



North West Plan Partial Review

**ACCOMMODATION FOR GYPSIES
AND TRAVELLERS AND
TRAVELLING SHOWPEOPLE,
AND REGIONAL PARKING STANDARDS**



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**Report of the Panel
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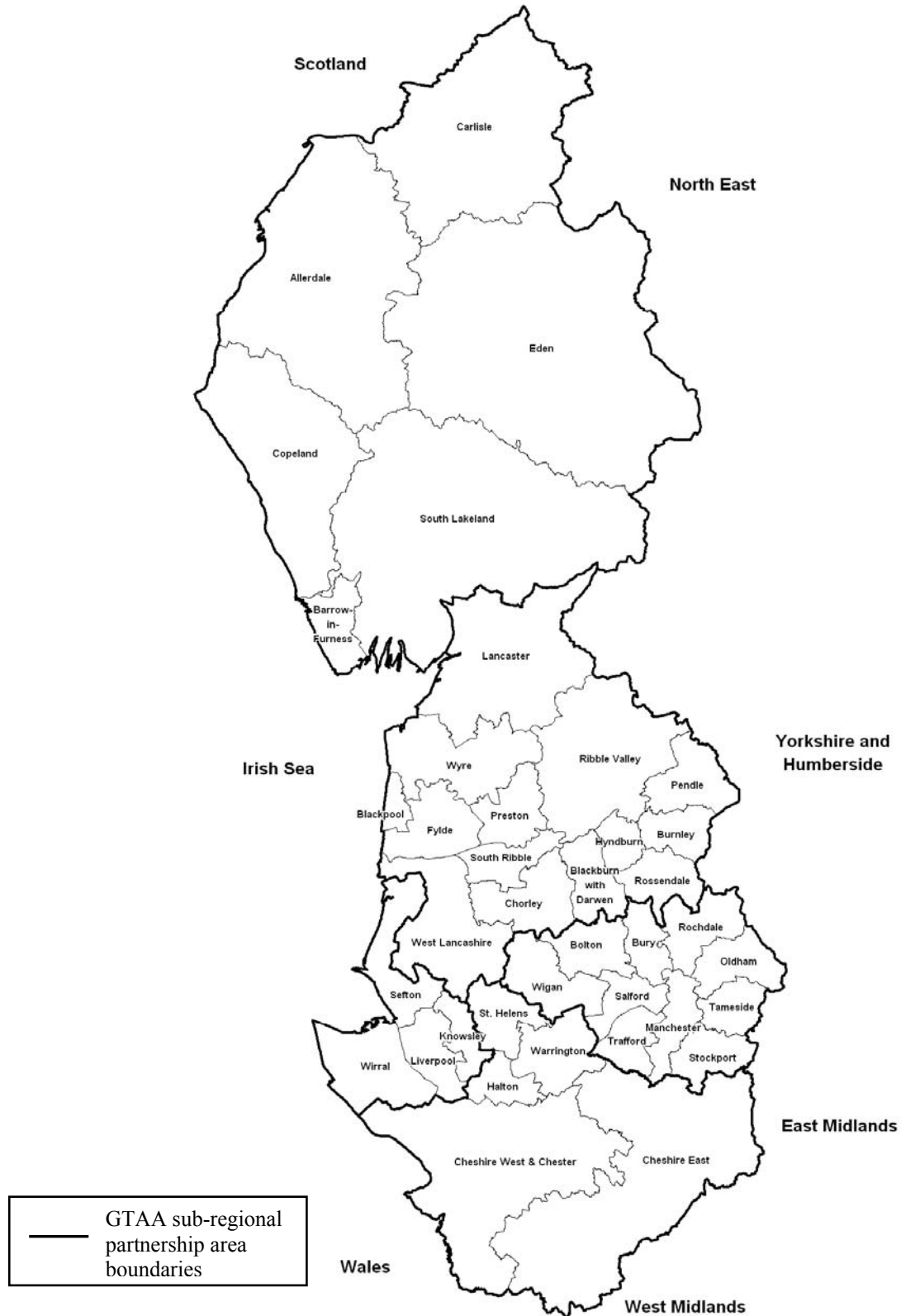
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Not issued

LOCAL AUTHORITIES IN NORTH WEST ENGLAND

UNITARY AND DISTRICT AUTHORITY BOUNDARIES



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PREFACE ON THE CHANGING REGIONAL CONTEXT

This report gives the conclusions and recommendations arising from our examination of the North West Plan Partial Review, submitted to the Secretary of State in July 2009. The debates themselves were the last to be held under the Examination in Public (EiP) procedures set out in PPS11. They were held in the month before the commencement of Part 5: Regional Strategy, of the Local Democracy, Economic Development and Construction Act 2009.

This means that it will be for the Responsible Regional Authorities (4NW as the Regional Leaders' Board and the Northwest Regional Development Agency) to receive this Panel report and decide how to take it forward. If this is via the Regional Strategy process, they would presumably provide reactions to our recommendations for policy revisions to the Secretary of State¹. The Secretary of State would then issue any proposed changes for consultation before finalising and publishing the Partial Review.

If there are any delays in this intended process, it is possible that our Panel report will be the most recent evidence to support the allocation of land for Gypsy and Traveller pitches and Travelling Showpeople plots in Development Plan Documents. It may also be cited as a material consideration in the determination of planning applications and appeals.

In the event that the regional planning process is dismantled, it is hoped that the evidence tested in this report will reinforce the importance of continued planning to provide adequately for Gypsy and Traveller and Travelling Showpeople accommodation. "Spend to save" was a frequent motto repeated at this EiP, where the implied savings referred not just to reduced public expenditure on maintenance, cleanup and enforcement of unauthorised Gypsy and Traveller encampments, but also to avoiding the social costs of tensions with the settled community, and enabling greater economic contributions from these sectors of society when they have better access to education and healthcare.

The potential uncertainties hanging over regional planning are of great concern to representatives of the Gypsy and Traveller and Travelling Showpeople communities. They have participated constructively in the process of preparing Gypsy and Traveller Accommodation Assessments, and contributed fully to the EiP debates. They fully support the objectives of current Government policy and are optimistic about the prospects of real improvement being delivered on the ground if local authorities carry through delivery of additional pitch and plot provision. But their trust is fragile and could easily be lost if early results are not achieved.

These issues of trust do not apply to the same extent to the consideration of parking standards, but nonetheless we consider that there are real advantages in co-ordinating them at the regional level.

¹ in accordance with the Government's Policy Statement on Regional Strategies, p18, CLG and Department for Business Innovation and Skills, Feb 2010 (PD23)

1 INTRODUCTION

Matter 2.4 and all generally

This chapter examines the regional context and existing policy framework within which the partial review of the North West of England Plan is set. The chapter then considers the draft Policies against the soundness tests as set out in Planning Policy Statement (PPS)11.

CONTEXT

- 1.1 The three topics which constitute the subject matter of this examination were brought forward as a partial review of the North West of England Plan (North West Plan), adopted in September 2008. Of these the proposed parking standards represent a revision to the final bullet of Policy RT2 on traffic demand management, while the proposed provision of additional accommodation for Gypsies and Travellers and Travelling Showpeople represent new topics to be added to the Plan.
- 1.2 The North West region is one of the most diverse in the country, including the conurbation areas of Greater Manchester and Merseyside and their commuter belts beyond, former new towns, the Pennine industrial towns, coastal resorts, and more sparsely populated rural areas in Cumbria.
- 1.3 There are extensive areas of Green Belt around and within the 2 conurbations and around the Pennine Lancashire towns. There are also large areas of Flood Zones 2 and 3² around the coast and its estuaries, and smaller areas along various parts of the river system inland. Extensive areas designated for their international importance for nature conservation and for national scenic and landscape value are located around parts of the coast and in various upland areas, particularly in the northern half of the region³.
- 1.4 In respect of Gypsies and Travellers, the North West has what was described as an unusually settled population. Communities are located throughout the region in the main urban areas (in both bricks and mortar and on sites), and in semi-rural locations. Those on caravan sites are concentrated within certain local authority areas.
- 1.5 Existing accommodation for Travelling Showpeople is even more concentrated with 80% being located in Greater Manchester. The size of this community is however much smaller than for Gypsies and Travellers.
- 1.6 The 39 current unitaries and districts, together with the Lake District National Park Authority, worked together as 5 sub-regional partnerships⁴ in the preparation of Gypsy and Traveller Accommodation Assessments (GTAAAs⁵), which were a major source of evidence for the development of draft Policies L6 and L7.
- 1.7 The geographical diversity of the region is particularly relevant when considering parking standards. The need for demand management measures is most apparent in and

² Gypsy and Traveller and Travelling Showpeople caravan sites for permanent occupation should not be permitted in Flood Zones 3A and 3b. In Flood Zone 2 they would only be acceptable after applying the sequential test to lower risk areas and then the exception test (PPS25 Development and Flood Risk, Tables D.2 and D.3 and para D10, CLG, Dec 2006. NB The revision in March 2010, after the close of the EiP, does not affect this policy statement)

³ Environmental Constraints map submitted by GONW and tabled at EiP sessions on Matters 3 and 4, March 2010 (PD12)

⁴ Ribble Valley BC commissioned its own GTAA

⁵ This terminology is retained for consistency with the Partial Review policy document and Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites, ODPM, Feb 2006 (GT2). It is recognised that a fuller description (Gypsies and Travellers Accommodation Needs Assessments, GTANA) is used in more recent national guidance

around the 2 regional centres and in the other main city and town centres. Parking issues also arise in other parts of the region, including in tourist areas such as the Lake District National Park. The extent and frequency of public transport alternatives to the car varies considerably throughout the region.

- 1.8 There appears to have been some joint working on the review of parking standards: at Passenger Transport Authority (PTA) level within the 2 conurbations, although extended in the case of Merseyside to include Halton⁶; within the Lancashire area including Blackpool and Blackburn with Darwen; and within Cumbria including the Lake District National Park. We are unaware of working arrangements within the 2 Cheshire unitaries and Warrington.

EXISTING POLICY FRAMEWORK

- 1.9 Circular 01/2006 sets out national policy on planning for Gypsy and Traveller caravan sites, including the role of RSS and the way it should be produced⁷. One of the main intentions of this national policy framework is *"to increase significantly the number of Gypsy and Traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years"* (para 12c). Circular 04/2007 provides the equivalent national policy on planning for Travelling Showpeople.
- 1.10 National guidance on parking standards is spread between Planning Policy Guidance note (PPG)13 (March 2001), Planning Policy Statement (PPS)3 (November 2006) and PPS4 (December 2009). It has become less prescriptive over time and increasingly seen as a local responsibility. Parking policy is at the interface between the responsibilities of Local Planning Authorities (LPAs) and Local Transport Authorities (LTAs), of which there are 9 in this region.
- 1.11 The two new policies and one policy revision need to fit within the North West Plan. The most relevant policies for our consideration of Gypsy and Traveller and Travelling Showpeople accommodation are identified in draft Policies L6 and L7 (6th and 5th paragraphs respectively). Of particular importance to parking standards are the overall spatial strategy, particularly Policies RDF1 on spatial priorities and RDF2 on rural areas, and Policy DP5 the development principles on managing travel demand.
- 1.12 The Regional Spatial Strategy (RSS) became part⁸ of the new Regional Strategy on 1 April 2010⁹. The Responsible Regional Authorities (4NW and the Northwest Regional Development Agency, NWDA) will decide after receiving this Panel report on how and in what form to take finalisation of this RSS Partial Review forward.

SOUNDNESS

- 1.13 In testing the soundness of the draft Policies we used the issues raised by the soundness tests in PPS11, paragraph 2.49 to inform our questioning at the Examination, rather than to structure our list of matters for debate.
- 1.14 Three of the soundness tests are of particular interest to this Partial Review. First with respect to the evidence base (test vi), we have found the primary source of evidence, namely the suite of GTAAs as supplemented with survey work by the Showmen's Guild of Great Britain, to be generally robust and consistent. We are satisfied that 4NW has

⁶ consistent with the definition of the Liverpool city region in the North West of England Plan, Regional Spatial Strategy to 2021, p136, GONW and CLG, Sept 2008 (RSS1)

⁷ Circular 01/2006, Planning for Gypsy and Traveller Caravan Sites, paras 22-26, Feb 2006 (GT2)

⁸ The other part is the Regional Economic Strategy

⁹ Local Democracy, Economic Development and Construction Act 2009, Section 70(6)

taken a strategic view of this evidence and other factors at the regional level in putting forward the pitch and plot distribution by district, as it is entitled to do. On parking we have found the technical research by Mouchel¹⁰ to be generally robust although we take a different view on the practicality of one of its recommendations [paras 11.22-11.25¹¹].

- 1.15 Second, we have satisfied ourselves that the preparation of the draft Policies has included sufficient community involvement (test vii). There have been workshops and dialogue meetings with representatives of the Gypsy and Traveller and Travelling Showpeople communities in at least 2 stages of the process. There have been formal public consultations at the issues and options stage, the interim draft policy stage, and the submitted draft stages. Local authorities had an additional opportunity for informal comment in a web-based forum before the interim draft policy stage. On parking there were opportunities for technical involvement in the Mouchel study, together with the same formal public consultation stages. Despite these opportunities there was relatively little feedback from business users – a gap which we have sought to plug through additional invitations to participate in the EiP.
- 1.16 Also of relevance is whether the preparation of the draft Policies has been subject to a satisfactory Sustainability Appraisal (SA) (test x). We are broadly content that the process undertaken has followed the stages set out in national guidance¹², and Government Office for the North West (GONW) confirmed that the process was sound in its opinion. Having said that, we did not find the SA results particularly illuminating and were surprised that there was no recognition of the specific interpretation of sustainability in respect of Gypsy and Traveller and Travelling Showpeople set out in the 2 national Circulars.
- 1.17 The SA included a Habitats Regulation Assessment screening. This concluded that there are unlikely to be significant adverse effects upon international sites of nature conservation importance from policies on Gypsies and Travellers, Travelling Showpeople and parking standards¹³. Natural England was satisfied that this work had been undertaken appropriately.
- 1.18 In terms of the remaining soundness criteria, we are satisfied that the draft Policies, with the adjustments that we recommend in this report:
 - provide a spatial framework at an appropriate scale and do not descend to the site-specific level (tests i and ii);
 - are broadly consistent with national planning policy (test iii);
 - are compatible with the rest of the North West Plan. See also our discussion on inter-regional implications, para 2.7 (test iv);
 - are internally consistent in dealing with the 2 related topics of Gypsy and Traveller and Travelling Showpeople accommodation (test v);
 - take account of likely levels of grant funding and consider other delivery mechanisms. We have suggested additional points that could usefully be included in the supporting text to Policies L6 and L7 [Recommendations (R) 8.1], and on additional monitoring [R8.2-8.3] (tests viii, ix and xii);
 - have complied with proper procedures in its preparation, including 4NW Member endorsement of key stages (test xi).

¹⁰ Review of Regional Parking Standards Final Report, Mouchel for the NWRA, Dec 2008 (RP2)

¹¹ Square brackets are used throughout to give cross-references within this Panel report

¹² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, Nov 2005

¹³ Representation 41

2 SCALE OF GYPSY AND TRAVELLER RESIDENTIAL PITCH PROVISION

Matters 2.1, 2.2, 2.3, 4.1, 4.3 & 5.1

This chapter examines the robustness of the Gypsy and Traveller Accommodation Assessments from which the regional and sub-regional estimates of need have been derived. It analyses the scope of the GTAAs in terms of whether all relevant parts of the travelling community have been adequately covered, and the combined results in terms of components of need. It examines challenges to the regional total and recommends a change to the regional pitch estimate. It then analyses whether the draft Policy adequately addresses both the short term and longer term needs.

