes the opportunity to comment on the draft allocations for gypsy and traveller sites. In overall terms the Council objects to the figures and spatial distribution as proposed in the consultation. The reasons for this objection are as set out below.</p> <p>Overarching national policy on housing provision is set out in Planning Policy Statement 3 (PPS3). PPS3 deals with general housing needs as well as those for specific groups within society. Pendle fully endorses the emphasis of this which seeks to provide a decent home for everyone in a way that is the most sustainable. Paragraph 21 emphasises that RSSs should set out the approach to achieving a good housing mix including the need to accommodate Gypsies and Travellers.</p> <p>The PPS emphasises that it is the needs of Gypsies and Travellers that should be considered. It does not place any emphasis or requirement to provide for a wider provision for pitches that is not an inherent need. This is a fundamental point as the spatial distributions and level of provision proposed goes beyond what the identified needs are. It also artificially distributes pitches in locations where they are not needed. This will be addressed in more detail below.</p> <p>Circular advice on provision is contained in Circular 01/2006 – Planning for Gypsy and Traveller Caravan Sites. Paragraph 14 emphasises the requirement to meet the needs of Gypsies and Travellers and recognises that the accommodation need is not always in caravans and that need can be met in permanent housing.</p> <p>Paragraph 18 emphasises that sites should be found to meet the working patterns of gypsies and travellers. This is relevant in Pendle as the evidence the Council has is that there is only very limited activity in the area, with no planning applications or planning enforcements having occurred in the last 10 years.</p> <p>Circular 01/2006 gives details of how the planning process should operate in terms of setting allocations. It clearly sets out that Gypsy and Traveller Accommodation Assessments (GTAA's) should be the evidence base that informs requirements for each local authority area. A Lancashire wide assessment was published in May 2007. The needs identified in that are significantly different to the proposed provision, as is the</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>distribution.</p> <p>The emphasis on growth and where this should take place was the subject of considerable debate during the production of the RSS. The overall result of this was policy RDF1. This places a requirement for growth, in all sectors of housing and the economy, on the regional centres of Manchester and Liverpool.</p> <p>This was to reflect the purported strengths of those as areas capable of supporting growth and of the ability to develop sustainably. When however the pitch provision figures are analysed Blackburn with Darwen has a proposed new allocation almost as large as that for the whole of the Merseyside Sub-Regional Partnership. This is clearly contrary to the whole basis of RSS on spatial distribution of development.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Pendle Borough Council		<p>The Technical Note accompanying the consultation refers to Option 3 as being the preferred approach to meeting need. This seeks a more spatially equitable distribution of sites. This approach is not a needs based approach. It is an approach seeking to share the distributions out on the premise of equal access to services and facilities. There is no evidence of what services and facilities are available to meet this aim, that has been produced to substantiate the levels of provision proposed. If access to</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>services is the justification for pitch distribution there must be empirical evidence provided of where the services and facilities are and distributions allocated accordingly. However this approach would not be in line with PPS3 or Circular 01/2006 which requires provisions to be made based on need. As persons of nomadic habit of life need is predicated on working patterns and locations where gypsies and travellers seek to make a living. That is demonstrated in terms of where there is pressure for existing pitches and unauthorised sites.</p> <p>Further if access to services and facilities is the intended aim of the policy then it should be in line with Policy RDF1. It clearly is not. If an artificial distribution of pitches, not based on need, is proposed then growth should be based on the regional centres that are defined in the RSS as being those areas that growth must be based in and at the same time can accommodate that growth based on their infrastructure capacity. If option 3 is the chosen option, and the distribution is based on access to services and facilities then a full assessment needs to be made of which areas have those facilities and the figures adjusted accordingly.</p> <p>The emphasis of the LDF process is however to ensure that infrastructure meets the needs of growth for an area. The distribution of pitches should therefore be based on identified need with any infrastructure improvements brought forward as part of the delivery mechanisms for the individual DPD's.</p> <p>The preceding comments illustrate that any distribution based on anything other than a robust and credible evidence base is fraught with difficulties, can not be supported and leads to a conclusion that the major centres should provide for the majority of new pitches in line with the spatial development principles in the RSS.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Pendle Borough Council	Much of the distribution proposed is based on a policy judgment not evidence. Any judgement must be commensurate with the evidence available. In the case of Lancashire the proposed figures increase provision of sites by 68%. Such a significant increase is not one that can be supported based on judgment but must be

Organisation:	5. Do you have any comments to make about the supporting text?
	<p>backed up by well researched, comprehensive and credible evidence.</p> <p>The GTAA published in May 2007 was commissioned by the NWRRA (4NW) and supported and managed by representatives of the Lancashire Authorities. It comprised of reviews of existing data sources, questionnaires, focus groups and interviews with members of the Gypsy and Traveller Communities. It considered the overall growth of the Gypsy and Traveller Community (there is no evidence of significant growth nationally) as well as assessing concealed households and new household formation. Unreported or hidden need is one of the justifications for an increase in numbers. That has been assessed in the GTAA and no other credible evidence exists to contradict that. Pendle objects to the methodology and lack of evidence that has been employed to generate the proposed figures.</p> <p>The overall level of provision is not justified across Lancashire and it has no credible evidence base, nor does the pattern of distribution. For Pendle the proposed allocation is fundamentally flawed, is based on unjustified assumptions which are contrary to PPS3 and the RSS. If the GTAA is to be ignored there is also a fundamental question of why it was undertaken in the first place and why is national policy being set aside which states that provision must be in line with GTAAs.</p> <p>Circular 01/2006 makes it clear that allocations must be based on need as set out in GTAAs.</p> <p>The GTAA for Lancashire shows that Pendle is not a location that is used by Gypsy and Travellers and has a need for 2 pitches and not 20. The Council would support an allocation in the RSS of 2 pitches in Pendle.</p>