EVOLUTION OF THE RESIDENTIAL PROVISION IN POLICY L6

- 2.1 Draft Policy L6 states that provision will be made for at least 825 net additional residential pitches for Gypsies and Travellers over the period 2007-2016. As the current authorised provision, updated through the EiP, is 970 [paras 3.22 and 3.23], this would represent an increase of 85%.
- 2.2 The pitch requirement figure to 2016 is largely based upon a summation of the totals set out in the sub-regional GTAAs. The regional GTAA, the Ribble Valley GTAA and 4 of the 5 sub-regional GTAAs were carried out by the same consultants resulting in a high level of consistency between them. We acknowledge that some of these GTAAs were published in advance of the publication of a methodology designed to be used by Regional Planning Bodies (RPBs) in determining the scale and distribution of pitches for inclusion in RSS¹⁴. However, as one of the organisations that prepared this advice, Salford Housing & Urban Studies Unit, also prepared all but one of the GTAAs within the North West region, a high level of consistency with the advice and between the individual GTAAs was achieved. This proved to be very beneficial to us as the results of the GTAAs are thus directly comparable.
- 2.3 The benchmarking exercise carried out by 4NW¹⁵ confirmed this high level of consistency between all the GTAAs and compliance with the advice. This benchmarking exercise was relatively limited in its scope but given the similar form of the GTAAs this is not considered to diminish the relevance of its conclusions.
- 2.4 4NW's estimate of additional residential pitches required throughout the region between 2007-2016, loosely based on the sub-regional GTAAs, was initially 980. This was the subject of a web-based forum involving the local authorities in autumn 2008¹⁶. This regional estimate was further increased to 1,250 residential pitches for the formal consultation at the interim draft policy stage, an uplift of over 50% on the aggregated needs total from the GTAAs. 4NW clarified in debate that this uplift responded to suggestions made by Gypsy and Traveller representatives at a workshop in December 2008 of additional sources of need, such as "hidden" overcrowding on existing sites, and concealed Gypsy and Traveller households living on other caravan sites and holiday

¹⁴ Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies, CLG, March 2007 (GT4)

¹⁵ Technical Background paper - Gypsies and Travellers and Travelling Showpeople Pitch provision, Appendix 1, p17, 4NW, July 2009 (PR7)

¹⁶ Draft Pitch Distribution for the accommodation of Gypsies and Travellers policy, web forum consultation, 4NW, Nov 2008 (PRE18)

parks¹⁷. 4NW's Technical Note stated that this judgement was not based upon a precise mathematical formula.

- 2.5 The regional pitch estimate was reduced to 825 in the submitted draft Policy following responses to the interim draft policy consultation.

ROBUSTNESS OF REGIONAL NEEDS ESTIMATE TO 2016 FOR GYPSIES AND TRAVELLERS

Whether needs of all relevant groups are adequately covered

- 2.6 Overall we consider that the background work to establish the needs of Gypsy and Traveller communities has been done very thoroughly in this region. The DVD produced by 4NW ("Somewhere to Live") sought to give confidence in the process early on and to dispel apprehensions within the settled community. Commissioning a GTAA at regional scale sought to give a consistent baseline and method¹⁸, as did the regionally specific GTAA method guidance¹⁹. The use of interviewers from the Gypsy and Traveller communities within most, if not all, of the sub-regional GTAAs was designed to instil trust for individuals to take part in the surveys. Housing as well as planning officers were involved in the interpretation of the GTAA interview findings.
- 2.7 The only category of potential need that appears not to have been considered at all is inter-regional migration (relevant to soundness test iv). Heine Planning gave an example of Scottish Travellers known to be seeking to self provide on sites in Cumbria. There were also references to Gypsies and Travellers moving into parts of Cheshire. However in the absence of any local data in and around this region it cannot be known whether any such in-migration is greater or lesser in scale than any Gypsies and Travellers moving out of the region. But we have noted an inference that in net terms, migration within the country as a whole may have been towards more prosperous parts of southern England with their greater employment opportunities²⁰. In our view there is no evidence base on which 4NW could have substantiated any change to their regional pitch estimate to take account of cross-boundary issues.
- 2.8 The needs of New Travellers are intended to be covered within GTAAs²¹ (and they are included in the planning definition of Gypsies and Travellers). The fact that only one interview was conducted (in the Lancashire GTAA) appears to reflect the virtual absence of a population of New Travellers in this region according to GONW, rather than any methodological failing. We are therefore content that there are no references needed in draft Policy L6 to their particular needs.
- 2.9 Possible undercounting of need was identified by some participants, particularly in respect of Gypsies and Travellers in bricks and mortar containing concealed households aspiring to move onto caravan sites. This is a notoriously difficult issue given the uncertainties in establishing the size of the Gypsy and Traveller population in bricks and mortar in the first place. This is a sector of society that for various reasons has learnt to keep a low profile.

¹⁷ Technical Note on how the Interim Draft Policy Figures for Gypsies and Travellers and Travelling Showpeople were derived, para 6.3, 4NW, Feb 2009 (PRE9A)

¹⁸ even though some of the more detailed sub-regional results subsequently superseded this

¹⁹ North West Gypsy and Traveller Accommodation Assessments, - A Good Practice Guide, SHUSU & Pat Niner, May 2007 (RGT14)

²⁰ Preparing RSS Reviews on Gypsies and Travellers by RPBs, p32, CLG, March 2007 (GT4)

²¹ Gypsy and Traveller Accommodation Needs Assessments – Guidance, para 12, CLG, Oct 2007 (GT6)

- 2.10 Nevertheless we consider that a good start has been made in identifying the population in this region. This was conducted most thoroughly in Greater Manchester and a high proportion of the 471 interviews conducted there are likely to have been within this sector. In the other 5 GTAAs just under 200 interviews were conducted with Gypsies and Travellers in bricks and mortar²². Further comments on the extent of any alleged underestimation are given later in this chapter [paras 2.18-2.20].
- 2.11 A final category of possible additional need that in part overlaps with bricks and mortar is East European Roma. Department for Health²³ expressed concerns that little was known about these international in-migrants, but drew attention to one localised example where numbers had increased rapidly. Rochdale BC was able to give further details of particular communities identified as part of the Greater Manchester GTAA, and reported that initial indications from community workers were that few were seeking to return to a nomadic lifestyle. In that the Greater Manchester GTAA covered this category of need, as indeed did earlier work on the regional GTAA²⁴, we do not consider there to be any case on this score for adjusting the regional estimate for additional pitches required. Future GTAAs may be able to improve on estimating needs from Gypsies and Travellers of whatever cultural background in bricks and mortar, possibly with added help from the results of the 2011 Census.
- 2.12 In terms of the definition of Gypsies and Travellers in footnote 1 of the submitted draft policy document, we agree with 4NW that it should be consistent with that in Circular 01/2006, paragraph 15. However it may be sufficient in the final policy wording simply to cross-reference to this definition. In any event we consider that any attempt to change this definition, as suggested by Campaign to Protect Rural England (CPRE) by deleting the grounds on which Gypsies and Travellers might have temporarily ceased travelling, would be open to challenge and could be seriously harmful to parts of the travelling community.

Recommendation 2.1

If footnote 1 remains in full in the final version of Policy L6, insert "whatever their race or origin, including such persons" after habit of life [para 2.12].

Components of need

- 2.13 From the combined GTAA results the largest sources of accommodation needs are from those likely to form new households over the period, and from concealed households and doubling up – a major element of which comes from Gypsies and Travellers in bricks and mortar in Greater Manchester. The next largest component relates to those on unauthorised encampments seeking permanent residential pitches. There is also a much smaller component of need from those on unauthorised developments, i.e. where Gypsies and Travellers have bought land and are occupying it without planning permission, and from those on waiting lists²⁵.

²² by calculation: 58 + 32 + 10 + 41 + 47 from Cumbria, Lancashire, Ribble Valley, Merseyside, Cheshire GTAAs respectively

²³ Representation 50

²⁴ North West Regional GTAA Final Report, pp93-94, SHUSU & Pat Niner, May 2007 (RGT2)

²⁵ Calculation based on the summation of needs estimates given in the Cumbria GTAA Table 34, Lancashire sub-region GTAA Table 29, Ribble Valley GTAA Table 10, Greater Manchester GTAA Table 6.1, Merseyside GTAA Table 37, Cheshire sub-region GTAA Table 33

2.14 The regional total is broadly the sum of its sub-regional components. However, 2 of the GTAAAs (Cheshire Partnership and Lancashire) used ranges of figures, and a third (Greater Manchester) did not differentiate between residential and transit pitches. The overall total, therefore, did not equate precisely to the sub-regional totals.

Challenges to the regional total

2.15 Friends, Families & Travellers and Travellers Law Reform Project (FFT) and Irish Traveller Movement in Britain (ITMB) argued for the use of the higher regional total included in the interim draft policy consultation. They considered that it better reflected the scale of needs given the likely under-recording of the Gypsy and Traveller population in the region, and hence an understatement of wishes to move back onto caravan sites. We do not consider that it would be appropriate to uplift the GTAA figures to such an extent. There is no hard evidence to support this level of underestimating needs. Heine Planning and Cheshire West and Chester Council confirmed that 4NW had sought evidence of hidden needs during the consultation process, but only one site had been mentioned. Due to this lack of evidence, we consider that there is no justification to use the higher regional estimate from the interim draft policy stage.

2.16 Several local authorities expressed doubts about the robustness of the pitch estimates implying that they should be lower, particularly where the GTAA results were expressed as a range. However our understanding is that the ranges used in the Lancashire sub-region and Cheshire sub-region at GTAAAs arose from uncertainty surrounding the future intentions of those potentially seeking to move to sites from bricks and mortar, and uncertainty concerning the accommodation needs of those staying on unauthorised encampments. While acknowledging some uncertainty of those interviewed in bricks and mortar, for the reasons given in para 2.19, we consider that this category of need is likely to have been underestimated overall, and hence we consider that the higher end of the range should be used on this score. The unauthorised encampment range is based upon various sources. The Department for Communities and Local Government (CLG) advice²⁶ is that those in unauthorised encampments are in housing need but some allowance has been made for those visiting who may have accommodation elsewhere. In the absence of any data to indicate that such other accommodation exists, it seems more reasonable to use the higher figures.

Panel assessment

2.17 We have looked in detail at the provisions of the individual GTAAAs which set out the needs arising in each of the sub-regions, and considered the cases made by individual participants and in representations to the submitted draft Policy. Overall we found that the GTAAAs are sound and provide a strong basis from which regional and sub-regional pitch requirements can be assessed. We have however 4 concerns which are explored below.

2.18 Our first concern regarding soundness of the GTAAAs relates to the difficulty in identifying the number of Gypsies and Travellers living in bricks and mortar which has proved impossible to estimate accurately in most of the sub-regions. As most of the GTAAAs themselves accept this means that the estimate of concealed households in bricks and mortar wishing to move onto a caravan pitch is likely to be underestimated.

²⁶ Cited in Lancashire Sub-Regional GTAA Final Report, p116, SHUSU and Pat Niner, May 2007 (RGT9)

- 2.19 Having reviewed the methods used to identify Gypsies and Travellers in bricks and mortar including information from the Travellers Education Service, and the proportion of interviews conducted in this sector, we conclude that there is the most likelihood of underestimation in:
- Lancashire sub-region, which says that numbers in bricks and mortar are unknown but potentially large, and where three authorities were unable to provide any estimates, and only 32 such households were interviewed;
 - Merseyside, where the total numbers in bricks and mortar was acknowledged to be an underestimate, and the estimate of the number of families wanting to move from a house to a site was based on a single interview; their figure of 5% was therefore based upon what appears to be informed guesswork; and
 - Cheshire sub-region, where the actual figure for those living in social housing is described as “potentially large” while there are no figures for those living in private housing, although the GTAA describes the figures for Congleton and St Helens as being “significant”. The bricks and mortar component was estimated to generate a need for between 11 and 36 pitches as 23% of those surveyed had been unsure as to their future intentions. It was, however, stated that this is likely to be an underestimate²⁷ so we do not consider it to be reasonable to use the lower figure.
- 2.20 By contrast we were impressed by the endeavours in the Greater Manchester GTAA to identify the overall Gypsy and Traveller population. The GTAA estimates that at least 90% of them live in bricks and mortar, and the largest proportion of the need for sites was assessed to come from this sector. In both the Cumbria and Ribble Valley GTAAs, a high percentage of those estimated to be in bricks and mortar were included in the interviews.
- 2.21 Our second reservation relates to difficulties in assessing needs from those on unauthorised encampments. Estimating this population in some of the sub-regional GTAAs relies on using figures derived from the bi-annual caravan count. At the Data Meeting²⁸ it was acknowledged that this is not especially robust and that CLG is reviewing the Count to make it more accurate and less onerous for local authorities.
- 2.22 The highest numbers on unauthorised encampments were recorded in Greater Manchester (82). It was clarified in debate that all these households (rounded up to 100) were assumed to be in need of transit accommodation²⁹. We do not consider this likely as the GTAA identified that 93%³⁰ of those living in unauthorised encampments have no fixed base; that is to say they are not working in the area or visiting the area with accommodation somewhere else to return to. However because not all the background information is published in the final report, it makes it difficult to interpret the precise results of this GTAA. Double counting of this element as both residential and transit was responsible in part for the uplift in the regional pitch estimate at the interim draft policy stage [para 2.4].
- 2.23 As detailed in Chapter 4 (Transit Provision), we are not convinced that the evidence shows that 100 transit pitches are required. Overestimating transit needs would have the effect of underestimating residential provision in Greater Manchester. We therefore recommend an increase in the regional pitch estimate to allow for half those on

²⁷ Cheshire Partnership GTAA, p115, SHUSU and Pat Niner, May 2007 (RGT6)

²⁸ Note of the Data Meeting, para 3.6, Jan 2010 (EiP11A)

²⁹ Email from AGMA, 4 March 2010 (PD18)

³⁰ Gypsy and Traveller Accommodation and Service Delivery Needs in Greater Manchester 2007/8, para 6.23, arc4, July 2008 (RGT7)

unauthorised encampments in Greater Manchester to be included in the permanent residential pitch requirements.

- 2.24 Smaller but still considerable numbers of Gypsies and Travellers were identified on unauthorised encampments in all the other sub-regional GTAA's, apart from Ribble Valley. In the Merseyside GTAA, while the estimated number of households on unauthorised encampments is significant (22-27) only 2 were interviewed so no reliable figures for household formation were advanced.
- 2.25 A third concern relates to the way in which deductions have been made in 2 of the sub-regional GTAA's for pitch turnover, i.e. churn. This was used in the Cheshire Partnership (15 pitches) and Merseyside (10 pitches³¹) GTAA's. The use of pitch turnover as a contributor to pitch supply seems to us to be unreliable. In the illustration at paragraph 96 of the GTAA Guidance³² the supply side includes the number of existing pitches expected to become vacant in near future. However, the regional GTAA³³, at paragraph 5.2.1 says that there is evidence to suggest that many of those who have chosen to leave local authority sites remain within the local authority, sub-regional or regional boundary. Families moving from local authority sites do not, therefore, automatically result in an increase in the supply of pitches. We have taken account of advice in the Benchmarking Guidance³⁴ which says, under the heading "supply of pitches", that in benchmarking GTAA's one of the most important elements to check is pitch turnover. This is clarified under Q11 (p35) which says that supply can come from any pitches vacated by people moving to housing, moving out of the area, or vacated in other ways such as the death of a sole occupier. It seems clear to us that any supply derived in this way would have to relate to known personal circumstances. We do not accept Halton BC's contention that 10 pitches should be subtracted from its total requirement to make allowance for vacancies as there is no supporting evidence concerning the personal circumstances of those vacating the sites which would demonstrate that they have not sought or occupied other sites within the region. Our conclusion is that due to the evidence set out in the regional GTAA, and where there is no evidence to suggest that vacancies have resulted in any increase in overall supply, pitch turnover cannot reasonably be used as a contributor to pitch supply. We recommend that pitch turnover be deleted from the pitch supply and that to compensate there needs to be an increase of 25 pitches in the overall regional requirement.
- 2.26 Our final concern is a matter of detail. Blackburn with Darwen BC were the only participant to challenge the robustness of the sub-regional GTAA. In this case for the Lancashire sub-region. We consider that it is unfortunate that the concerns of this Council were raised at such a late stage in the process. However there are 2 elements in their case³⁵ that we accept:
- the estimate of unauthorised developments included in the GTAA for this authority appears to relate to caravans having been taken from the Caravan Count (14). We accept that it would be appropriate to convert this to households by applying a commonly used ratio³⁶;

³¹ Although expressed as an allowance for vacancies, it was estimated on the basis of an average of 1 pitch being relet each year on each site (2 x 5 = 10), Merseyside GTAA, p102, SHUSU, Feb 2008 (RGT4)

³² Gypsy and Traveller Accommodation Needs Assessments: Guidance, p24, CLG, Oct 2007 (GT6)

³³ NW Regional GTAA Final Report, p129, SHUSU and Pat Niner, May 2007 (RGT2)

³⁴ Preparing RSS reviews on Gypsies and Travellers by RPBs, p27, CLG and Universities of Birmingham, Salford and Sheffield Hallam, March 2007 (GT4)

³⁵ Blackburn with Darwen BC note submitted for the Data Meeting, 19 Jan 2010 (DM25),

³⁶ 1.7 caravans per household

- the estimate for household formation (22) appears not to have taken any account of the likelihood of some youngsters marrying from within other local Gypsy and Traveller households. We also accept the case for a marginal adjustment here, which together with the first element would give a reduced need of 10 pitches for this authority area.

2.27 We give little weight to the updated figures concerning the waiting list in Blackburn with Darwen as all the GTAAs use the 2007 baseline figures. More recent figures would need to be held back for subsequent GTAA reviews. In any case the removal of those from out of the Borough and those whose address is unknown is unreasonable without evidence as to any possible need the families concerned may have to live in the Borough. We also give little weight to their concerns about the proportion of the regional pitch requirement that is proposed for Lancashire, as the draft Policy figure is the same as the top of the range figure set out in the Lancashire GTAA.

Conclusions

- 2.28 Taking account of the above concerns has a relatively modest effect on the regional pitch total, especially as the largest adjustment is purely a net transfer from the transit category. We therefore recommend an increase in the total number of residential pitches required for the period 2007-2016 from 825 to 890.
- 2.29 Nevertheless, as the GTAAs themselves do, we accept that the needs identified in the sub-regional GTAAs produce only a minimum pitch figure. Hence in our opinion there is no justification for going below the upper end of the range produced by summing the needs assessments from each of the sub-regional GTAAs.

Recommendation 2.2

Revise the permanent residential pitch requirement for the region such that it becomes at least 890 instead of 825 over the 2007-2016 period by:

- adding 50 to allow for those on unauthorised encampments seeking permanent residential pitches (Greater Manchester) [para 2.23];
- adding 25 to avoid any deduction for pitch turnover (Merseyside and Cheshire sub-regions) [para 2.25]; and
- subtracting 10 to allow for a seeming overestimate of households on unauthorised encampments and through new household formation (Blackburn with Darwen element of the Lancashire sub-region) [para 2.26].

CLARITY OF SHORTER TERM NEEDS FOR GYPSIES AND TRAVELLERS

2.30 Draft Policy L6 purports to address the backlog of need that was identified in the GTAAs that were carried out in 2007 and 2008. One of the main intentions of Circular 01/2006 is “to increase the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years”³⁷. The Circular was published in February 2006 so the 5-year period ends in February 2011. As draft Policy L6 indicates a single figure for additional residential pitches over a 9-year period (2007-2016), it is clear that it will not meet this particular intention of the Circular.

³⁷ Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites, para 12(c), ODPM, Feb 2006 (GT2)

- 2.31 GONW suggested³⁸ that most local authorities are awaiting the finalisation of figures in the Partial Review before making appropriate provision. However, GONW considered that this does not sufficiently prioritise the need to address the existing backlog of site provision and that it might suggest to local authorities that they could delay provision, thereby not addressing the need for increased provision in the immediate future. GONW suggested the inclusion of a two-stage process for site delivery, for example with one stage (2007-2012) ensuring clear requirements are set and allowing for more effective monitoring of progress, and with a second stage leading up to 2016.
- 2.32 We consider that in principle this is a good suggestion as it would demonstrate the high priority that should be given to site provision, would enable progress to be monitored, and would demonstrate to the travelling community that their engagement with the system was paying visible dividends. However, there are significant practical problems with this approach. In particular, the anticipated timescale for site identification and the adoption of Development Plan Documents (DPDs) is too long to enable a 2012 target to be met. Even under the transitional arrangements³⁹, the time taken for site identification, granting planning permission, and carrying out the development is such that any interim target would be highly unlikely to be met. Failure to meet such targets could be demoralising for those involved in the process and be counter-productive in terms of site delivery.
- 2.33 We have also taken into account the potential unintended consequences of interim targets as identified by 4NW. Although separated out in 4NW's initial pitch figures⁴⁰, interim targets have not formed part of the formal consultation process or been considered by the Sustainability Appraisal (SA). No figures have been advanced and as a result any phasing could be subject to legal challenge, resulting in greater delays. Although we would welcome early delivery of pitches due to the identified backlog, we share the concerns of 4NW. In these circumstances we recommend that no interim targets are included in the Policy.
- 2.34 Nevertheless we consider that a greater sense of urgency could be incorporated into paragraph 3 of the supporting text. It would be difficult to include any quantification of this, since the backlog element is not defined and in respect of Greater Manchester the GTAA needs relating to the first 5-year period are not differentiated. Nevertheless as already noted, it is clear that a sizeable proportion of accommodation needs comes from concealed and doubled up households [para 2.13]. We therefore recommend a strengthening of the supporting text which should indicate the urgent need to plan and deliver suitable accommodation to meet the backlog in accordance with Government objectives in Circular 01/2006 [see also para 5.14].

Recommendation 2.3

Strengthen the supporting text to give a greater sense of urgency in meeting the backlog of accommodation needs [para 2.34].

³⁸ GONW Matter 2 statement

³⁹ Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites, paras 41-46, ODPM Feb 2006 (GT2)

⁴⁰ Draft Pitch Distribution for the accommodation of Gypsies and Travellers policy – web forum, 4NW, Nov 2008 (PRE18)

SCALE OF PROVISION BEYOND 2016

3% compound assumption

- 2.35 The draft Policy states that beyond 2016 provision will be made across the region for an annual 3% compound increase in the level of overall residential provision, equivalent to at least 295 additional pitches between 2016 and 2021. Due to the changes in the base data [para 3.23], 4NW recommended that this figure of 295 be reduced to 286⁴¹.
- 2.36 There was some concern about the lack of a specific end date, with Local Development Frameworks (LDFs) likely to continue until at least 2026. However, Policy L4 of the North West Plan (Regional Housing Provision) and its supporting Table 7.1, says that the housing provision will continue until 2021. It also says that local planning authorities should assume that the average annual housing requirement will continue for a limited period beyond 2021.
- 2.37 Several local authorities and Parish Council participants objected to the use of a long-term growth rate as high as 3% per annum. A 3% assumption was however used in all but one of the GTAAs to estimate needs from 2012-2016⁴². Such an assumption is also consistent with the GTAA Guidance⁴³ which advises that where local data does not provide a clear picture of the rate of household formation, the national average ranges between 3 and 4% should be used. It advises that while for Gypsies and Travellers it will probably not be realistic to try and forecast need for up to 15 years ahead, the most accurate projections possible covering the next 5-10 years should be made. Recent Government advice on RSS reviews⁴⁴ confirms that at present the best assumption to be made for the period when the current backlog has been cleared (i.e. beyond 2016) is an annual household growth rate of 3% compound.
- 2.38 Other ways of calculating future needs were advanced by participants. Association of Greater Manchester Authorities (AGMA) suggested a phased approach whereby the backlog and current needs are reflected in the Policy but beyond 2016 the regional policy would be reviewed to take account of 2013 GTAA updates. While this would have the benefit of being more up to date after 2013 (subject to it being done on a co-ordinated basis [see paras 8.27-8.28]), it seems to us that there is a danger that districts would be less inclined to make early preparation for future provision if there was no certainty that they would be required to provide it. We do not see any real risk of local authorities over-allocating land by using the longer term growth rate. But in the event that any future regional policy required a lower annual provision for a particular authority, any land allocated by then would merely last longer. Blackburn with Darwen BC agreed that there is a need for RSS to continue to provide guidance beyond 2016 but suggested that the additional annual pitch requirement for the period 2007-2016 be applied beyond 2016. However, this would result in significantly more additional provision than 3% and this greater provision has not been justified.
- 2.39 The draft Policy requires a co-ordinated review of sub-regional GTAAs in 2013 but until these are produced there is no evidence to support any other growth rate. We consider that in the interim the 3% compound growth rate should be applied. We

⁴¹ 4NW Matter 4 statement

⁴² Sources given in footnote 6 of the supporting text to draft Policy L6

⁴³ Gypsy and Traveller Accommodation Needs Assessments, Guidance, para 93, CLG, Oct 2007 (GT6)

⁴⁴ Preparing RSS Reviews on Gypsies and Travellers by RPBs, p 42, CLG and Universities of Birmingham, Salford and Sheffield Hallam, March 2007 (GT4)

support the inclusion of a regional pitch estimate for the 2016-2021 period as this would provide consistency with housing supply figures in the North West Plan.

Policy adjustments

- 2.40 There was some inconsistency in how participants interpreted the proposed compound increase and for the sake of clarity we consider that it should be fully explained. We therefore recommend amendments to the third paragraph of draft Policy L6 together with an explanatory footnote as shown in Appendix A.
- 2.41 Table 7.2 needs to be adjusted to reflect the revised 2007 baseline figures [see paras 3.22 and 3.23] and the revised 2007-2016 requirement figures [R2.2]. The 3% compound increase would need to be applied to the revised regional total of 1,860 to give a requirement for the period 2016 to 2021 of at least 296 pitches⁴⁵.
- 2.42 We recognise the need to ensure a continuing provision of pitches beyond 2016. While there is undoubtedly some uncertainty surrounding the precise numbers, draft Policy L6 makes provision for a co-ordinated review of GTAAs *in* 2013. We consider that this is too restrictive and could inhibit sub-regions from commencing reviews before 2013. We consider that the wording should be amended to accord with that in draft Policy L7 which requires the reviews to be undertaken *by* 2013, as agreed by 4NW.

Recommendation 2.4

In draft Policy L6, 3rd paragraph sentences 1 and 2, clarify the intended method of taking forward pitch requirements beyond 2016 using the same district distribution as 2007-2016 [para 2.40].

Recommendation 2.5

In draft Policy L6, 3rd paragraph sentence 1, revise the residential pitch provision for the 2016-2021 period to read at least 296 additional pitches to reflect revisions to the baseline figures and to the 2007-2016 requirement [para 2.41].

Recommendation 2.6

Amend draft Policy L6, 3rd paragraph sentence 3 to require a co-ordinated review of GTAAs "*by*" 2013 and not "*in*" 2013 [para 2.42].

⁴⁵ $(970 + 890) \times 1.15927 = 2156$; $2156 - 1860 = 296$

3 DISTRIBUTION OF GYPSY AND TRAVELLER RESIDENTIAL PITCH PROVISION

Matters 2.4, 4.2 & 4.3

This chapter examines the distribution of Gypsy and Traveller pitches throughout the Region. It looks at the adequacy of the three options considered by 4NW and then at the basis for a wider distribution. The chapter looks at the proposed provision at a sub-regional level, and then at a district level, before making some recommendations for minor adjustments to the district requirements set out in draft Policy L6 and the accompanying Table 7.2.

ADEQUACY OF OPTIONS CONSIDERED FOR GYPSY AND TRAVELLER ACCOMMODATION

- 3.1 All the sub-regional GTAAs were carried out on a “need where need arises” basis, while emphasising that the identified needs did not mean they should be met in those specific localities. However background work in the Greater Manchester GTAA included some work on the geographical preferences of their resident Gypsies and Travellers, and this went one stage further than the other GTAAs in seeking to redistribute the required pitches between its constituent authorities⁴⁶.
- 3.2 At the issues and options stage in spring 2008, 4NW defined 3 alternative ways of distributing the additional pitches required for Gypsies and Travellers up to 2016 to individual unitary and district⁴⁷ authorities⁴⁸:
- Option 1 used the local needs estimates directly from the sub-regional partnership GTAAs;
 - Option 2 modified the GTAA-based needs to provide a minimum level of pitches in each district; and
 - Option 3 involved working with sub-regional partnerships and Gypsy and Traveller communities to agree a more balanced share of meeting needs across districts.
- 3.3 The consultation response on these options was overwhelmingly in favour of Option 3⁴⁹, although some such as Merseyside Policy Unit appeared to favour a balance between Options 2 and 3. The first point at which Option 3 was quantified in terms of distributing additional pitches to individual districts was in November 2008. This initial draft distribution was used by 4NW officers as the basis for a web-based forum open to local authorities and statutory bodies, and was discussed at a meeting in December 2008 with representatives of Gypsies and Travellers⁵⁰.
- 3.4 4NW's officer distribution was similar to the GTAA-based needs estimates except in the Lancashire sub-region which was more balanced between districts. In seeking to take account of the location of unauthorised encampments, the regional total appears to have double counted an allowance for transit provision, particularly in Greater Manchester.
- 3.5 We agree that there was merit in 4NW's approach to the consultation on distribution options. It allowed it to seek views on the principle of providing a wider distribution of

⁴⁶ as clarified in debate and a follow-up note PD19

⁴⁷ We use “districts” generically from now on in this report in discussing distribution of accommodation requirements for consistency with Table 7.2 (and Table 7.3)

⁴⁸ Gypsies and Travellers Options Paper, CAG Consultants for the NWRA, June 2008 (PRE26)

⁴⁹ 50 responses in agreement out of 81 responses, and a majority of participants in favour at 3 general workshops held, CAG report on the consultation on draft options, p9 and section 3.1, July 2008 (PRE24)

⁵⁰ CAG report on the consultation forum on draft policies, Jan 2009 (PRE13)

accommodation choices available to Gypsies and Travellers, without getting bogged down in the precise apportionment to individual districts. Although the web-based forum provided an opportunity for targeted feedback on an initial distribution, it raised suspicions in the minds of some more locally based representatives of the settled community that they had been excluded.

- 3.6 An opportunity for formal consultation was provided at the interim draft policy stage. However any comments on the proposed distribution between districts was in part swamped by the adverse reaction from local authorities and the settled community to the uplift of the regional pitch total [para 2.4].
- 3.7 Differentiating between the impacts of Options 2 and 3 appears to have challenged the Sustainability Appraisal consultants whose analysis focused on comparing Options 1 and 3 with only one paragraph devoted to Option 2⁵¹. Nevertheless we accept that a clear preference for Option 3 emerged as the basis for taking forward the work.

BASIS FOR A WIDER DISTRIBUTION APPROACH FOR GYPSIES AND TRAVELLERS

- 3.8 We agree that there is a strong case for a wider range of locations to be available for Gypsy and Traveller pitches throughout the region. 60% of all pitch provision at 2007 was provided by just 7 authorities⁵² albeit spread throughout the region, and Table 7.2 indicates that 14 local authorities (about 35% of the total) had no authorised provision either on public or privately owned sites. On the basis of this imbalance, we consider that it was correct to use the GTAA-based distribution as only a starting point rather than ‘the answer’. FFT and other Gypsy and Traveller spokespersons confirmed that current residential location tends to reflect historic work patterns and lack of opportunity often related to local authority attitudes, particularly their approach to enforcement. Hence those local authorities who have made responsible efforts to provide sites may have attracted other Gypsies and Travellers wanting to establish a permanent base.
- 3.9 In taking a strategic view of the GTAA-based distribution, 4NW has followed the question and answer approach recommended in national guidance⁵³. The main driver appears to have been to increase equity and choice, and in doing so improve access to services, by spreading new pitch provision to include almost all districts where there is no current provision. Most participants considered that Gypsy and Traveller preferences in this regard had been adequately taken into account. Gypsy and Traveller spokespersons considered that there would be a willingness to move, although FFT considered that shorter distance moves would be more acceptable so as to retain kinship networks. We note that Table 7.2 reflects these wishes in that most redistribution proposed is from the areas of highest existing provision into the immediately surrounding districts.
- 3.10 We are largely satisfied that 4NW has struck the right balance between redistribution and providing for local needs, although we have reservations about the artificial constraint of rounding to at least 10 pitches [para 3.26].

⁵¹ Sustainability Appraisal Report – Issues & Options, pages 19-21 (the options are labelled A, B and C in the SA documents), Scott Wilson and Ben Cave Associates for the NWRA, June 2008 (PRE29)

⁵² Hyndburn BC Matter 4 statement

⁵³ Preparing RSS Reviews on Gypsies and Travellers by RPBs, pp47-56, CLG and Universities of Birmingham, Salford and Sheffield Hallam, March 2007 (GT4)

- 3.11 To our mind a wider distribution also has the potential to enhance delivery, subject to liaison between local authorities and engagement with Gypsy and Traveller representatives where there is no existing population [paras 7.18-7.19].
- 3.12 Employment and transport considerations do not appear to have had a major influence on the proposed distribution. Some local authorities used the relatively small size of their economic base or relative lack of motorway or public transport connections as an argument for seeking a lower pitch provision. We do not rate these arguments however, since work opportunities for Gypsies and Travellers largely relate to the existence of the settled community which is present in at least one sizeable settlement or market town in all districts. The road network is relatively good throughout the region. Some districts on the eastern side may be accessible to sources of work in adjoining regions. Superficially we accept the logic of making a reduced provision in more isolated coastal districts, unless there are expansion needs from locally based Gypsy and Traveller communities [para 3.27-3.28]
- 3.13 We support the view taken by 4NW that local environmental factors and other constraints, albeit important in decisions on site allocations at the local level, should not have a significant influence over the distribution of new plots at a regional scale. This is because of the small scale of land required (only some 22 ha required to accommodate the total regional figure for additional residential and transit pitches between 2007-2016). 4NW rightly, in our view, draw attention to the difference in challenge between finding land for 122 pitches per year⁵⁴ for Gypsies and Travellers and land for over 23,100 new dwellings on average per year⁵⁵. The only circumstance where land availability should be seen as a constraint, in our opinion, is where the edge of the urban area is tight against a local authority's boundary [para 3.32].
- 3.14 We agree with 4NW that other factors identified in the national guidance, such as social inclusion and flexibility, are most relevant in making site allocations at the local level.
- 3.15 Pendle BC argued that consistency with the spatial principles of the North West Plan should have influenced the pitch distribution to a greater extent than it appears to have done. Although we accept that Policy RDF1 on spatial priorities should guide all new mainstream development, there are special considerations in planning for Gypsy and Traveller accommodation that make it difficult to fit strictly within an urban hierarchy of this kind⁵⁶.
- 3.16 Hyndburn BC⁵⁷ suggested that the explanation of reallocating from a needs where needs arise basis currently in footnote 4 should be included in the supporting text itself. We do not however consider this to be compatible with our aim of making the final supporting text as succinct as possible. Once the allocation of new pitches to individual parts of the region has been finalised, it is not necessary for the text to contain the detailed justification of their derivation.
- 3.17 We do not accept claims by some parties of insufficient transparency in 4NW's method for redistributing Gypsy and Traveller pitches. We accept that a formulaic approach would not have been appropriate. To our mind, the case made by 4NW for a strategic view of the distribution of new pitches is soundly based on evidence and has been

⁵⁴ Technical Background Paper – Gypsies & Traveller and Travelling Showpeople Pitch Provision, pp27 and 30, 4NW, July 2009 (PR7)

⁵⁵ North West of England Plan RSS to 2021, Policy L4, Table 7.1, GONW and CLG, Sept 2008 (RSS1)

⁵⁶ Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites, paras 54 and 64, ODPM, Feb 2006 (GT2)

⁵⁷ Representation 11

documented clearly⁵⁸. The issue for us is whether the detailed results of the wider distribution are appropriate at sub-regional and district level.