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Pendle Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Pendle Borough Council	-

## Pickmere Parish Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Pickmere Parish Council		-

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Pickmere Parish Council	-	-

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Pickmere Parish Council	

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Pickmere Parish Council	

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Pickmere Parish Council	

## Plumley with Toft and Bexton Parish Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Plumley with Toft and Bexton Parish Council		-

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Plumley with Toft and Bexton Parish Council	No	Accommodation for gypsies and travellers. Plumley with Toft and Bexton Parish Council would like to respond to the Draft Regional Policy to 2016.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>7.2 Scale and Distribution of Gypsy and Traveller Pitch Provision. We understand that Cheshire East already has the highest number of pitches in Cheshire (95) however is still required to have further 80. To our knowledge this is the second highest number , Lancaster being the highest. It is apparent that the distribution of actual suggested pitches is by far denser along the M6 motorway spine. This presumably is where land in most in demand by businesses and people who make a vital contribution to the Nations economy. We do not believe that there is a specific need for gypsy sites to be concentrated in this area. Your distribution of pitches needs to reflect general planning laws, availability of suitable Brownfield sites and the wishes of the general public, as well as the gypsies' needs - which are not the same as their wishes or demands. Being a member of a minority group does not confer immunity from general laws intended to safeguard society as a whole and you should not be encouraging unlawful action to the detriment of environmental rights. We consider that Cheshire East has a high percentage of Green Belt land, consequently providing less opportunity to find brownfield sites. Therefore, surely Cheshire East should be required to provide fewer gypsy sites, not more. You should not be encouraging conscious defiance of planning law relating to the presumption against development in the Green Belt. Gypsies may wish to live in Green Belt close to the motorway but it is not the same as need adn being a member of does not confer immunity from general laws intended to safeguard society in general. We request that you revise your policy completely to reflect this.</p> <p>In Cheshire minimum standards are set for carparking and housing and industry adn residential areas are generally separately zoned. Gypsies are entitled to no more, no less. As far as we are aware, there is no obligation to provide anyone with the means for two homes or to live separately. Your policies need to reflect this. Given the above, we consider that you must revise your pitch distribution policy completely and we look forward to hearing from you. Yours faithfully, Sarah Sherwood (MRS)</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Plumley with Toft and Bexton Parish Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Plumley with Toft and Bexton Parish Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Plumley with Toft and Bexton Parish Council	-

## Preston City Council

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Preston City Council	Yes	See below
Preston City Council	No	<p>Central Lancashire Authorities Response to 4NW Accommodation for Gypsies and Travellers: Interim Draft Policy L6- Scale and Distribution Accommodation of Gypsy and Travellers Pitch Provision Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L6; and accept the need to provide a certain level of additional pitches for gypsies and travellers. However the Central Lancashire authorities do object to the Gypsy and Travellers proposed pitch distribution and numbers identified for each authority. Lancashire Sub Regional Gypsy and Traveller Accommodation and related Services Assessment 2007</p> <p>2 A GTAA identifies future needs, the Regional Spatial Strategy translates this into figures per local planning authority and local authorities identify sites to meet this need in development plan documents prepared through the local development framework.</p> <p>3 A series of GTAAs, including one for Lancashire were commissioned in 2007 by the North West Regional Assembly. These were carried out by Salford Housing and Urban Studies Unit, part of Salford University.</p>