PROPOSED SUB-REGIONAL PROVISION FOR GYPSIES AND TRAVELLERS

3.18 The figures for the proposed future sub-regional residential pitch provision as set out in Table 7.2 accompanying draft Policy L6 are, with one exception, taken almost directly from the GTAAs. Where ranges of pitch provision have been included in GTAAs the higher figure has been used. The one exception is Greater Manchester, where the GTAA does not differentiate between residential and transit pitches, and where Table 7.2 allows for 100 transit pitches. The Table 7.2 figures for each district have been rounded to multiples of 5 with the result that the overall totals vary slightly from the figures in the GTAAs, as set out below:

Sub-region	GTAA total	Table 7.2 total
Cumbria	72	75
Lancashire sub-region – including Ribble Valley	212-234	230
Greater Manchester	281 (excluding assumed transit pitches)	280
Merseyside	45	50
Cheshire sub-region	151-193	190

- 3.19 We have already given our reasons for accepting that the upper end of the GTAA range should be used as the basis of provision figures in both the Lancashire and Cheshire sub-regions [paras 2.16].
- 3.20 One of the reasons that the sub-regional requirements in the draft Policy broadly accord with the GTAAs is that they do not involve any element of redistribution. Indeed, all the redistribution that is proposed falls within, rather than between, the sub-regions. This flows from the objective in Option 3 of working with sub-regional partnerships to agree a more balanced a share of meeting needs across districts [para 3.2]. At the EiP debates FFT argued that some Gypsies and Travellers would be reluctant to leave their home areas. They emphasised the need to retain kinship ties which could be severed if long distance redistribution was intended.
- 3.21 We accept that there is no evidence to substantiate any need for redistribution of provision between the sub-regions at this stage, although we would not preclude some redistribution after the next round of GTAAs. We agree that, subject to the relatively minor revisions implied by R2.2, the sub-regional provision should remain in accordance with that identified in the sub-regional GTAAs.

⁵⁸ Technical Background Paper – Gypsies & Travellers and Travelling Showpeople Pitch Provision, Appendix 5, 4NW, July 2009 (PR7)

PROPOSED DISTRICT LEVEL PROVISION FOR GYPSIES AND TRAVELLERS

Baseline figures

3.22 Some of the figures in Table 7.2 for current authorised provision in 2007 were challenged in representations and so we asked 4NW to provide updated figures based upon the latest information supplied by local authorities. This paper⁵⁹ amended the baseline figures for the following districts:

- Cheshire East reduced from 101 to 95
- Cheshire West & Chester reduced from 68 to 55
- Warrington reduced from 25 to 20
- St Helens reduced from 70 to 50
- Hyndburn reduced from 104 to 86
- Fylde reduced from 2 to 0
- Lancaster increased from 142 to 158
- West Lancashire reduced from 8 to 0

3.23 We tested the basis of these changes at the Data Meeting in the context of baseline data from the Salford Housing & Urban Studies Unit collected at the time of the regional GTAA, and data from the Caravan Count on the number of pitches on sites managed by local authorities or Registered Social Landlords (RSL). We are satisfied that these changes reflect the best available information. The result of accepting them is to reduce the overall total of existing provision (2007) from 1,026 to 970 pitches, and we recommend accordingly. This has knock-on effects for the calculation of longer-term requirements [para 2.41].

Recommendation 3.1

Amend Table 7.2 to include revised figures for current authorised provision in 2007 in 8 specified districts [para 3.22].

Redistribution to districts

3.24 The district level provision was the issue which attracted the highest level of objection in representations at the submitted draft stage. We test these challenges below, and also indicate how we think the net effect of our recommended increase to the regional total should be allocated [R2.2]. Our conclusions are reached within the context that we have already supported the principle of a more equitable distribution of pitches between districts which would provide greater choice for Gypsies and Travellers and greater fairness for those districts which currently make provision [paras 3.8-3.17].

3.25 Despite the objective to seek a more balanced distribution of additional Gypsy and Traveller pitches, the district figures in Table 7.2 are for the most part closely related to the GTAA-based needs assessments. This is apparent from the map helpfully provided

⁵⁹ Current Authorised Provision (Gypsy and Traveller Pitches) in 2007 revised version , 4NW, 25 Jan 2010 (DM23)

by GONW⁶⁰. The extent of proposed redistribution involves a transfer of requirements from 3 authorities with high levels of existing pitches (Hyndburn, Blackburn with Darwen and Blackpool) to adjoining local authorities within the Lancashire sub-region. There has been a minor redistribution in Cumbria away from the coastal districts of Copeland and Barrow-in-Furness. A minor redistribution between authorities also took place within the Greater Manchester area before the GTAA was published, such that all constituent local authorities are expected to make some future provision. Despite the recognition that local authority boundaries often form artificial dividing lines around areas which have high numbers of pitches e.g. Middlewich in Cheshire East⁶¹, there is no redistribution to adjoining authorities on this score in Table 7.2.

Cumbria

- 3.26 Cumbria CC expressed a strong preference for retaining the needs figures for individual districts from its GTAA. We have reservations about 4NW's method of rebalancing district figures such that the minimum district figure is 10. In our view this ignores the fact that some new sites could be very small, indeed this may be a preference for some English Romany Gypsies. For this reason, and because we have accepted the soundness of this GTAA in our analysis in Chapter 2, we suggest the following changes.
- 3.27 In Copeland the Home Space Sustainable Accommodation Community Interest Company (CIC) commented⁶² that the GTAA identified the requirement for at least one pitch but the lack of any allocation would mean that should this family have a need for further pitches in the future it might have to relocate out of the district. Throughout the whole region, all the district level allocations have been rounded to multiples of 5. We have seen no evidence to support this approach and are concerned that it may result in unnecessary movement of Gypsies and Travellers between districts. We recommend that additional pitches are provided in Copeland and suggest a requirement of 2 pitches.
- 3.28 The GTAA identifies the need for 6 pitches in Barrow-in-Furness by 2016 but this has been redistributed to South Lakeland and Eden in Table 7.2. While 4NW's Technical Background Paper⁶³ identifies that there are vacancies in Barrow, no vacancies were identified at the time of the Cumbria GTAA. We have no way of knowing whether this may be due to management issues, and if so whether they are temporary or not. But in any event it seems reasonable to provide some expansion space for the existing Gypsies and Travellers resident in that district (17 authorised pitches in 2007). We therefore consider it would be more appropriate for Table 7.2 to reflect the GTAA findings. Although this is a small district, with parts in Flood Zone 3 and within a RAMSAR site, the requirement of 6 pitches is very modest and could easily be accommodated. We recommend a consequential change to South Lakeland and Eden so that these districts also reflect the GTAA findings.
- 3.29 The proposed requirement for Allerdale exceeds the need identified in the GTAA by 3 pitches. While we consider that there is scope for some additional residential pitch provision in Allerdale we consider that a requirement nearer to the GTAA figure is appropriate given its peripheral location, and recommend that the requirement be reduced by one pitch. We fully agree with the proposed requirement for Carlisle which reflects the GTAA findings.

⁶⁰ Map 2, Distribution of Gypsy and Traveller Pitch Provision attached to GONW Matter 4 statement

⁶¹ Technical Background Paper – Gypsies & Travellers and Travelling Showpeople Pitch Provision, p11, 4NW, July 2009 (PR7)

⁶² Representation 17

⁶³ Technical Background Paper – Gypsies & Travellers and Travelling Showpeople Pitch Provision, p28, 4NW, July 2009 (PR7)

- 3.30 No pitches are required to be provided in the Lake District National Park; the GTAA does not identify any need. While we accept this is currently the case, and we recognise that pitches are proposed in all the surrounding districts, we do not consider that this necessarily need be the case in the longer term.

Recommendation 3.2

Increase the residential pitch requirement 2007-2016 for Copeland from 0 to 2 [para 3.27].

Recommendation 3.3

Increase the residential pitch requirement 2007-2016 for Barrow-in-Furness from 0 to 6 [para 3.28].

Recommendation 3.4

Decrease the residential pitch requirement 2007-2016 for South Lakeland from 10 to 5 [para 3.28].

Recommendation 3.5

Decrease the residential pitch requirement 2007-2016 for Eden from 15 to 13 [para 3.28].

Recommendation 3.6

Decrease the residential pitch requirement 2007-2016 for Allerdale from 15 to 14 [para 3.29].

Lancashire sub-region and Ribble Valley

- 3.31 The effect of redistributing some additional pitches away from 3 districts which already make high levels of provision [para 3.25] is to increase those for Fylde and Wyre; Chorley and South Ribble; Pendle, Rossendale and Burnley.
- 3.32 Fylde BC and Wyre BC both objected to the principle of a wider distribution. However given the low level of current provision in Fylde and complete lack in Wyre, we think it not unreasonable for them to make a future provision of 15 pitches each, given that neighbouring Blackpool is built up tight to its boundary. Blackpool already provides 51 residential pitches, making it one of the largest providers in the region. In its representations, the Council pointed out that it is unable to meet its employment or housing land requirements within its own local authority area.
- 3.33 We have considered the case made by the Central Lancashire Authorities of Preston, South Ribble and Chorley on the grounds that there has been too much redistribution, and that the Lancashire sub-region is expected to take a disproportionate share of the regional need. Of these only Preston has existing authorised pitches, and its requirement figure matches the GTAA findings. As there were no authorised pitches in South Ribble or Chorley in 2007, and the GTAs were carried out on a need where need arises basis, it is unsurprising that there was no need identified. Objections were made partly on the basis of lack of pre-application enquiries – we counter this argument

in greater detail in para 6.23. Overall we do not consider that a requirement of 10 pitches each for South Ribble and Chorley is unreasonable given their good accessibility and their proximity to Blackburn with Darwen. We support the principle of requiring relatively short distance moves for Gypsies and Travellers to obtain pitches where redistribution is proposed [para 3.9].

- 3.34 Blackburn with Darwen had the highest GTAA-based needs figure in the region and we support some transfer to surrounding districts. We have already accepted some but not all of this Council's claims that the GTAA overstated these needs in respect of the allowances for unauthorised developments and new household formation [para 2.26], and have recommended a reduction in its 2007-2016 requirement figure. We do not consider that Blackburn with Darwen BC has a case for any further reductions on the grounds that insufficient account has been taken of land availability and employment opportunities. The Examination heard that employment opportunities are linked to the location of the settled population in urban areas such as Blackburn. Although a search for council owned land had apparently failed to find a potential site, we consider that there must be other options, such as those set out in Circular 01/2006⁶⁴ and those explored in debate, that should be considered. On this basis we recommend that the requirement for Blackburn with Darwen should be reduced from 45 to 35 pitches.
- 3.35 Both Pendle BC and Burnley BC queried the scale of their requirements on the basis that there is no evidence of a demand to live there from Gypsies and Travellers. The GTAA identified a need for 2 pitches in Pendle and 5-7 pitches in Burnley but these have been translated into a requirement for 15 pitches in each district in the draft Policy. Rossendale BC also queried the strength of evidence for their apportionment of 10 pitches. We consider that all these provision figures are fair in the interests of producing a more balanced share of meeting need across districts. In particular, we note that Hyndburn, which currently provides 86 pitches (Pendle, Burnley and Rossendale have none) had a GTAA need where it arises requirement for 30-33 pitches. We consider that it is reasonable for some of the provision to meet this need to be redistributed to nearby districts which currently make no pitch provision.

Recommendation 3.7

Decrease the residential pitch requirement 2007-2016 for Blackburn with Darwen from 45 to 35 pitches [para 3.34].

Greater Manchester

- 3.36 We welcome the redistribution within Greater Manchester based upon the geographical preferences⁶⁵ of the Gypsies and Travellers themselves, including those in bricks and mortar. We have already acknowledged the efforts made to reach this latter sector and take account of their views [para 2.20]. This means that Oldham, Tameside and Stockport with no authorised pitches at 2007 are now required to make provision in the 2007-2016 period. The preferences expressed in the GTAA however did not result in any redistribution outside Greater Manchester, although it is not obvious whether interviewees were given the chance to express such an opinion.
- 3.37 Despite Table 7.2 reflecting its GTAA results exactly, AGMA expressed concerns in debate that the ability of authorities to accommodate these pitch levels had not been

⁶⁴ Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites, para 35, CLG, 2006 (GT2)

⁶⁵ Gypsy and Traveller Accommodation and Service Delivery Needs in Greater Manchester 2007/8, para 6.15, arc4, July 2008, (RGT7)

taken adequately into account. This view was expressed most strongly by Bury Council and in particular its concerns about the difficulty in providing the required number of pitches due to landscape and other constraints. A substantial part of the authority area is designated as a Special Landscape Area, the urban area is surrounded by Green Belt and there are areas of risk from flooding. The Council has also referred to its difficulty in relocating an existing site (Fernhill) of 17 pitches and the findings of its Strategic Housing Land Availability Assessment (SHLAA) that the Borough would struggle to find sufficient appropriate sites.

- 3.38 However, Circular 01/2006 makes it clear that local landscape designations should not be used in themselves to refuse planning permission⁶⁶. We are also concerned that the trawl through sites identified in the SHLAA limited the search to sites of at least 0.3ha in size based upon the observation in the Technical Background Paper⁶⁷ that the optimum size for sites is around 10 pitches. We have taken account of advice in the Good Practice Guide⁶⁸ which states that sites of 3-4 pitches can also be successful, particularly where designed for one extended family.
- 3.39 In view of these considerations we do not accept that Bury, nor any other part of Greater Manchester, is so constrained that it does not have the capacity to provide additional pitches for Gypsies and Travellers.
- 3.40 Our reasoning for increasing Greater Manchester's requirement for residential pitches as opposed to transit pitches is given in paras 2.22-2.23. In order to maintain the spread of pitches as set out in the GTAA, we recommend an even distribution of this transfer between categories across all 10 authority areas.

Recommendation 3.8

Increase the residential pitch requirement 2007-2016 for each local authority in Greater Manchester by 5 pitches with a corresponding decrease in transit pitches in each authority [para 3.40].

Merseyside

- 3.41 The Merseyside Policy Unit queried⁶⁹ the strength of evidence on which the proposed requirement figures had been based. In fact the figures for the 4 individual authorities in the GTAA sub-regional partnership area almost exactly match the GTAA findings, with the exception of a small increase for Knowsley. The Policy Unit's comments relate more to the figures for St Helens and Halton, which for GTAA purposes were included in the Cheshire sub-region.
- 3.42 Wirral BC objected to the requirement to provide 10 pitches on the basis that it is a peninsula and not a traditional location for Gypsies and Travellers. The Caravan Count had been nil for the past 10 years and the scale of unauthorised encampments suggested that any provision would be rarely used. However, the Merseyside GTAA says that the number of Gypsies and Travellers in bricks and mortar is unknown but potentially large. The likelihood of hidden households, keeping a low profile, was also raised by Heine Planning in debate. About 20% of those in housing who were interviewed lived in

⁶⁶ Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites, para 53, ODPM, Feb 2006 (GT2)

⁶⁷ Technical Background Paper - Gypsies & Travellers and Travelling Showpeople Pitch Provision, 4NW July 2009 (PR7)

⁶⁸ Designing Gypsy and Traveller Sites: Good Practice Guide, para 4.7, CLG, May 2008 (GT10)

⁶⁹ Representation 65

Wirral. The GTAA identified a need for 10 residential pitches by 2016 and this has been carried forward in the draft Policy.

- 3.43 We therefore support the district distribution in Table 7.2. However we must also apportion the additional need for 10 pitches arising from what we have argued to be an inappropriate deduction for pitch turnover in the GTAA [para 2.25].
- 3.44 The current authorised provision in this sub-region shows a significant discrepancy in provision with 2 of the 4 authorities making no provision at all. The GTAA acknowledges that the figures for unauthorised encampments are not complete with differing practices between the authorities; for example Wirral BC only logs those on Council owned land whereas Liverpool City Council logs all known encampments. We therefore consider that the additional 10 pitches should be evenly distributed over the sub-region, with 3 pitches being provided in the 2 authorities with least current provision (Knowsley and Wirral), and 2 pitches in the other authorities (Sefton and Liverpool).

Recommendation 3.9

Increase the residential pitch requirement 2007-2016 for Knowsley from 10 to 13 pitches [para 3.44].

Recommendation 3.10

Increase the residential pitch requirement 2007-2016 for Wirral from 10 to 13 pitches [para 3.44].

Recommendation 3.11

Increase the residential pitch requirement 2007-2016 for Sefton from 15 to 17 pitches [para 3.44].

Recommendation 3.12

Increase the residential pitch requirement 2007-2016 for Liverpool from 15 to 17 pitches [para 3.44].

Cheshire sub-region

- 3.45 There were a number of objections to the pitch provision requirements raised by Parish Councils. Mollington PC wanted the interests of the settled community to be taken into account, and in particular argued in debate that the constraints imposed by the Green Belt should apply equally to all sectors of the community. Pickmere PC objected to the principle of top-down quotas being imposed and was concerned about the costs to the community arising from unauthorised encampments.
- 3.46 The draft Policy has imposed requirements at the top end of the ranges set out in the Cheshire sub-region GTAA and we have already supported this approach [para 2.16]. Table 7.2 has not sought any redistribution between the authority areas from the GTAA findings. In our opinion the results have not taken sufficient account of the existence of temporary planning permissions which will expire before 2016. From the additional information we sought at the Data Meeting, this is a particular issue in Warrington. We

are concerned about the situation in this authority area where there are now 18 pitches the subject of temporary planning permissions⁷⁰ which will run out before 2016. The 10 pitches required by Table 7.2 would be insufficient for these Gypsies and Travellers. We therefore consider that an additional 10 pitches would be appropriate to account for this effect [but see also para 3.49].

- 3.47 We agree with the Merseyside Policy Unit that it is unclear why Table 7.2 apports additional pitch levels to both St Helens and Halton that are significantly above the GTAA findings. Consequently, and also taking account of the efforts made by Halton BC to build a transit site since 2007⁷¹ which in the process has provided 4 additional residential pitches used by the site managers, we consider that a reduction of 5 pitches would be appropriate for each of these authorities.
- 3.48 Although the provision figure for Cheshire East at 60 pitches is the highest in the region, this reflects the GTAA findings. We also note the existence of an extant planning permission for 24 pitches at Middlewich which has not yet been implemented⁷², which will go some way towards meeting the requirement level. The requirement in Cheshire West and Chester is also high (45 pitches) but reflects the GTAA findings. We were impressed by the actions currently being taken in Ellesmere Port where the Gypsy & Traveller Co-ordinator described in debate how the Council has accepted the provision of a temporary site (an 'accepted encampment') until permanent sites become available. Grant funding for sites had been achieved.
- 3.49 We must also apportion the additional need for 15 pitches arising from what we have argued to be an inappropriate deduction for pitch turnover in the GTAA [para 2.25]. In our view this increase should be evenly spread across all 5 constituent authorities.
- 3.50 The net effect of this increase and our previous redistribution because of temporary permissions, compared to Table 7.2, is that:
- 2 authorities increase by 3 pitches each (Cheshire East and Cheshire West and Chester for pitch turnover);
 - Warrington increases by 13 pitches (+3 for pitch turnover and +10 for temporary pitches); and
 - the remaining 2 authorities have a net decrease of 2 pitches each (+3 for pitch turnover and -5 to accord more closely with GTAA findings).

Recommendation 3.13

Increase the residential pitch requirement 2007-2016 for Cheshire East from 60 to 63 pitches [para 3.49].

Recommendation 3.14

Increase the residential pitch requirement 2007-2016 for Cheshire West and Chester from 45 to 48 pitches [para 3.49].

Recommendation 3.15

⁷⁰ Authorised Gypsy and Traveller Provision within Warrington – Schedule of Sites, Warrington BC, 26 January 2010, (DM28)

⁷¹ Submissions by Halton Council, on Gypsy and Traveller Accommodation Jan 2010 (DM7) and Report of the Urban Renewal Policy and Performance Board on Transit Site Provision of Sept 2007 (PD6)

⁷² Cheshire East notes submitted for the Data Meeting, Jan 2010 (DM6)

Increase the residential pitch requirement 2007-2016 for Warrington from 10 to 23 pitches [paras 3.46 & 3.49].

Recommendation 3.16

Decrease the residential pitch requirement 2007-2016 for St Helens from 30 to 28 pitches [paras 3.47 & 3.49].

Recommendation 3.17

Decrease the residential pitch requirement 2007-2016 for Halton from 45 to 43 pitches [paras 3.47 & 3.49].

- 3.51 Overall we conclude that the district level distribution set out in draft Policy L6 and Table 7.2 is largely correct, comprising an informed mix of provision based upon need where need arises and minor local redistribution in the interests of fairness and a comprehensive network of sites. It follows on from the findings of the GTAAs and only involves a small amount of redistribution within some of the sub-regions.
- 3.52 The result of our testing in this chapter has been to recommend minor changes to the district level residential pitch requirements within each sub-region. Nothing in this chapter has resulted in any increased provision levels to those recommended at the regional level in the previous chapter. Most of the district level changes that we recommend are those that arise from distributing additional pitches within Merseyside and Cheshire after rejecting the assumption that pitch turnover should contribute to supply [R2.2]; our concerns regarding the split between residential and transit sites in Greater Manchester [R2.2]; and a reduction in Blackburn with Darwen due to uncertain assumptions within the GTAA [R2.2]. However we have recommended a few minor redistributive changes arising from such local conditions as the number of temporary planning permissions in Warrington, and local needs identified through the GTAA in Cumbria.

4 TRANSIT PROVISION

Matters 2.1 and 4.4

This chapter assesses the provision for transit sites for Gypsies and Travellers made in draft Policy L6 and Table 7.2 and considers how these figures reflect the findings of the GTAAs. It supports the need for a network of transit sites evenly distributed across the region although recommends a change to the scale of transit provision in Greater Manchester. The chapter looks at informal and temporary transit site provision with particular regard to the adequacy of the policy approach to fairs and festivals, and recommends drafting changes to improve clarity.

EVOLUTION OF THE TRANSIT PROVISION IN POLICY L6

- 4.1 Transit sites are essential for Gypsies and Travellers if they are to be able to maintain their travelling way of life. One of the intentions of Circular 01/2006 is to “*recognise, protect and facilitate the travelling way of life of gypsies and travellers...*” The Government recognises that public transit sites will be needed where Gypsies and Travellers may legally stop in the course of travelling.
- 4.2 Draft Policy L6 contains the requirement that provision should be made for at least an additional 270 transit pitches by 2016, with the distribution set out in Table 7.2. This distribution makes provision for at least 5 pitches in each district, but with no provision in the Lake District National Park Authority area. FFT provided evidence concerning the need for such sites and supported their broad distribution. These transit sites are required by Gypsies and Travellers from existing sites who are travelling for work; by those who have no fixed base; by those travelling to fairs; and by those visiting friends and relatives. The region has a high proportion of Gypsies and Travellers living in bricks and mortar where there is no scope for visitors’ caravans, while some of the public and private sites prohibit visitors’ caravans.
- 4.3 According to the baseline data⁷³, in 2007 there were 70 transit pitches within the region. Since 2007 a further 14 transit pitches were constructed in Halton⁷⁴, although 4 of these are now in use as residential pitches by the site manager [para 3.47].
- 4.4 As with the residential sites, the requirement for transit pitches as set out in the Partial Review is broadly derived from the sub-regional GTAAs. The exception to this is Greater Manchester, where no breakdown between residential and transit pitch requirement was provided.

EVIDENCE OF NEED

Regional need

- 4.5 The North West Regional GTAA identified significant support for the provision of transit sites with 44% of households saying that they would use them⁷⁵. These included significant numbers of Gypsies and Travellers living on unauthorised encampments and on council sites. It identified that they would be used as a base for work and also for holidays and when visiting family especially during family emergencies.

⁷³ Current Authorised Provision (Gypsy and Traveller Pitches) in 2007, 4NW, 25 January 2010 (DM23)

⁷⁴ Planning permissions and new pitches constructed 2007-2009 4NW (DM5)

⁷⁵ North West Regional GTAA Final Report, 4.4.15, SHUSU and Pat Niner, May 2007 (RGT2)

- 4.6 When asked about site size, small sites of 10-15 pitches were preferred with each pitch able to accommodate 2 trailers. There was support for a regional network with sites near urban areas and road networks, as well as sites near villages and in the countryside. The regional GTAA recommended that there be a variety of transit provision in order to cater for the variety of needs and that the Regional Assembly take a lead in providing a broad strategic view of Gypsies and Travellers when travelling⁷⁶.
- 4.7 The Caravan Count figures also provide some evidence of need with the number of unauthorised encampments being an indicator of need. However, evidence at the Data Meeting⁷⁷ and anecdotal evidence during Examination sessions suggest that this Count is not entirely reliable. We agree that careful interpretation of this data source is required, particularly as frequently there is no evidence to show whether those living in unauthorised encampments have a fixed base elsewhere or whether they are seeking residential pitches.

Sub-regional distribution

Introduction

- 4.8 The sub-regional GTAAs each assessed the need for transit pitch provision. With the exception of the Greater Manchester GTAA they all based their calculations on surveying the unauthorised encampments and using information received from officers to make informed assumptions concerning the proportion of those in unauthorised encampments who were new or regular visitors to the study area (as opposed to groups moving within the study area). From this survey information the number of families was calculated, and based on interview results the number of those families seeking pitches was estimated. This is not a particularly robust method, however, as evidenced in the Merseyside GTAA where none of those surveyed were seeking transit accommodation in the study area so a further assumption was made to give an estimate of the number of families seeking such accommodation.
- 4.9 The estimated needs for each sub-region from the GTAAs were Cumbria 35 pitches, Lancashire sub-region 48-84 pitches, Merseyside 10 pitches and Cheshire sub-region 25-37 pitches. As noted earlier, we do not accept the use of ranges of figures and instead favour the use of the higher figure [para 2.16]. The circumstances of Greater Manchester are different as no figure for transit pitch provision was set out in the GTAA, although a total of 100 pitches was used in the Partial Review.
- 4.10 We have taken account of advice in the Good Practice Guide⁷⁸ which advises that for transit sites to be easily managed it has been shown that the number of pitches should not normally exceed 15. It also recommends that provision is generally made for a resident manager. We would emphasise the need for a network of pitches and agree that it is reasonable for each district, apart from the Lake District National Park as set out below [para 4.13], to have some provision in Table 7.2. However, there is no reason why local authorities should not work together to provide for that need. This would also enable the provision of a lesser number of larger sites which would then be sufficiently large to support a resident manager.

⁷⁶ North West GTAA Final Report, para 6.2.2 Recommendation 5, SHUSU and Pat Niner, May 2007 (RGT2)

⁷⁷ Caravan Count robustness, CLG, Jan 2010 (DM19)

⁷⁸ Designing Gypsies and Travellers Sites: Good Practice Guide, pp45-6, CLG & Housing Corporation, May 2008 (GT10)

4.11 There were few challenges at the Examination sessions to the transit provision figures in Table 7.2, although those for Merseyside were questioned in representations⁷⁹. We consider the justification for the district figures below.

Cumbria

4.12 The provision figure (40 pitches) is marginally higher than the GTAA assessment of around 35 transit pitches, although this was only up to 2012⁸⁰. The GTAA set out 3 possible options for their delivery, with the latter 2 being broadly based on a need where need arises basis:

- (1) an equitable split across the 7 administrative areas;
- (2) a split based upon the current known incidence of unauthorised camping; and
- (3) a split based upon the known population and location of Gypsies and Travellers.

4.13 Copeland BC⁸¹ queried the rationale behind the apportionment of pitches. In our view Table 7.2 is fair in providing an equitable split but with additional pitches in the districts (Carlisle and Eden) closest to the main north/ south road links (M6 and A6). We agree that no pitches need be provided in the Lake District National Park as pitches would be provided in each of the surrounding districts, and because no specific need was identified within the National Park boundary. Hence we support the distribution in Cumbria.

Lancashire sub-region

4.14 The provision figure (75) is within the range assessed by the Lancashire sub-region GTAA, although it contained no distribution by district. The even split of 5 per district for all but one of the districts was supported by the Central Lancashire Authorities and Fylde BC, while West Lancashire BC supported its provision figure of 10 pitches.

4.15 In Ribble Valley, the GTAA found a need for transit sites for 6 caravans but it was suggested that these be provided by “soft” options such as designated stopping places rather than transit sites, until a broader understanding of the needs in the broader Lancashire sub-region are understood. We do not consider that this would result in any certainty that the necessary provision would be made and so we consider that the figure of 5 pitches in Table 7.2 should be retained.

Merseyside

4.16 The provision figure (20) is higher than the GTAA needs estimate of 10 pitches. However we note uncertainties in this GTAA as the survey of unauthorised encampments was based on only 2 responses and so is not especially robust. No distribution by authority area was suggested.

4.17 Wirral BC queried their apportionment of 5 pitches in debate on the grounds of lack of proven need. However, we consider that as Wirral has good road links and is a route to ferries to Ireland, Northern Ireland and the Isle of Man it is reasonable to assume that there is likely to be some demand for transit sites from those travelling to or from the

⁷⁹ E.g. Representations 61 and 65

⁸⁰ Cumbria GTAA, Table 34, SHUSU, May 2008 (RGT13)

⁸¹ Representation 66

ferries. The same reasoning would also apply to Liverpool with its ferry port. Overall we support the figures in Table 7.2.

Cheshire sub-region

4.18 The requirement for these 5 authorities is towards the top end of the GTAA range, which again we support. There were no challenges to this. We have already acknowledged that Halton BC has provided a site that includes 10 transit pitches. This provision fully meets its requirement to provide 5 pitches. A larger requirement of 10 pitches for both Cheshire East and Cheshire West and Chester appears reasonable given their relative size, and accessibility on the main north/ south and east/ west routes.

Greater Manchester

- 4.19 In Greater Manchester the GTAA went further than the other sub-regions in that the survey sought locational preferences from respondents as to where transit pitches should be located. However, we have already noted our concern that this GTAA did not differentiate between residential and transit pitches. Table 6.1 of that GTAA indicates a need for 82 pitches arising from unauthorised encampments and, in the absence of any data to the contrary⁸², it appears that this figure has been rounded to 100 (10 transit pitches per district) although there is no evidence to demonstrate that such a level of need exists.
- 4.20 FFT argued that such a high figure could not reasonably be justified. They were concerned that by raising the figure for transit pitches there was a corresponding and equal decrease in the number of residential pitches. We share this concern. There is no justification in the GTAA for such a high figure; the GTAA itself acknowledges that the reporting of need for transit sites in Manchester and Salford reflects the existing pressure for permanent sites in these areas⁸³. On the other hand there is a genuine preference expressed for transit sites e.g. in Stockport, as there is currently no site provision in the district.
- 4.21 The district level figures for unauthorised encampments identify that 93% of those interviewed had no fixed base and 99% of these expressed a preference for living in trailers/ caravans. We do not consider that these Gypsies and Travellers can all reasonably be accommodated on transit sites and we conclude that the number of transit sites proposed is too high.
- 4.22 As set out above [para 2.23] we consider that the requirement for transit pitches in Greater Manchester should be reduced by 50 pitches, with a corresponding increase in residential pitches. Table 7.4 of the Greater Manchester GTAA identifies that there is a preference amongst Gypsies and Travellers for transit sites in each of the 10 constituent districts and so we recommend that the reduction should be spread evenly across all the districts.
- 4.23 Overall therefore we support the provision figures in Table 7.2, with the exception of the provision for Greater Manchester. This would result in the majority of authorities each providing 5 transit pitches, with 10 pitches in 5 authority areas that we have supported above [paras 4.13, 4.14 and 4.18]. Overall, therefore, with the reduction in transit pitches in Greater Manchester, we recommend that the total required for the region is reduced from 270 to 220 transit pitches.