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>4 The findings of the GTAA were reported to the Lancashire Leaders and Chief Executive’s meeting in April 2007 prior to the final report being produced in May 2007.</p> <p>5 Existing Pitch Provision- Preston has an official Gypsy and Traveller site at Leighton Street. This is owned by Lancashire County Council but managed on their behalf by PCC Estates. The site has 12 pitches and could possibly be extended to accommodate a further 5 pitches.</p> <p>6 The Leighton Street site is occupied entirely by one ethnic group – Irish Travellers. This is a fairly settled group and proposals in the GTAA recognised that the primary need was to meet the future accommodation requirements of this group.</p> <p>7 Survey work carried out for the GTAA indicated that there were 3 pitches in unauthorised developments across Preston. The occupants of these require authorised residential development.</p> <p>8 Neither South Ribble Council nor Chorley Council has an existing official Gypsy and Travellers site within their local authority boundary</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
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Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
Preston City Council	Yes	<p>"Central Lancashire Authorities Response to 4NW – Preston City Council Comments Accommodation for Gypsies and Travellers: Interim Draft Policy L6- Scale and Distribution Accommodation of Gypsy and Travellers Pitch Provision</p> <p>Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L6; and accept the need to provide a certain level of additional pitches for gypsies and travellers. However the Central Lancashire authorities do object to the Gypsy and Travellers proposed pitch distribution and numbers identified for each authority. Lancashire Sub Regional Gypsy and Traveller Accommodation and related Services Assessment 2007</p> <p>2 A GTAA identifies future needs, the Regional Spatial Strategy translates this into figures per local planning authority and local authorities identify sites to meet this need in development plan documents prepared through the local development framework.</p> <p>3 A series of GTAAs, including one for Lancashire were commissioned in 2007 by the North West Regional Assembly. These were carried out by Salford Housing and Urban Studies Unit, part of Salford University.</p> <p>4 The findings of the GTAA were reported to the Lancashire Leaders and Chief Executive’s meeting in April 2007 prior to the final report being produced in May 2007.</p> <p>5 Existing Pitch Provision- Preston has an official Gypsy and Traveller site at Leighton Street. This is owned by Lancashire County Council but managed on their behalf by PCC Estates. The site has 12 pitches and could possibly be extended to accommodate a further 5 pitches. 6 The Leighton Street site is occupied entirely by one ethnic group – Irish Travellers. Th</p> <p>is is a fairly settled group and proposals in the GTAA recognised that the primary need was to meet the future accommodation requirements of this group.</p> <p>7 Survey work carried out for the GTAA indicated that there were 3 pitches in unauthorised developments across Preston. The occupants of these require authorised residential development.</p> <p>8 Neither South Ribble Council nor Chorley Council has an existing official Gypsy and Travellers site within their local authority boundary GTAA Recommendations (May 2007) 9 The GTAA recommended for Preston that, in addition to the 12 pitches on site at Leighton Street there should be a further 18 – 21 pitches provided by 2016. The</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.												
		<p>rationale behind this was:</p> <table border="0"> <tr> <td>PitchesUnauthorised Development:</td> <td>3</td> <td>Concealed Households:</td> <td>4</td> </tr> <tr> <td>New household formation*:</td> <td>10.1 – 10.5</td> <td>Households currently in bricks and mortar**:</td> <td>0.95 – 3.15</td> </tr> <tr> <td></td> <td></td> <td>Total</td> <td>18.05 – 20.65</td> </tr> </table> <p>*This is identified as 6 up to 2011 and then a multiplier is applied for the period 2011 -2016 giving a range of 4.1 – 4.5. **This is based on a percentage estimate based on findings that between 19% and 63% of the G &amp; T population currently in bricks and mortar accommodation (mainly Ribblesdale) are likely to move back into caravan accommodation.</p> <p>10 The GTTA indicated that no pitches were needed in South Ribble or Chorley for Gypsies and Travellers.</p> <p>11 The basis of the nil requirement for Chorley and South Ribble in the Lancashire Gypsy and Traveller Accommodation Assessment is that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. In other words there was no evidence that pitches were needed.</p> <p>12 South Ribble's records show they had one brief visit by travellers in early 2007 who were in transit to another destination.</p> <p>13 Chorley Council's records show that since 2007 there have only been 1 or 2 brief visits by travellers who were in transit to another destination.</p> <p>14 Overcrowding- It is also noted in May 2007 that CLG published "Local authorities and Gypsies and Travellers: a guide to responsibilities and powers". At paragraph 20 it identifies in February 2005 that CLG issued interim guidance on how to conduct accommodation needs assessments, which set out some key principles to be followed. In paragraph 22 it outlines the key principles needed to underpin any good quality accommodation assessment. These include that accommodation assessments need to look at both the current shortfall in accommodation as well as projections of future growth. The guide states "there are real issues about overcrowding and suppressed household formation in the Gypsy and Traveller communities, just as with the settled community. The assessment should capture this".</p> <p>15 It is obvious overcrowding has been an issue for some time and that this information could have been gathered when the accommodation needs assessment was being undertaken or prior to the further consultation that took place in June 2008 and/or prior to the additional consultation with Gypsies and Travellers in November 2008. 4NW Consultation Allocation (January 2009)</p> <p>16 The table below gives a comparison of the</p>	PitchesUnauthorised Development:	3	Concealed Households:	4	New household formation*:	10.1 – 10.5	Households currently in bricks and mortar**:	0.95 – 3.15			Total	18.05 – 20.65
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Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>judgement”.</p> <p>28 Following online consultation on a set of pitch provision (Nov/Dec 2008), 4NW issued a further revised provision as set out in Policy L6, Table 7.2. The level of provision now reflects the needs of those currently resident in the North West on pitches/sites without planning permission, anticipated natural growth and net movements between pitches and other forms of accommodation. This also addresses “hidden “ overcrowding on existing sites and concealed Gypsy and Traveller households who currently reside on other caravan sites and holiday parks who remain undetected in GATT’s. The Technical Note indicates “Once again, it should be noted that the Interim Draft figures are not based on a precise mathematics formula”.</p> <p>29 The Central Lancashire authorities again question this “professional judgement” as there is no audit trail where these figures have come from. How does the more equitable distribution of pitches reflect where Gypsies and Travellers want to live? As there is not enough evidence and concise information, 4NW surely cannot make a sound judgement.</p> <p>30 Why is it that the comprehensive GTAA missed the overcrowding issues on existing sites? Why was overcrowding and hidden issues not considered earlier and examined before the main consultation stages arose?</p> <p>31 It is still considered the Technical Note does not present enough detail/evidence as to why 4NW’s extended the figures from those in the GTAA to the ones in the current RSS partial review consultation. It is questionable whether “professional judgement” is enough. The increase is apparently as a result of the closed consultation exercise that was held in November 2008. The results of that consultation presented on 4NW website show in fact that most of the comments posted either reject the figures being put forward by 4NW, or if they do accept them do so on the basis that they reflect the GTAA figures. There needs to be transparency in how the 4NW figures have been reached. There needs to be clarity on what is the actual level of existing provision and why there is such a discrepancy between the papers issued in August 08 and January 09?</p> <p>Other Issues</p> <p>32 How do we know the extent of Gypsy and Traveller households living on other kinds of sites?</p> <p>33 Why is it necessary to seek to house all Gypsy and Traveller households on</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>dedicated sites rather than allowing continued use of other sites (subject to the general restrictions on the use of holiday homes)? 34 Why is it imperative that we meet all possible housing requirements when for the settled community there is a large gap between housing needs and what can be delivered?</p> <p>Ethnic Groupings</p> <p>35 The Gypsy &amp; Traveller population in Preston is made up of Irish Travellers and the GTAA in making its recommendations focused on the future accommodation needs of this ethnic group. There is no indication that those needs have more than doubled since the GTAA was produced. Turnover</p> <p>36 Neither the GTAA, nor the 4NW figures appear to take into account turnover of existing pitches. While these may be relatively settled populations with little movement the issue of turnover should be addressed to ensure that the proposed pitch allocations are not in fact an over-provision.</p> <p>Definition of a transit pitch</p> <p>37 More detail is required on what would be classed as meeting the requirements for transit pitch provision? The draft Partial Review RSS policy proposes that in addition to permanent pitch provision, each of the Lancashire authorities provides 5 transit pitches. These are described as potentially including: 38 Larger pitches on residential sites provide the potential to meet the needs of short term visitors.</p> <p>Formal transit sites Less-equipped 'tolerated' stopping places used on a regular basis Temporary sites with temporary facilities available during an event, family gathering or for part of the year.</p> <p>Central Lancashire Authorities Requirements</p> <p>39 The Central Lancashire Authorities of Preston City, South Ribble and Chorley Councils do not accept the interim draft pitch provision figures and consider interim Draft Policy L6 and Table 7.2 should be simplified to identify exactly what pitch provision figures 4NW require to the period 2021.</p> <p>40 In the absence of any other evidence, consistency and clarity the Central Lancashire authorities continue to support the GTAA recommendations."</p>
Preston City Council		<p>"GTAA Recommendations (May 2007)</p> <p>9 The GTAA recommended for Preston that, in addition to the 12 pitches on site at Leighton Street there should be a further 18 – 21 pitches provided by 2016. The</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.															
		<p>rationale behind this was:</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;"></td> <td style="width: 25%; text-align: right;">3</td> <td style="width: 25%; text-align: right;">Pitches</td> </tr> <tr> <td>Unauthorised Development:</td> <td></td> <td>Concealed Households:</td> </tr> <tr> <td style="padding-left: 20px;">4</td> <td style="padding-left: 20px;">New household formation*:</td> <td style="padding-left: 20px;">10.1 – 10.5</td> </tr> <tr> <td style="padding-left: 20px;">Households currently in bricks and mortar**:</td> <td></td> <td style="padding-left: 20px;">0.95 – 3.15</td> </tr> <tr> <td style="padding-left: 20px;">Total</td> <td></td> <td style="padding-left: 20px;">18.05 – 20.65</td> </tr> </table> <p>*This is identified as 6 up to 2011 and then a multiplier is applied for the period 2011 -2016 giving a range of 4.1 – 4.5. **This is based on a percentage estimate based on findings that between 19% and 63% of the G &amp; T population currently in bricks and mortar accommodation (mainly Ribblesdale) are likely to move back into caravan accommodation.</p> <p>10 The GTTA indicated that no pitches were needed in South Ribble or Chorley for Gypsies and Travellers.</p> <p>11 The basis of the nil requirement for Chorley and South Ribble in the Lancashire Gypsy and Traveller Accommodation Assessment is that there were no recorded incidents of unauthorised encampments/sites and no planning applications in the five years preceding the study. In other words there was no evidence that pitches were needed.</p> <p>12 South Ribble’s records show they had one brief visit by travellers in early 2007 who were in transit to another destination.</p> <p>13 Chorley Council’s records show that since 2007 there have only been 1 or 2 brief visits by travellers who were in transit to another destination.</p> <p>14 Overcrowding- It is also noted in May 2007 that CLG published “Local authorities and Gypsies and Travellers: a guide to responsibilities and powers”. At paragraph 20 it identifies in February 2005 that CLG issued interim guidance on how to conduct accommodation needs assessments, which set out some key principles to be followed. In paragraph 22 it outlines the key principles needed to underpin any good quality accommodation assessment. These include that accommodation assessments need to look at both the current shortfall in accommodation as well as projections of future growth. The guide states, “there are real issues about overcrowding and suppressed household formation in the Gypsy and Traveller communities, just as with the settled community. The assessment should capture this”.</p> <p>15 It is obvious overcrowding has been an issue for some time and that this information could have been gathered when the accommodation needs assessment was</p>		3	Pitches	Unauthorised Development:		Concealed Households:	4	New household formation*:	10.1 – 10.5	Households currently in bricks and mortar**:		0.95 – 3.15	Total		18.05 – 20.65
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**Organisation:**