⁸² as clarified by AGMA in debate

⁸³ Greater Manchester GTAA, para 7.17, arc⁴ for AGMA, July 2008 (RGT17)

Recommendation 4.1

Decrease the regional requirement for new transit pitches from 270 to 220 by reducing those in Greater Manchester from 100 to 50 pitches, spread equally between the 10 constituent authorities [paras 2.23 & 4.22-4.23].

ADEQUACY OF POLICY APPROACH ON FAIRS, FESTIVALS, AND OTHER INFORMAL GATHERINGS

Appleby Fair

- 4.24 The major event taking place in this region is the Appleby horse fair in late spring. Because of the scale of temporary accommodation needs that it creates – an estimated 1,400 caravans and horse-drawn vehicles with 5,000-10,000 Gypsies and Travellers – it was the subject of a special GTAA. This was designed to assist the creation of a strategic response to the Appleby Fair and offer pragmatic solutions to any issues arising. 248 interviews were carried out during the event in June 2007⁸⁴.
- 4.25 From the findings of this GTAA we consider that temporary provision for the event is essentially a management issue. There is already a range of land holdings used on a tolerated basis on Fair Hill outside Appleby owned by the Town Council, and in surrounding farmers' fields. Most Gypsies and Travellers interviewed wanted to use similar stopping places to the ones they were already using⁸⁵.
- 4.26 We were impressed to read about the multi-agency management body co-ordinated by Eden DC that is now into its second round of Three Year Improvement Plans. Lessons are apparently learnt after each annual event and fed back into the planning of the following one. However while the management of the event in and around Appleby itself appears to be exemplary, monitoring has identified a need for greater cooperation between a range of agencies to deal with issues arising from Gypsies and Travellers travelling to the event from far and wide. Most of the need for improved stopping places arises outside the North West. To the extent that they affect this region, it is assumed that the network of transit sites which would be delivered as a result of draft Policy L6, together with a similar provision in surrounding regions, would assist here.

Informal transit sites

- 4.27 It is clear from the GTAAs, and from the Cumbria GTAA in particular, that travelling and the resultant unauthorised encampments are complex phenomena. The Cumbria GTAA sets out the importance of building flexibility into the provision to take account of the diversity of travelling. The GTAA describes 2 fundamental aspects:
- i) the provision of larger pitches on residential sites to accommodate visitors; and
 - ii) variety in transit provision such as formal transit sites, less equipped stopping places, or temporary sites with temporary facilities available during an event or for part of the year.
- 4.28 With regard to the first option, this was supported in principle by GONW at the Examination sessions. We fully acknowledge and accept the benefits that would arise to residents with larger pitches. However, we do not consider that it would be an

⁸⁴ Appleby Fair GTAA, paras 1.1, 1.4, 3.11, SHUSU, May 2008 (RGT11)

⁸⁵ Appleby Fair GTAA, para 4.41 (RGT11)

acceptable alternative to the provision of transit sites. This is because such provision would only be of benefit to the pitch residents and their relatives and friends as they would not be available for use by the wider travelling community. We also consider that it would be very difficult to monitor such provision so the success or otherwise of such provision could only be measured by any reduction in unauthorised encampments or roadside camping.

- 4.29 With regard to the second option, we agree that variety is to be welcomed and in particular the provision of formal sites and temporary facilities during fairs and special events such as Appleby Fair. However, in other places the provision of less equipped stopping places would only be acceptable if they have the benefit of planning permission, have some form of management structure to ensure they are well maintained, and are available throughout the year.
- 4.30 Paragraph 7 of the supporting text to draft Policy L6 incorporates the same wording used to describe the variety of travelling needs as in the Cumbria GTAA. The risk in our view is that as currently written it could be construed that informal provision could be a way of meeting district requirements in Table 7.2. We do not consider that “tolerated” stopping places or temporary sites with temporary facilities available during an event can reasonably be considered to contribute towards the provision of transit sites as they do not have the benefit of planning permission and there is no certainty that they would remain available from one year to the next. Family gatherings, for example, are too unpredictable in occurrence and location for it to be practical to make provision for them. The intention of the proposed transit provision in draft Policy L6 is that it will obviate the need for many of the informal tolerated sites as they would be replaced by a network of managed sites.

Policy wording and supporting text

- 4.31 Draft Policy L6, 4th paragraph, recognises the importance of providing temporary accommodation in connection with festivals and other similar annual events, but states that it should not be regarded as formal transit provision. Although we endorse this statement, we are not convinced that it needs to be included in the policy itself for this region (as no actions flow directly from it). Instead, we suggest that the differentiation between formal and informal temporary accommodation is clarified in the supporting text, and by clearer language in Policy L6 and Table 7.2. On this basis we recommend deletion of the paragraph on temporary accommodation from the draft Policy.
- 4.32 We consider that paragraph 7 of the supporting text could be expressed much more clearly by putting the primary emphasis on local authorities working across districts, with private landowners and key Gypsy and Traveller groups to establish a network of formal transit sites. It could then acknowledge that flexibility to travel would be improved by the provision of larger pitches on residential sites giving the potential to meet the needs of short-term visitors, and that other informal accommodation also already exists including temporary sites with temporary facilities available during regular events, such as Appleby Fair, and less-equipped ‘tolerated’ stopping places used on a regular basis. It could also usefully note that good management is the key to the successful continuation of informal facilities of this kind, and possibly even encourage local authorities to work together to improve the management of stopping places used by Gypsies and Travellers on their way to Appleby Fair.
- 4.33 Also for clarification we recommend that draft Policy L6, 2nd paragraph, makes clear that provision should be made for a particular number [R4.1] of *formal* transit pitches, distributed as set out in Table 7.2. Similarly there should be a clear link through to the

heading in Table 7.2, final column, which we recommend is re-titled as Minimum additional *formal* transit pitches required 2007-2016, rather than *residential* transit pitches as they are currently described.

Recommendation 4.2

In draft Policy L6, delete the 4th paragraph on temporary accommodation for major festivals [para 4.31].

Recommendation 4.3

In draft Policy L6, 2nd paragraph sentence 2, insert "*formal*" before "*transit pitches by 2016*" [para 4.33].

Recommendation 4.4

Substitute "*formal*" transit pitches Table 7.2 final column heading instead of the misleading term "*residential*" transit pitches [para 4.33].

Recommendation 4.5

Clarify the supporting text to differentiate the need for formal transit pitches from a variety of other forms of informal accommodation [para 4.32].

5 SCALE OF PLOT PROVISION FOR TRAVELLING SHOWPEOPLE

Matters 2.1-2.3, 3.1 and 3.3

This chapter assesses the robustness and transparency of the method by which the regional provision figure for additional Travelling Showpeople accommodation has been derived. It then discusses whether greater emphasis should be given to meeting the backlog of needs in the short term, and if and how needs for the longer term and for temporary accommodation should be included in Policy L7.

EVOLUTION OF POLICY L7

- 5.1 Draft Policy L7 states that provision should be made for at least 285 net additional residential plots over the period 2007-2016. This figure represents an addition of some 64% to the estimated number of authorised plots (444) in 2007.
- 5.2 This plot provision figure is derived from summing the local needs components in the sub-regional GTAAs (258 plots), plus a small additional allowance made by 4NW.
- 5.3 At around the same time as the earliest GTAA work was being undertaken (for the Lancashire and Cheshire sub-regions), the Showmen's Guild organised its own survey of needs because its members and others were concerned that Travelling Showpeople were not being adequately consulted or represented⁸⁶. This involved 25 in-depth unstructured interviews in 2006/07 and a semi-structured questionnaire with responses from 412 Guild members. This is likely to represent a high proportion of the total population of Travelling Showpeople in this region, given the number of authorised plots (444), the small number of unauthorised plots, and the fact that one Guild member may represent more than one household e.g. taking account of extended families.
- 5.4 The needs estimates from the Showmen's Guild survey appear to have been incorporated into the Lancashire and Cheshire GTAAs. However the findings of the later GTAAs for Cumbria and Greater Manchester, commissioned after the issue of final guidance on GTAA methodology, have superseded the results of the Guild survey in these areas⁸⁷. No needs were identified in the Merseyside or Ribble Valley GTAAs, since there were no authorised sites there in 2007.
- 5.5 In preparation for its web-based forum in autumn 2008, 4NW inflated the regional need (to 325 plots⁸⁸). This appears from the debate to have been a response to informal feedback that needs had been underestimated. This inflated figure had been reduced before consultation took place on the interim draft Policy and was unchanged at the submitted draft stage.

ROBUSTNESS OF THE REGIONAL NEEDS ESTIMATE TO 2016 FOR TRAVELLING SHOWPEOPLE

- 5.6 There was virtually no challenge from participants to the scale of regional needs included in draft Policy L7, although Cumbria CC and others questioned the transparency of the method used by 4NW. Although there was no separate benchmarking of the Travelling Showpeople element of the GTAAs, we are content that

⁸⁶ The Accommodation Situation of Showman in the Northwest, p10, Dr Colm Power for the Showmen's Guild - Lancashire Section, June 2007 (RT1)

⁸⁷ These GTAA-based estimates were a little lower for Cumbria, and higher for Greater Manchester

⁸⁸ Draft Plot Distribution for the Accommodation for Travelling Showpeople policy – web forum, 4NW, Nov 2008 (PRE19)

a similar method has been used throughout the region, in part informed by the approach established in the Showmen's Guild survey, and certainly making use of the estimates of baseline population set out in that survey.

Components of need

- 5.7 In considering the components of need, it is noticeable that just less than 40%⁸⁹ appears to result from overcrowding, doubling up and concealed households, particularly in Greater Manchester. Indeed Showpeople interviewed in Greater Manchester were more than six times more likely to describe their home as overcrowded than Gypsies and Travellers⁹⁰. The authors of the regional GTAA advise that it was not legitimate to reduce need by assuming plots lost to vehicle overcrowding could be used for residential purposes⁹¹. We agree with this assumption, based on the extent of vehicle overcrowding within and around various sites particularly in Greater Manchester that we witnessed on our familiarisation tour.
- 5.8 It is also notable that the extent of unauthorised plots is very small (only 26 throughout the region). The Showmen's Guild stated that Travelling Showpeople generally avoid anything unlawful because they depend on good business relationships with local authorities in winning contracts to run funfairs and depend on the settled community as visitors to those fairs.
- 5.9 The remaining needs assessed arise from new household formation. It is significant that in the later GTAAs (Cumbria and Greater Manchester) that used a more detailed demographic method of assessing household formation, the results were slightly higher than those from the Showmen's Guild survey. This suggests that the estimates from this source of need may be slightly underestimated in the two earlier GTAAs (i.e. for the Lancashire and Cheshire sub-regions). The authors of the regional GTAA concluded that their overall estimate (which corresponds to that in the Guild survey) "should be regarded as a minimum requirement, which would more than likely increase"⁹².

Panel assessment

- 5.10 We agree with the authors of the regional GTAA that it is not appropriate to subtract an estimate for any potential supply of accommodation⁹³. We have given our reasons for accepting this advice on pitches lost due to vehicle overcrowding [para 5.7]. We are also satisfied from the debates that there are specific management issues that explain the vacancies on the site in Hyndburn and that it is not possible to be certain that these plots will remain available in the future, irrespective of the short length of tenure currently offered⁹⁴.
- 5.11 We are satisfied that a small uplift has been made by 4NW to the summation of the GTAA results for the following reasons:
- There may be a possible underestimation of household formation in two areas [para 5.9].

⁸⁹ Calculation based on summation of needs assessments given in Cumbria GTAA pp126-128, Lancashire GTAA pp120-124, Greater Manchester pp48-50, Cheshire pp120-123

⁹⁰ Greater Manchester GTAA, para 5.39, arc⁴ for AGMA, July 2008 (RGT7)

⁹¹ The same assumptions were made in the Lancashire GTAA, p122 and the Cheshire GTAA, p122

⁹² North West Regional GTAA Final Report, p134, SHUSU and Pat Niner, May 2007 (RGT2)

⁹³ North West Regional GTAA, p133 (RGT2)

⁹⁴ Lancashire GTAA also advises that no deduction should be made for vacancies, pp122-123 (RGT9)

- The GTAA estimate for Greater Manchester, which has the largest concentration of Travelling Showpeople homes, covered only the period up to 2015.
- There is no corroborative evidence on unmet needs from waiting lists, since all the Travelling Showpeople sites in the North West are privately run.
- There is no corroborative evidence from the Caravan Count, despite its acknowledged inaccuracies, because Travelling Showpeople have up till now not been included.
- No attempts appear to have been made to identify Travelling Showpeople that may have been forced into housing because of lack of site provision, although one such Showmen was interviewed in the Cheshire sub-region GTAA. The Showmen's Guild did not consider this was likely to be a major source of underestimation.

5.12 We therefore consider that the uplift of about 10% applied by 4NW is reasonable in these circumstances, and endorse the regional provision figure of at least 285 additional plots 2007-2016.

CLARITY OF SHORTER TERM NEEDS FOR TRAVELLING SHOWPEOPLE

5.13 We agree with GONW that draft Policy L7 does not specifically recognise the Government's objective of increasing significantly the number of Travelling Showpeople's sites to address underprovision over the next 3-5 years in accordance with Circular 04/2007, paragraph 14(a). However we do not consider it would be realistic to set interim target figures to say 2012, as suggested by GONW, particularly given that a lapsed time period of around 3 years would be required from start of work on a site allocations DPD to delivery of plots on the ground, even assuming that core strategy work was well advanced. This mirrors the reasons for rejecting a similar suggestion for Gypsy and Traveller provision figures in paras 2.32-2.33.

5.14 The supporting text paragraph 17 does however highlight an "urgent" need to address the shortage of Travelling Showpeople accommodation. We consider that this could be given added emphasis by making it action orientated and cross-referencing to Circular 04/2007 (as in our equivalent suggestions for Gypsies and Travellers, para 2.34). We do not however suggest any attempt to quantify the backlog, since this element is not clear from the various GTAAs. Our recommendation at R2.3 applies equally to Travelling Showpeople.

SCALE OF PROVISION BEYOND 2016 FOR TRAVELLING SHOWPEOPLE

5.15 To provide a longer-term context and certainty for the preparation of DPDs, draft Policy L7 seeks an annual increase in total regional provision for Travelling Showpeople accommodation of 3% compound. We agree with the premise behind this requirement given that DPDs should be planning for time horizons beyond 2016 as they do for mainstream housing, and in recognition of the fact that the needs for additional Travelling Showpeople accommodation will not simply stop at 2016.

5.16 Allerdale BC⁹⁵ and others raised concerns about the principle of requiring DPDs to plan for longer term needs when the scale of those needs has not been quantified in the

⁹⁵ Representation 33

- current GTAA's. Although acknowledging these and other uncertainties, on balance we consider that an indication of longer-term provision should be included for the same reasons as we explained in relation to Gypsies and Travellers accommodation [paras 2.36-2.39].
- 5.17 Cumbria CC and others objected to the use of a compound rate. We do not accept this, since not applying this would result in a diminishing rate per household the longer the time period being calculated.
- 5.18 GONW queried the appropriateness of a 3% figure given that the average family size of Travelling Showpeople is broadly in line with the settled community. We see the logic of this argument in that the national guidance to assume a 3% increase in the absence of local evidence specifically relates to the Gypsies and Travellers population⁹⁶. The only alternative figure suggested in debate was a 1.5% annual increase as included in the East of England RSS. However we note that this figure, as agreed by the Showmen's Guild, allowed not only for smaller family size but also a deduction for turnover of yards⁹⁷. We would be wary about suggesting the transfer of a figure from one part of the country to another without understanding any potential differences in circumstances, a point on which participants were unable to comment at the Examination.
- 5.19 The only locally-based information available to us is the assumption in the Cumbria GTAA of a 2% annual increase⁹⁸. We consider this to be the most appropriate evidence available to us and therefore recommend adopting a 2% annual increase for Travelling Showpeople accommodation in this region in acknowledgement of their family size.
- 5.20 As a mathematical consequence of assuming a 2% annual compound increase, there would be a revision necessary in Policy L7 such that the regional provision figure between 2016 and 2021 would be at least 76 plots, and we recommend accordingly. This would supersede the revision put forward by 4NW⁹⁹ which was a result of a mathematical correction revealed in preparing for the Data Meeting but which relates to a 3% annual increase.
- 5.21 We also recommend the same re-wording of that part of draft Policy L7 dealing with provision beyond 2016 as for Policy L6 [R2.4], together with an explanatory footnote to reduce uncertainty on the intended calculation method.
- 5.22 We agree with 4NW that, for consistency, the reference to residential "*pitch*" provision in this 1st sentence of the 2nd paragraph of draft Policy L7 should be amended to read "*plot*" provision, and recommend accordingly.

Recommendation 5.1

In draft Policy L7 2nd paragraph sentence 1 substitute:

- 2% instead of 3% [para 5.19];
- at least 76 plots between 2016 and 2021 instead of 122 [para 5.20];
- "*plot*" instead of "*pitch*" [para 5.22].

⁹⁶ Preparing RSS Reviews on Gypsies and Travellers by RPBs, section 3.3, CLG and Universities of Birmingham, Salford and Sheffield Hallam, March 2007 (GT4)

⁹⁷ East of England EiP Panel Report, para 6.9, Dec 2008 (PD9)

⁹⁸ Cumbria GTAA, p127, SHUSU, May 2008 (RGT13)

⁹⁹ 4NW Matter 3 statement

Recommendation 5.2

In draft Policy L7, 2nd paragraph sentences 1 and 2, clarify the intended method of taking forward plot requirements beyond 2016 using the same district distribution as 2007-2016 [para 5.21].

TEMPORARY STOPPING PLACES

- 5.23 The intent of the 3rd paragraph of draft Policy L7 caused confusion at the Examination in terms of:
- the meaning of temporary accommodation;
 - the implication that some form of dedicated temporary accommodation might be needed, and provided by someone; and
 - the distinction drawn between any such temporary accommodation and the permanent residential accommodation set out in Table 7.3.
- 5.24 In definitional terms we were told in the debates that Travelling Showpeople may need land on which to stay with their equipment for 2-3 days between events, when it would be too far or otherwise inconvenient for them to return to their home base. The Showmen's Guild survey reports that they currently make use of an informal network of some 17 stopping places. Nearly 60% of these are on private land with the consent of the landowner, e.g. farmers or hauliers (categorised as tolerated stopping places), while the remainder are where Travelling Showpeople are forced to use roadside lay-bys (termed illegal in the survey report)¹⁰⁰.
- 5.25 The Showmen's Guild categorically stated that they were not looking for any form of transit accommodation of the kind useful to Gypsies and Travellers, and that no one would fund, build or manage it in any event. They would prefer to make use of space in fellow Showmen's yards in suitable areas between venues, if those occupants were themselves away during the working season. However that would only be a practical proposition if sufficient new provision of residential plots had been made to reduce current levels of overcrowding, and the wider distribution sought in the Policy had been achieved.
- 5.26 Warrington BC suggested that local authorities should liaise proactively so as to agree longer stays on the licensed fairgrounds themselves both before and after an event to reduce the need for Showmen to find stopping places in the intervening period. Although this appears to be a practical and well intentioned suggestion, the Showmen's Guild considered that there would be few occasions when this would be realistic since their work nowadays involved less major events commissioned by local authorities and more travel between frequent smaller events.
- 5.27 In view of the obvious confusion and the strong views of representatives of the Travelling Showpeople community themselves, we see no need for a reference to temporary accommodation to be in Policy L7 at all. In our view each policy element should carry with it some requirement for action, and none is stipulated in the current wording. We therefore recommend its deletion.
- 5.28 In our view the existing reference to an informal network of temporary accommodation in the supporting text, paragraph 20, is adequate to describe these working needs.

¹⁰⁰ The Accommodation Situation of Showmen in the Northwest, p20, Dr Colm Power for the Showmen's Guild – Lancashire Section, June 2007 (T1)

Recommendation 5.3

In draft Policy L7 delete the 3rd paragraph on temporary accommodation [para 5.27].

Not issued

6 DISTRIBUTION OF TRAVELLING SHOWPEOPLE PLOT PROVISION

Matters 2.3, 3.2

This chapter examines the methodology used to derive the distribution of the regional plot requirement for Travelling Showpeople accommodation. The chapter considers the main drivers behind the proposed distribution and any limited challenges, before endorsing the district plot provision figures in Table 7.3.

ADEQUACY OF OPTIONS CONSIDERED FOR TRAVELLING SHOWPEOPLE

- 6.1 At the issues and options stage in spring 2008, 4NW defined 3 alternative ways of distributing the additional plots required for Travelling Showpeople up to 2016 to individual districts¹⁰¹:
- Option 1 used the local needs estimates directly from the sub-regional partnership GTAA's;
 - Option 2 modified the GTAA-based needs to provide a minimum level of plots in each district; and
 - Option 3 involved working with sub-regional partnerships and the Showmen's Guild to agree a more balanced share of meeting needs across districts.
- 6.2 The consultation response was in favour of Option 3¹⁰². There was no attempt to quantify the implications of these options at local authority level for the issues and options consultation. The first point at which Option 3 was quantified in terms of distributing additional plots to individual districts was in November 2008 in time for selective comment via the web-based forum. Subsequent reactions were complicated by the fact that the regional total had been inflated [para 5.5]. The distribution used for the formal consultation at the interim draft policy stage was similar to that now in Table 7.3, with a few minor differences particularly in the Greater Manchester authorities.
- 6.3 We agree that there was merit in 4NW's approach to the consultation on distribution options. It allowed it to seek views on the principle of providing a wider distribution of accommodation choices available to Travelling Showpeople, without getting bogged down in the precise apportionment to individual districts.
- 6.4 Some respondents however seem to have had difficulty in understanding the options¹⁰³. Indeed differentiating between the impacts of Options 2 and 3 appears to have challenged the Sustainability Appraisal consultants¹⁰⁴, as also noted for Gypsies and Travellers [para 3.7]. Nevertheless we accept that a preference for Option 3 emerged as the basis for taking forward the work.

¹⁰¹ Travelling Showpeople Options Paper, CAG Consultants for the NWRA, June 2008 (PRE27)

¹⁰² 10 responses in agreement and 3 in part agreement out of 22 responses, CAG report on consultation on the draft options, section 3.1, July 2008 (PRE24)

¹⁰³ E.g. No Mans Heath and District Parish Council, Representation 26

¹⁰⁴ Sustainability Appraisal Report – Issues and Options, pp28-29, Scott Wilson and Ben Cave Associates for the NWRA, June 2008 (PRE29)

BASIS FOR A WIDER DISTRIBUTION APPROACH FOR TRAVELLING SHOWPEOPLE

- 6.5 We agree that there is a strong case for new plots to be provided in a wider range of locations throughout the region that give better access to the work locations (fairs and other events) of many Travelling Showpeople. In 2007, the policy baseline, over 80% of the authorised plot provision for Travelling Showpeople was concentrated in Greater Manchester. This concentration contrasts strongly with the very extensive reach of work patterns, extending far beyond the North West itself¹⁰⁵.
- 6.6 On the basis of this imbalance it was correct, in our view, for 4NW to depart from the GTAA-based distribution in most areas, since this method only gives an estimate of needs where needs arise, as correctly explained in footnote 13 of the supporting text.
- 6.7 In bringing forward a regional policy on Travelling Showpeople accommodation, 4NW is probably the first to have had access to a detailed inventory of work patterns to inform decisions on a strategic view of plot provision. The data on work patterns was collected through a survey of Showmen's Guild members and analysed by 4NW – both parties are to be congratulated for this evidence base. Responses were received from 110 members giving monthly venues and travel, subsequently generalised onto a mapped basis by 4NW. The survey also captured preferences from some 350 members on the best location for their operating base. These preferences gave the single location most preferred (being split equally between component districts if the preference gave a more general area). Preferences were also given on multiple locations which would be acceptable.
- 6.8 It is clear that the main drivers of the distribution set out in Table 7.3 have been to increase equity and choice, and to take account of employment and transport considerations. These are important factors identified in the national guidance to RPBs in taking a more strategic view of the GTAA results¹⁰⁶. We support the view taken by 4NW that local environmental factors and other constraints, albeit important in decisions on site allocations at the local level, should not have a significant influence over the distribution of new plots at a regional scale. This is because of the small scale of land required (only some 11.5 ha required to accommodate the total regional figure for additional plots between 2007-2016). 4NW rightly, in our view, draw attention to the difference in challenge between finding land for 32 plots per year¹⁰⁷ for Travelling Showpeople and land for over 23,100 new dwellings on average per year¹⁰⁸. We also agree that other factors identified in the national guidance, such as social inclusion and flexibility, are most relevant in making site allocations at the local level.
- 6.9 To our mind, the case made by 4NW for a wider distribution of Travelling Showpeople plots is soundly based on evidence and has been documented clearly¹⁰⁹ at the conceptual level. The issue for us is whether the detailed results of the wider distribution are appropriate at sub-regional and district level.

¹⁰⁵ The Accommodation Situation of Showmen in the Northwest, pp9-14, Dr Colm Power for the Showmen's Guild – Lancashire Section, June 2007 (RT2)

¹⁰⁶ Preparing RSS Reviews on Gypsies & Travellers by RPBs, pp 47-56, CLG and Universities of Birmingham, Salford and Sheffield Hallam, March 2007 (GT4)

¹⁰⁷ Technical Background Paper – Gypsies & Travellers and Travelling Showpeople Pitch Provision, pp 27 and 30, 4NW, July 2009 (PR7)

¹⁰⁸ North West of England Plan RSS to 2021, Policy L4, Table 7.1, GONW and CLG, Sept 2008 (RSS1)

¹⁰⁹ Technical Background Paper, Appendix 5 (PR7)

PROPOSED SUB-REGIONAL PROVISION FOR TRAVELLING SHOWPEOPLE

6.10 Table 7.3 proposes that a considerable proportion of the need for additional accommodation arising in Greater Manchester (just over 25%¹¹⁰) will be met in the Lancashire, and to a lesser extent Cheshire, sub-regions. There was relatively little objection overall to the resulting plot distribution, the exceptions at sub-regional and district level being discussed below. However some participants criticised a perceived lack of transparency in 4NW's method of redistribution.

Transparency of 4NW's method

6.11 In our view 4NW have been reasonably clear on their method, and we understand that its representatives explained their method to local authorities in workshops during the consultation on the interim draft policy. The distribution of the additional plot figures is based on applying the single preferences for an operating base identified by Travelling Showpeople themselves to the net addition of plots required at the regional level 2007-2016, apart from in Cumbria where the GTAA estimate is used. This description enabled the Panel to recreate the mathematics quite easily. We did not expect the results to match exactly the figures in Table 7.3, since we agree with 4NW that a redistribution should not be a mechanical exercise, and because the resulting figures have been adjusted to take account of 2 sets of consultation responses¹¹¹.

Discussion by sub-region

Cumbria

6.12 The resulting plot requirement for Cumbria almost exactly mirrors the GTAA needs-based estimate. We support the figure of 20 additional plots for the following reasons:

- Given its peripheral location to the rest of the region and its largely rural nature, it is appropriate for Table 7.3 to reflect the local needs-based estimate.
- The proportion of Travelling Showpeople interviewed during the GTAA was the highest in the region¹¹², hence confidence can be placed in the needs-based estimate.
- The difference between the sub-regional total in Table 7.3 and the GTAA estimate (18) is not material, hence we do not sympathise with Cumbria CC's objection.

Lancashire sub-region

6.13 The plot figure in Table 7.3 for the Lancashire sub-region (75) is significantly higher than the GTAA-based assessments (9). We have already expressed doubts on the accuracy of the Lancashire GTAA figure [para 5.9] and we also note that only one Travelling Showperson was interviewed in this study. Preston City Council also cast doubt on the use of the single preference figures at the Data Meeting on the basis that it was difficult to distinguish those satisfied with their base location from those giving a preference for another location. We accept that there are uncertainties in applying the

¹¹⁰ The GTAA-based assessment of 210 plots minus 155 in Table 7.3 divided by 210

¹¹¹ The distribution for the web-based consultation in PRE19, although with a larger regional total, almost exactly matches the percentage distribution from Appendix 3 of the Showmen's Guild's preference survey (RT2)

¹¹² 20% of the total interviews, 23 people on 4 out of the 5 yards, Cumbria GTAA, pp32 and 102 (RGT13)

Showmen's Guild results precisely, but overall we are satisfied that they indicate a strong preference for several sets of locations in Lancashire. We support the figures in Table 7.3 for the Lancashire sub-region having also taken account of the following:

- the scale of overcrowding witnessed in and around existing sites in Bolton and on the northern fringes of Manchester city centre;
- the stated willingness of Travelling Showpeople through the Showmen's Guild spokesman to be entrepreneurial in buying land and establishing a new base for an extended family unit if suitable sites acceptable to local authorities were identified; and
- the circumstances revealed in a recent appeal at Garstang in Wyre borough which demonstrated the willingness of the potential occupants to move from currently overcrowded living conditions in Greater Manchester¹¹³.

Greater Manchester

- 6.14 Although the proposed figure for Greater Manchester (155) is significantly less than the GTAA-based estimate of 210, this level of implied redistribution was insufficient to satisfy AGMA. Its representatives argued that even with this redistribution, Greater Manchester would still have 70% of the regional plots at 2016¹¹⁴.
- 6.15 Bury Council had also disputed at the Data Meeting the confidence that could be placed in the single preference figures on the basis that preferences for alternative locations for an operating base should have been counterbalanced by reductions in the areas of greatest concentration now. We acknowledge these uncertainties but do not consider that it invalidates the use of the survey. It is not possible to do a straightforward subtraction in that existing Showmen's Guild members were expressing preferences not just for themselves, but also for those currently concealed households and those who will form households in the next few years.

Merseyside

- 6.16 There is no proposed plot provision in Merseyside, and indeed no existing provision. Some parties thought this unfair¹¹⁵. We agree with AGMA that this looks strange in view of its motorway connections and that its settlement characteristics are little different from those in Greater Manchester. However, we were left in no doubt by the Showmen's Guild about the harassment and intimidation to which members are subject as well as vandalism to vehicles. Despite a hope that things will improve as a result of urban renaissance/regeneration policies, we feel we have no option but to take the Showmen's Guild fears seriously.

Cheshire sub-region

- 6.17 The proposed figure for the Cheshire sub-region (35) is greater than the GTAA-based estimate (21). We have already given reasons for considering the GTAA estimate to be low [para 5.9]. The implied redistribution is from the existing sites on the western side of Greater Manchester particularly Salford and also from Manchester itself. We have some concerns that the proposed scale of redistribution is less than that implied in the

¹¹³ Appeal Decisions Letter on appeals made by Mr S.J Cubbins in respect of land at Utopia Park, Kepple Lane, Garstang, Lancashire (refs: APP/02370/C/08/2068282 and APP/02370/A/08/2066405), 20 May 2009 (DM30)

¹¹⁴ AGMA Matter 3.2 statement

¹¹⁵ e.g. Lathom South Parish Council, Representation 56

Showmen's Guild's preference survey, while acknowledging that some of these responses were not specific as to the district of choice within the Cheshire sub-regional partnership area.

- 6.18 However, taking account of all the above factors and the subsequent discussion of district level issues, we support the sub-regional totals proposed for Greater Manchester, Merseyside and the Cheshire sub-region.

PROPOSED DISTRICT LEVEL PROVISION FOR TRAVELLING SHOWPEOPLE

- 6.19 We have already accepted the merits of using the single preferences for an operating base expressed in the Showmen's Guild locational survey as the main input to the distribution of new plots. The influence of these preferences on the resulting redistribution from Greater Manchester to the 3 authorities in central Lancashire and the 3 authorities in the Fylde coastal area is clear from the map helpfully provided by GONW¹¹⁶. The extent of redistribution outwards is greatest from Bolton and Salford, and to a lesser extent from Manchester, Tameside (and Wigan). A small amount of this redistribution has been into other authorities in Greater Manchester and into the 2 new Cheshire authorities and St Helens. No redistribution has taken place into areas where no preferences were identified in the Showmen's Guild survey.
- 6.20 The issue here is whether there are any additional factors that should have modified this distribution at district level.
- 6.21 All plot provision figures are in multiples of 5. This accords well with the recommended module for the design of new yards to cater for an extended family¹¹⁷. The only implied objection to this distribution guideline was from Cumbria CC who argued for a marginal adjustment in 3 of their constituent districts to reflect the GTAA results. We do not consider these adjustments, involving at most a reduction of 2 plots for South Lakeland, to be material.
- 6.22 Blackpool Council argued that the distribution of fairs should have been taken into account, alongside the Showmen's Guild members' preferences. This it argued might alter the distribution with its neighbouring authorities of Fylde and Wyre. We accept the riposte made by the Showmen's Guild that taking account of large fairs (the only source of information that would be available) would artificially distort the picture. We therefore agree that this factor could not really be used as a means of fine tuning the distribution. Given the good motorway accessibility enjoyed by each of these 3 authority areas, as well as being popular leisure destinations, we support the provision figures in Table 7.3.
- 6.23 Several authorities, including in central Lancashire, suggested that insufficient account had been taken of lack of demand, as evidenced by pre-application enquiries or consultations, in locations which currently have little or no existing provision for Travelling Showpeople. They implied that if sites were provided there would be risk of them not being taken up. We do not share this view, favouring instead the Showmen's Guild's alternative explanation that an absence of pre-application enquiries is more likely to reflect a caution borne of previous failed attempts to get planning permission despite having bought or secured an option on land often involving taking out a mortgage. It is incumbent on local authorities if they use a 'call for sites' in the early

¹¹⁶ Map 1, Distribution of Travelling Showpeople Plot Provision attached to GONW Matter 3 statement

¹¹⁷ Best Practice Advice on Provision of Showmen's Permanent Parking Sites, Showmen's Guild of Great Britain, June 2008 (TS3)

stages of preparing a site allocations DPD that representative bodies of Travelling Showpeople (and indeed Gypsy and Traveller communities) understand the implications of this.