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

being undertaken or prior to the further consultation that took place in June 2008 and/or prior to the additional consultation with Gypsies and Travellers in November 2008. 4NW Consultation Allocation (January 2009)

16 The table below gives a comparison of the GTAA and 4NW pitch provisions allocations in Lancashire. Local Authority Current authorised provision Additional GTAA proposed to 2016 Additional 4NW permanent proposed to 2016 Additional 4NW transit proposed to 2016 Total 4NW additional proposed

	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches	Pitches
Darwen	48	69-83	60	5	65	Blackpool	51	24	10	5	15	
Burnley	0	6-7	20	5	25	Chorley	0	0	10	5	15	Fylde
	0	1.0	10	5	15	Hyndburn	86	30-33	45	5	50	
Lancaster	142	29-30	45	5	50	Pendle	0	2	15	5	20	
Preston	12	18-21	45	5	50	Ribble Valley	0	6	10	5	15	
Rossendale	0	0	10	5	15	South Ribble	0	0	10	5	15	
West Lancs.	0	17	20	5	25	Wyre	0	0	10	5	15	Total
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17 The 4NW consultation report proposes an additional 45 permanent residential pitches in Preston by 2016 giving, with the existing provision at Leighton Street, a permanent provision of 57 pitches. In addition to that 4NW propose an additional 5 transit pitches.

18 The 4NW consultation report proposes a new provision of 10 permanent residential pitches and 5 transit residential pitches for both South Ribble and Chorley Councils to 2016.

19 In addition beyond 2016 to 2021 provision should be made across the region for an annual 3% compound increase in the level of overall residential pitch provision. This would mean that Preston would need to provide an additional 54 permanent residential pitches and 6 transit residential pitches up to the period 2021, South Ribble and Chorley Councils will need to identify 12 permanent residential pitches and 6 transit residential pitches to the period 2021. These pitch provision figures are not a maximum provision as best practice suggests that the pitch provision figure should be rounded up in 5's. This also allows for fool proofing for the future.

20 The Central Lancashire authorities consider information on the collection of the evidence base is not up to date as the GTTA is only robust enough to go to 2016. What evidence is there that the annual 3% compound increase beyond 2016 is the annual

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>growth rate that should be applied?</p> <p>21 It is considered there are a disproportionate number of pitches proposed in Lancashire compared to Merseyside and Greater Manchester, where it is understood the greatest need/demand lies.</p> <p>22 The only authorities to benefit from the 4NW proposal compared with the GTAA figures are Blackburn with Darwen and Blackpool. It is unclear why this is the case?</p> <p>23 The overall additional provision proposed by 4NW, including transit pitches, represents an increase above the range proposed in the GTAA of between 74% and 93% depending on whether the higher or lower range figures from the GTAA are used. It is difficult to understand the methodology or on what basis this has resulted in this overall increase. Where is the justification for an increase of this magnitude? The Central Lancashire authorities do not accept that an increase from 200 pitches (GTAA figure to 2016) in Lancashire to nearly 400 pitches (4NW figure to 2016) has resulted because of undercounting and overcrowding/doubling up on existing sites. There does not seem to be any hard evidence on these issues.</p> <p>24 The permanent residential requirements of 12 pitches (compound by 3%) for South Ribble and Chorley Councils are the lowest pitch requirements (6 authorities have this requirement) within Lancashire but there is no comparison to the nil local requirements established in the GTAA. The transit pitch requirement is the same as the rest of Lancashire – 5 pitches for every local authority, and within the Lancashire - wide requirement established by the GTAA."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
Preston City Council	Contained in comments above
Preston City Council	<p>"Technical Note on how the Interim Draft Policy Figures were derived (February 2009)</p> <p>25 The 4NW technical note confirms the GTAA study recommended that the identified needs did not necessarily mean they should be met in specific localities and that decisions about where need should be met should be taken on a strategic basis through partnership working between regional and sub regional/local organisations. This included the consultation stages on the 3 options undertaken in June 2008 and clear support for option 3 working with sub-regional partnerships and the Gypsy and Traveller Community to agree a more balanced share of meeting need across districts, reflecting a wider range of factors other than solely the "need where it arises" basis.</p> <p>26 This work with sub regional partnerships and the Gypsy and Traveller Community has seen pitch provision distributed to meet the requirements for Gypsies and Travellers so that they have the same chance to enjoy equal (or comparable) access to services and facilities, social and economic opportunities, as the settled community and thus contribute towards community cohesion and sustainable communities.</p> <p>27 The Technical Note indicates that using the evidence base and feedback from the consultations 4NW officers then made a professional policy judgement to come up with an initial set of pitch provision. The technical note states "this is not based on a precise mathematical formula". The Central Lancashire authorities question this "professional judgement".</p> <p>28 Following online consultation on a set of pitch provision (Nov/Dec 2008), 4NW issued a further revised provision as set out in Policy L6, Table 7.2. The level of provision now reflects the needs of those currently resident in the North West on pitches/sites without planning permission, anticipated natural growth and net movements between pitches and other forms of accommodation. This also addresses "hidden " overcrowding on existing sites and concealed Gypsy and Traveller households who currently reside on other caravan sites and holiday parks who remain undetected in GATT's. The Technical Note indicates "Once again, it should be noted that the Interim Draft figures are not based on a precise mathematics formula".</p> <p>29 The Central Lancashire authorities again question this "professional judgement" as there is no audit trail where these figures have come from. How does the more equitable distribution of pitches reflect where Gypsies and Travellers want to live? As there is not enough evidence and concise information, 4NW surely cannot make a sound judgement.</p> <p>30 Why is it that the comprehensive GTAA missed the overcrowding issues on existing sites? Why was overcrowding and hidden issues not considered earlier and examined before the main consultation stages arose?</p> <p>31 It is still considered the Technical Note does not present enough detail/evidence as to why 4NW's extended the figures from those in the GTAA to the ones in the current RSS partial review consultation. It is questionable whether "professional judgement" is enough. The increase is apparently as a result of the closed consultation exercise that was held in November 2008. The results of that consultation presented on 4NW</p>

Organisation:	5. Do you have any comments to make about the supporting text?
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## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Preston City Council	Contained above
Preston City Council	<p>"Other Issues</p> <p>32 How do we know the extent of Gypsy and Traveller households living on other kinds of sites?</p> <p>33 Why is it necessary to seek to house all Gypsy and Traveller households on dedicated sites rather than allowing continued use of other sites (subject to the general restrictions on the use of holiday homes)?</p> <p>34 Why is it imperative that we meet all possible housing requirements when for the settled community there is a large gap between housing needs and what can be delivered?"</p>

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Preston City Council	-
Preston City Council	<p>"Ethnic Groupings</p> <p>35 The Gypsy &amp; Traveller population in Preston is made up of Irish Travellers and the GTAA in making its recommendations focused on the future accommodation needs of this ethnic group. There is no indication that those needs have more than doubled since the GTAA was produced.</p> <p>Turnover</p> <p>36 Neither the GTAA, nor the 4NW figures appear to take into account turnover of existing pitches. While these may be relatively settled populations with little movement the issue of turnover should be addressed to</p>

Organisation:	7. Any other comments?
	<p>ensure that the proposed pitch allocations are not in fact an over-provision.</p> <p>Definition of a transit pitch</p> <p>37 More detail is required on what would be classed as meeting the requirements for transit pitch provision? The draft Partial Review RSS policy proposes that in addition to permanent pitch provision, each of the Lancashire authorities provides 5 transit pitches. These are described as potentially including:</p> <p>38 Larger pitches on residential sites provide the potential to meet the needs of short term visitors.  Formal transit sites      Less-equipped 'tolerated' stopping places used on a regular basis  Temporary sites with temporary facilities available during an event, family gathering or for part of the year.      Central Lancashire Authorities Requirements</p> <p>39 The Central Lancashire Authorities of Preston City, South Ribble and Chorley Councils do not accept the interim draft pitch provision figures and consider interim Draft Policy L6 and Table 7.2 should be simplified to identify exactly what pitch provision figures 4NW require to the period 2021.</p> <p>40 In the absence of any other evidence, consistency and clarity the Central Lancashire authorities continue to support the GTAA recommendations."</p>

## Sefton MBC

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Sefton MBC	No	Because of the pitch distribution figures

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Sefton MBC	No	<p>Please note: delegated authority as been granted to Sefton officers to make an official response on behalf of Sefton Council.</p> <p>Sefton was included in the Merseyside Gypsy &amp; Traveller Accommodation Assessment (MG&amp;TAA). Whilst Sefton generally supports the draft Gypsy &amp; Traveller policy we do not support the number of permanent residential and transit Gypsy &amp; Traveller pitches allocated to Merseyside. The figures are different to the recommendations of the M&amp;GTAA without a clear and adequate justification. We feel that the Merseyside G&amp;TAA is the best available estimate of need in the study area. We have not been made aware of any serious deficiencies of the methodology of the MG&amp;TAA, which was conducted by Salford Housing and Urban Studies Unit (SHUSU). In partnership with the University of Birmingham Centre For Urban and Regional Studies (CURS), SHUSU also prepared the North West Regional GTAA and wrote the NW G&amp;TAA: A Good Practice Guide (May 2007), as published on the 4NW technical website. In an e-mail of the 20th January 2009 to participants in the consultation on the Partial Review of RSS, 4NW refers to paragraph 4 of the supporting text of the "Interim Draft Policy L6 - Scale and</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.3?	4. Please tell us why you have given this response.
		<p>Distribution of Gypsy &amp; Traveller Pitch Provision": "In addition [to the evidence from the G&amp;TAAs] an allowance has been made to address the issue raised by the Gypsy and Traveller community of "hidden" overcrowding on existing sites and concealed Gypsy &amp; traveller households who currently reside in other caravan sites and holiday parks, who for various cultural and management reasons remain undetected in G&amp;TAAs."</p> <p>The exact nature of the comments by the Gypsy &amp; Traveller community mentioned in paragraph four has not been disclosed. In the "4NW – Consultation Forum on draft Gypsy and Travellers and Travelling Showpeople policies" report published by CAG in January 2009 and then revised in February 2009, there are no comments about the figures for the MG&amp;TAA study area being inaccurate. The notes from two meetings, with Travelling Showpeople on the 9th December 2008 and (presumably) Gypsies &amp; Travellers on the 19th December 2008 have been removed, making it unclear what exactly was said regarding the G&amp;TAA site provision figures.</p> <p>4NW published a "Technical Note on how the Interim Draft Policy Figures for Gypsies and Travellers, and travelling Showpeople (North West Regional Spatial Strategy Partial Review) were derived" in February 2009. This explains that the Gypsy &amp; Traveller figures were adjusted following the Gypsy &amp; traveller workshop in December 2008 by adding 70% to the existing provision, and then modified again (in an unspecified way) following the receipt of feedback during the November / December 2008 consultation. There is no detailed justification for exact figure (70%) initially added, nor for the subsequent modification. There is also no detail of how any re-distribution within or between sub-regions has been calculated. In contrast to the above, the MG&amp;TAA (as did other G&amp;TAAs) followed the NW G&amp;TAA Good Practice Guidance. On Merseyside, SHUSU interviewed 21 households on Social Rented sites (70% of the total on sites), 2 on unauthorised encampments and 49 in bricks and mortar housing (70% of the total identified). The calculation of need allows for the growth of the estimated total number of households and takes account of concealed households.</p> <p>Therefore Sefton does not accept that the MG&amp;TAA did not adequately identify the need arising from "hidden" overcrowding on existing sites and concealed households.</p> <p>The MG&amp;TAA found that only 10 transit pitches were required in the whole of Merseyside, as opposed to the 20 suggested by the draft policy L6. Furthermore, it found that no further transit provision was required beyond 2012 as "the level of travelling will not increase in the foreseeable future and other surrounding local authorities will also have developed transit options" (p10, Merseyside GTAA). No</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
		<p>evidence has been presented to suggest an alternative requirement. It is unclear how the distribution of permanent G&amp;T sites in Merseyside is in accordance with Option 3 of the June 2008 consultation, which the Technical Note (February 2009) says was the favoured option.</p> <p>Option 3 requires: "a more balanced share of meeting need across the districts, reflecting a wider range of factors other than solely the "need where it arises" basis". Instead the distribution requires an increase of 30 pitches in Sefton by 2016 and 25 in Liverpool, almost double the additional 16 and 14 required by the MG&amp;TAA.</p> <p>There is no justification for any increase in the Merseyside area beyond what the G&amp;TAA suggested, let alone concentrating it in two authorities. These changes do not accord with Option 3 as they exacerbate unequal provision in the Merseyside study area. We note the 4NW comment that it is not possible to have a precise "mathematic formula" and that some degree of professional officer judgement is necessary when trying to translate the recommendations of the GTAA's into RSS policy and pitch requirements for individual districts. However, a clear explanation of the factors that 4NW have taken into account and the weighting given to each factor when amending the GTAA recommendations is necessary for Councils to understand the process and give constructive feedback. These factors may include taking account of methodological problems (if any) with a GTAA and redistribution of provision within and between sub-regions. We also note that professional advice on how best to collect together and adjust the findings of the several GTAA's does not seem to have been sought from the authors of the GTAA's.</p> <p>It is clear that neither 4NW or any other organisation has produced a robust alternative to the site provision figures in the MG&amp;TAA. Sefton will of course consider any evidence provided to the Council that the MG&amp;TAA estimate of need is wrong and take action accordingly, but in our opinion this has not occurred so far.</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
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<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Sefton MBC	No

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Sefton MBC	No

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Sefton MBC	No

## South Lakeland District Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
South Lakeland District Council		We would expect that the policies on the scale and distribution of gypsy and travellers pitch provision and travelling showpeople plot provision would match that in our own evidence – the Cumbria Gypsy and Traveller Accommodation Needs Assessment. This is necessary to ensure that they are justifiable.

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
South Lakeland District Council		<p>"The draft interim policies propose (for South Lakeland):</p> <ul style="list-style-type: none"> <li>• A minimum of 10 additional permanent residential pitches between 2007 and 2016 for gypsy and travellers.</li> <li>• A minimum of 5 additional transit residential pitches over the same timescale.</li> <li>• A minimum of 5 additional plots for travelling showpeople between 2007 and 2016</li> </ul> <p>The Cumbria Gypsy and Traveller Accommodation Needs Assessment suggest that there is a need for (in South Lakeland):</p> <ul style="list-style-type: none"> <li>• 5 extra residential pitches between 2007 and 2016 for gypsies and travellers</li> <li>• 5 extra transit pitches over the same timescale.</li> <li>• 3 additional plots for travelling showpeople between 2007 and 2016</li> </ul> <p>Therefore it is felt that amendments are required to ensure that the figures in the policy are consistent with evidence and robust. Namely:</p> <ul style="list-style-type: none"> <li>• The target for new permanent residential pitches for gypsies and travellers should be reduced from 10 to 5.</li> <li>• The target for plots for travelling showpeople should be reduced from 5 to 3.</li> </ul> <p>Given that these are intended as minimum standards, and that our LDF will include a positively worded policy on Gypsies and Travellers and Travelling Showpeople (which could support further provision) a higher target is considered unjustified.</p> <p>Indeed, setting a higher target in the RSS could present particular problems for a District where sustainable development land is at a premium."</p>

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
South Lakeland District Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
South Lakeland District Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
South Lakeland District Council	-

## St Helens MBC

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
St Helens MBC	No	Whilst we have no overriding objection to the figures included in Policy L6 these represent a significant increase above the findings of the Cheshire GTAA figures, rising from a maximum of 33 to 45 permanent pitches, together with 5 transit pitches. It remains unclear what the evidence base for these figures is. The Technical Paper indicates that this has not been based on a precise mathematic formula, and whilst the Local Authority accept that there is likely to be an element of professional judgement, it remains unclear from the methodology and evidence provided exactly how the St Helens figures have been arrived at. Whilst we are not discounting the potential need, we would like to reserve the right to query the evidence provided.

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
St Helens MBC	No	The figures represent a significant increase on the findings of the Cheshire GTAA which followed an agreed methodology. Whilst we would not wish to object to making adequate provision, we would like to receive evidence that this is an expression of actual need and represents an equitable distribution amongst local authorities.

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
St Helens MBC	We welcome the principle of broadening the choice available to the Gypsy and Traveller community by providing pitches in areas where previously little provision has been made as this will ensure that local authorities that have in the past made little or no provision will now be required to do so. The policy text indicates that subsequent review will be based on the findings of future GTAA, will a revised methodology be agreed?

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
St Helens MBC	Concern that the primacy of the GTAA seems to have been diluted by this new evidence and where does that leave us with future GTAAs if the methodology was seen to be flawed

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
St Helens MBC	-

## Trafford Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Trafford Council		-

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Trafford Council		

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Trafford Council	-

### 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Trafford Council	-

### 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Trafford Council	-

## Warrington Borough Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Warrington Borough Council	Yes	Warrington Borough Council supports the objectives of and wording of draft policy L6. Given that the current stage of consultation is 'informal', the Council reserves the right to make further comments as part of the formal consultation stage.

**3. Do you / your organisation support the pitch distribution figures in table 7.3?**

**4. Please tell us why you have given this response.**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
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<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Warrington Borough Council	Yes	Whilst there are concerns over the methodology used to adjust the figures derived from the Cheshire Gypsy and Traveller Accommodation Assessment, the Council support the level of provision proposed for the Borough, identified at Table 7.2 of the draft policy, through recognition of the need to provide an increase in, and greater choice and flexibility within, the supply of Gypsy and Traveller pitch provision across the wider region. Given that the current stage of consultation is 'informal', the Council reserves the right to make further comments as part of the formal consultation stage.

## 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Warrington Borough Council	-

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Warrington Borough Council	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
Warrington Borough Council	-

## West Lancashire District Council

**1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?**

**2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)**

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
West Lancashire District Council	No	See comments related to pitch distribution/numbers below

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
West Lancashire District Council	No	<p>The Council has concerns about the figures for permanent pitches contained in Interim Draft Policy L5 for Gypsy and Traveller pitches. The Council suggests a figure of 14 permanent pitches and 10 transit pitches for West Lancashire as an alternative (to 2016). The number of permanent pitches is based on the number of pitches currently on unauthorised developments in West Lancashire as this more accurately represents the demand from the Gypsy and Traveller community for permanent pitches in the District. The Council considers that the number of transit pitches should be raised from 5 to 10 so as to discourage unauthorised encampments and to make it easier to direct Gypsies and Travellers to a transit site. This tends to be more of an issue in West Lancashire.</p> <p>The Council supports a more even distribution of the Gypsy and Traveller pitches, as suggested by Interim Draft Policy L5, over the region.</p>

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
West Lancashire District Council	No

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
West Lancashire District Council	The Council can provide further information on the situation relating to unauthorised developments and encampments if 4NW would find this useful. The information is available online as part of the report to the Council's Gypsy and Traveller Sites Committee at <a href="http://webdocs.westlancsdc.gov.uk/coins/submissiondocuments.asp?submissionid=7752">http://webdocs.westlancsdc.gov.uk/coins/submissiondocuments.asp?submissionid=7752</a> .

## Wirral MBC

### 1. Do you / your organisation support the Interim Draft Policy L6 – Scale & Distribution of Gypsy & Travellers Pitch Provision?

### 2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
Wirral MBC	No	Wirral Council has a firm and stated commitment to work closely with its partners to ensure that everyone living, visiting and working in the Borough will be treated fairly and with respect regardless of their race, gender, age, disability, sexual orientation or

<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
		<p>faith. However, in this case the Council is concerned that Draft Interim Policy L6 and the proposed pitch distribution figures set out in Table 7.2 are not supported by the available evidence. In particular, it is not clear why the resultant numbers for the Region should exceed the needs assessed in sub-regional GTAA's prepared in accordance with national advice, especially as the figures in Draft Interim Policy L6 are already expressed as "at least" and the figures in Table 7.2 are expressed as the minimum to be provided. While the supporting text refers to an additional allowance for hidden "overcrowding", it is not clear how this has been assessed and applied to each district. The statement that where Local Development Frameworks look beyond 2016 provision will be made for the same proportion of the regional requirement as in Table 7.2 for 2007-2016 is not clear. It is, for example, not clear whether the annual 3% compound increase to be applied post-2016 will be applied pro-rata at district level, irrespective of evidence of local need or demand.</p> <p>The requirement for new major developments to include provision for gypsies and travellers is unduly restrictive and poorly defined in terms of the types of land use or development being considered and appears contrary to the intention to identify sites through Local Development Frameworks. The Policy text with regard to sites in the Green Belt should better reflect the comments provided in the supporting text, which make it clear that this option should be a last resort, in exceptional circumstances, where all other alternatives have been exhausted.</p> <p>While the text on the possibility of redistributing provision through the preparation of joint or co-ordinated Local Development Documents is welcome, the implications of a "co-ordinated" approach should be clarified in the supporting text for the avoidance of doubt.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.3?

#### 4. Please tell us why you have given this response.

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.3?</b>	<b>4. Please tell us why you have given this response.</b>
Wirral MBC	No	<p>The assumption that every district should be required to make provision, unrelated to actual need or demand, is flawed. Wirral, for example, as a peninsula, is not a traditional resort for gypsies and travellers. The Borough has had nil caravan counts for at least 10 years and no record of unauthorised encampments since December 2006, suggesting that provision on the scale envisaged may rarely, if ever, be used.</p> <p>The Merseyside GTAA recommended a strategic approach and stated the split between local authorities was indicative only and that the numerical results of the apportionment should not necessarily be assumed to imply that those needs should actually be met in that specific locality. This is re-iterated in footnote 4 to paragraph 5 of the supporting text. No evidence has been provided on working and/or travelling patterns in support of the figures proposed.</p> <p>The number of transit pitches identified for the Merseyside Sub-Regional Partnership area far exceeds (doubles) the local assessment carried out as part of the Merseyside GTAA. The statistical basis for this higher figure is not apparent and it is, for example, unclear how this is related to assessed need.</p>

### 5. Do you have any comments to make about the supporting text?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>5. Do you have any comments to make about the supporting text?</b>
Wirral MBC	The supporting text should explain how "hidden" overcrowding and transit provision has been assessed, identified, verified and applied. Further information should also be provided on current working and travelling patterns in support of the figures proposed.

## 6. Do you have any additional information or evidence that you would like 4NW to consider?

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Wirral MBC	-

## 7. Any other comments?

The table below shows the verbatim comments received.

Organisation:	7. Any other comments?
Wirral MBC	-