6.24 We dismiss the scepticism expressed by particular local authorities as follows:

- Central Lancashire - these 3 authorities are at the centre of the region and highly accessible to the motorway system in north/ south and east/ west directions. Preston emerged as the most preferred location after Bolton in the Showmen's Guild survey, with Chorley and South Ribble also within the top 15.
- Cheshire East - this area is also highly accessible to north/ south motorway links, and at its northern end also to east/ west motorway links. It also adjoins Manchester which is more densely built up and has existing overcrowded sites. The allocation to Cheshire overall is slightly lower than the preferences identified in the Showmen's Guild survey when account is taken of those members who identified a preference for the former county rather than individual district [para 6.17]. It is not appropriate to treat its allocated provision figure as a maximum.

6.25 Bury Council argued strongly that account should have been taken of the ability of individual districts to accommodate additional Travelling Showpeople plots. Despite the detail provided on pressures on its urban area and the extent of the borough covered by landscape and heritage designations and flood risk zones, we are not convinced of its arguments that it could not identify suitable land for such a small number of additional plots (10). We are not seeking to minimise the local challenges in identifying deliverable sites, but we do not consider that a special case could be made for reducing this allocation, for the following reasons:

- Bury already has a Travelling Showpeople site with 20 plots¹¹⁸ from which local needs will arise.
- It did not submit objections to the same plot level at the interim draft stage, although 4NW accepted that general concerns had been raised informally.
- There is a process of justifying a release of Green Belt land if this were found to be the most sustainable way forward.
- The policy allows for a possible redistribution between districts through a joint working process.

6.26 These last 2 points may be relevant in other authorities within Greater Manchester in response to AGMA's reservations about the district distribution. There is certainly no case in our view for any delay in adopting Policy L7 (and Policy L6) to enable further work to be undertaken on land availability at the district scale.

6.27 Overall therefore we endorse the plot provision figures by district in Table 7.3. The single preference data has been the main influence on the distribution but has not been used exclusively. Adjustments for other factors were made by 4NW in response to the web-based forum and the formal consultation at the interim draft policy stage. The process adopted by 4NW accords with the national guidance to RPBs in taking a strategic view of the GTAA results.

6.28 We also support the 2007-2016 proportionate distribution by district being used at this stage as the basis for apportioning plot provision beyond 2016. However when Policy

¹¹⁸ The Accommodation Situation of Showmen in the Northwest, p15, Dr Colm Power for the Showmen's Guild – Lancashire Section, June 2007 (RT1)

L7 is next reviewed, consideration should be given as to whether at least parts of Merseyside might accommodate some Travelling Showpeople plots.

Not issued

7 GUIDANCE FOR MAKING ALLOCATIONS FOR GYPSIES AND TRAVELLERS AND TRAVELLING SHOWPEOPLE IN LOCAL DEVELOPMENT FRAMEWORKS

Matters 3.4, 4.5, 5.1, 5.2

This chapter considers whether the guidance in draft Policies L6 and L7 and the supporting text provide sufficient guidance for plan makers and those determining planning applications at the district level. There are recommendations for amending the wording of both draft Policies and their supporting text to improve clarity and avoid duplication with national guidance.

PROVISION IN DEVELOPMENT PLAN DOCUMENTS

- 7.1 This chapter considers the translation of additional pitch and plot numbers in Tables 7.2 and 7.3 into documents within the LDF. Despite separate Circulars, we assess the adequacy of guidance in this Partial Review for Gypsies and Travellers and Travelling Showpeople together, since there are many shared challenges and, in our opinion, scope to reduce duplication in the supporting text.
- 7.2 Circulars 01/2006 and 04/2007 set out the context for a more proactive and positive approach to the provision of Gypsy and Traveller pitches and Travelling Showpeople plots respectively, through the identification of sites in DPDs. They both highlight the need to set out criteria in a local authority's core strategy to guide the site finding process, such that specific land can be allocated sufficient to meet the RSS pitch and plot numbers for that area¹¹⁹. Both Circulars also make clear that these criteria should also be used in the determination of planning applications on unallocated sites that may come forward.
- 7.3 LDF preparation has been relatively slow in the North West for various reasons, with only one district having an adopted core strategy at the time of the Examination. Both draft Policies are therefore realistic, in our view, in recognising that pitch and plot delivery to achieve the required provision levels by 2016 will involve both the determination of planning applications through the development management system, and plan making. It is crucial however that draft Policy L7 explicitly requires LPAs to identify site allocations rather than simply prepare Local Development Documents (LDDs)¹²⁰. 4NW agreed to this change and we recommend accordingly [see also R7.2].

Recommendation 7.1

Revise draft Policy L7, 4th paragraph, bullet 2 to read "*the identification of sufficient sites in Development Plan Documents*", rather than "*the preparation of Local Development Documents*" [para 7.3].

- 7.4 Nevertheless we were encouraged to hear of a number of authorities who have begun the process of site finding, e.g. Cheshire West and Chester Council, and Wyre BC.
- 7.5 For any authority where the number of sites to be allocated is relatively small, we were given to understand that land for Gypsy and Traveller pitches and/or Travelling Showpeople plots could be included in a housing site allocations DPD. In response to a

¹¹⁹ Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites, paras 31 and 33, ODPM, Feb 2006 (GT2) and Circular 04/2007: Planning for Travelling Showpeople, paras 24 and 25, CLG, Aug 2007 (TS1)

¹²⁰ Circular 04/2007, para 24 (TS1)

query by Blackpool Council, GONW also clarified the circumstances in which a strategic site allocation could be made within a core strategy¹²¹.

- 7.6 Joint working between neighbouring authorities may well be an efficient way forward where the pitch and/or plot numbers apportioned to individual districts are relatively small. This might facilitate the identification of viable options, particularly for Gypsy and Traveller transit sites [para 4.10]. We understand that Allerdale BC and Copeland BC are intending to adopt joint working¹²². We are content that the final paragraph of both Policies encourages such practice.
- 7.7 In passing we also note that the mechanism for identifying sites for pitches and plots is through a DPD that is subject to formal examination. We therefore recommend that references to LDDs are amended to DPDs in both policies. We acknowledge however that where a local authority wishes to prepare guidance e.g. on the design of Gypsy and Traveller or Travelling Showpeople sites a supplementary planning document (SPD) would be appropriate, in which case that would fall within the generic category of a LDD.

Recommendation 7.2

Substitute Development Plan Documents for Local Development Documents in draft Policy L6 5th and 7th paragraphs, and in draft Policy L7 6th paragraph [see also R7.1] [para 7.7].

TENURE

- 7.8 Both policies include a reference to additional pitch and plot provision being provided "*across a range of sites and tenures*". Despite this reference, some housing professionals in the Greater Manchester area were under the false impression that in the event of private sites not being brought forward, the public sector might have to implement all the required pitches and plots. Given that this source of confusion was later pinned down to a statement in one of the background documents¹²³, and that neither we nor any other participants were confused by the policy intent, we see no need to change this aspect of the policy wording. Overall, we agree with 4NW that both Policies should remain tenure-neutral.

Gypsies and Travellers

- 7.9 Paragraph 13 of the supporting text to draft Policy L6, while acknowledging the role of public sites, seeks to encourage the provision of sites by the private sector. FFT pointed out the strong parallels with social housing and commented that in the North West there is currently an even public/ private sector split. FFT sought assurance that public sector provision would be made. The GTAAs identified that while many Gypsies and Travellers would prefer to own their sites, this was not always feasible.
- 7.10 Some authorities, including Burnley BC and Pendle BC, were concerned that no public sector/ private sector ratios were set out in the supporting paragraph. In debate

¹²¹ Extract from the CLG Progress Report on Gypsy and Traveller Policy (GT12), paras 18 and 19, CLG, July 2009 (PD17) and Note from GONW on the inclusion of Gypsy and Traveller sites in core strategies, GONW, 4 March 2010 (PD20)

¹²² Representation 66

¹²³ about possibly treating all private pitch requirements as a requirement for affordable rather than market housing, Technical Background Paper – Gypsies and Travellers and Travelling Showpeople Pitch Provision, p38, 4NW, July 2009 (PR7)

Blackburn with Darwen BC argued that this split is not a matter for the Partial Review to determine. While we agree with that opinion, we would wish to emphasise that this is not necessarily a matter of a simple division between public and private provision. There is no reason why hybrid schemes should not be progressed using innovative ways of delivery where, for example, the local authority might provide the land and the Gypsies and Travellers themselves provide the necessary infrastructure. This could include self-build by Gypsies and Travellers of the necessary utility buildings as suggested by GONW.

- 7.11 ITMB also suggested at the Examination that land exchanges be introduced, where Gypsies and Travellers have to relocate from land in their ownership if planning permission is not forthcoming for existing unauthorised developments. We welcome this type of innovative approach.

Travelling Showpeople

- 7.12 Paragraph 25 of the supporting text to draft Policy L7 recognises that many Travelling Showpeople would prefer to buy and manage their own sites. The Showmen's Guild identified that tenure is a "massive issue" for them. They raised the problems associated with a privately-owned site in Hyndburn where plots had only been available for short term rent due to management issues [para 5.10].
- 7.13 The Travelling Showpeople are very keen to develop their own sites. Vehicles and equipment are inseparable from the residential accommodation for security and insurance reasons. The Travelling Showpeople would be prepared to enter joint working arrangements with local authorities. Paragraph 29 of Circular 04/2007 identifies some ways in which land might be made available for Travelling Showpeople. In common with Gypsies and Travellers, there is scope for innovative ways of delivering sites in a variety of tenures, such as lease-back from local authorities and public/ private sector hybrid schemes.

ENGAGEMENT

- 7.14 Draft Policy L6 refers to the need to take account of the specific needs of different groups of Gypsies and Travellers. At the Examination, Irish Community Care Merseyside (ICCM) emphasised the need for ongoing and meaningful dialogue between local authorities and their communities, and referred to the problems caused by insufficient sites with a large number of Gypsies and Travellers in immediate need. This creates tension within the travelling community. FFT raised the importance of catering for the needs of both the Irish Travellers and the Romany Gypsies - the key to diversity is management. The need for a range of sites and the possibility of a district providing more than one site is acknowledged in the supporting text to draft Policy L6, paragraph 8.
- 7.15 The need to recognise diversity within different groups of Travelling Showpeople is also implied in draft Policy L7. While also emphasising the need for meaningful dialogue, the Showmen's Guild did not lead us to believe that there were different groups within the Travelling Showpeople community. We therefore consider that this reference is confusing and risks diluting the acknowledged need to recognise diversity within Gypsies and Travellers. We recommend that it is sufficient for Policy L7 to require LPAs to take account of the specific needs of Travelling Showpeople without any reference to different groups.

- 7.16 Another key point, again raised by FFT, relates to the need for dialogue to be ongoing. Engagement in assessing needs through GTAAs and in site finding needs to be iterative and to show some positive results. The use of outreach workers from within the Gypsy and Traveller and Travelling Showpeople communities can build up trust. The use of consultants for short-term contracts does not assist the process. It could result in the provision of unsuitable sites or tokenism which can be counter-productive and harm long-term relationship between local authorities and Gypsies and Travellers.
- 7.17 Examples of where engagement had worked successfully were mentioned in debate. In particular there is a multi-agency approach to provide an improved service for Gypsies and Travellers in Hyndburn. This regular monthly contact makes it easier to engage with the community. Cumbria has a similar all-embracing approach involving the local authorities, the police and the Gypsy and Traveller community, as does Merseyside involving also health and education interests.
- 7.18 One of the challenges of translating a wider distribution of pitches and plots into LDFs is that some local authorities will need to make site allocations without having resident travelling communities to consult. On first sight this may appear to be an issue for 13 local authorities who had no authorised Gypsy and Traveller provision in 2007 and 11 such local authorities for Travelling Showpeople. However there may well be Gypsies and Travellers in bricks and mortar or on unauthorised developments or encampments in those districts with whom the local authority could liaise. Engaging with local Travelling Showpeople may be more difficult due to their current concentration in Greater Manchester, but the Showmen's Guild is clearly prepared to take a proactive approach and have discussions with any local authority on behalf of its members. We welcome such an open approach to engagement.
- 7.19 As an example of good practice, Wyre BC has apparently set up a forum to assist the process of site finding, despite having no authorised sites for either Gypsies and Travellers or Travelling Showpeople at 2007. We were also impressed by offers made in debate to assist this process in terms of:
- sharing experience of managing sites (Blackpool Council);
 - attending its multi-agency meetings (Hyndburn BC);
 - working across local authority boundaries (ICCM); and
 - sharing knowledge (Cheshire Partnership Gypsy and Traveller coordinator).
- 7.20 We accept the point made by Mollington PC that there should be formal consultation with the settled community in the process of identifying sites. To our mind this is sufficiently emphasised in draft Policy L6, 5th paragraph and draft Policy L7, 4th paragraph, which mentions the need to work with settled communities alongside housing and other professionals, site managers, and local Gypsies and Travellers or Travelling Showpeople. Formal consultation requirements are built into the process of preparing all documents within the LDF as set out in PPS12.

Recommendation 7.3

In draft Policy L7, 4th paragraph sentence 1 delete the reference to the specific needs "*of different groups*" of Travelling Showpeople [para 7.15].

LOCATIONAL CRITERIA AND SITE CHARACTERISTICS

- 7.21 Paragraphs 8 and 22 of the supporting text to draft Policies L6 and L7 state that the more specific location and design of sites is a matter for local authorities to address in LDDs. The paragraphs refer to Government advice in Circulars 01/2006 and 04/2007. We consider that this supporting text needs to have its emphasis changed as at present it reads like criteria rather than 4NW's intention of listing considerations useful to the site finding process. While some participants, such as Heine Planning, considered it useful to have a checklist of considerations, others were concerned that too long a list would make it easier for local authorities (particularly Members) to resist proposals. Particular concerns were raised by FFT and the Showmen's Guild about the difficulties of meeting some of the criteria e.g. sites needing to be accessible by public transport. GONW was concerned that a lot of the supporting text either repeats Government advice or subtly changes it. We consider that locational criteria are best left to the individual DPDs.
- 7.22 We suggest that the supporting text should cover just a few basic considerations that would assist in site finding; it should not be a development control checklist. Our suggestions for simplifying the text are given at the end of this chapter. In any event we do not think that any references to pitch/ plot size are necessary, since there is national advice for local authorities in the Gypsy and Traveller¹²⁴ Good Practice Guide. In respect of Travelling Showpeople, although there is no national guidance, design advice has been prepared by the Showmen's Guild¹²⁵.
- 7.23 Blackpool Council suggested that site finding should seek to identify a range of locations as well as the range of sites and tenures acknowledged in the draft Policies. Although we agree the benefits in principle of achieving a range of urban and semi-rural locations across the region, this may not be possible at the level of an individual local authority. Hence we do not suggest any revisions to the draft Policies.
- 7.24 The Department of Health¹²⁶ suggested that the consideration of health issues should be expanded in the supporting text to both Policies to include wellbeing and care. 4NW agreed¹²⁷ to this change and we accept its merit in making this consideration more inclusive, but in the context of our overall conclusions on the format of the supporting text.
- 7.25 The first bullet points in both draft Policies L6 and L7 refer to taking advantage of opportunities in respect of major new development. At present there are few such development opportunities in the North West region due to the state of the economy but opportunities for co-location may become available, so the point is also relevant beyond 2016. While residential schemes are generally more suitable for the provision of sites for Gypsies and Travellers, major commercial developments would represent an opportunity for site provision for Travelling Showpeople given their mixed use nature. This would also be the case for any Gypsies and Travellers seeking to accommodate business uses within their sites. We do not consider that the wording of the draft Policies need to be changed to expand further on this.

¹²⁴ Designing Gypsy and Traveller Sites: Good Practice Guide, CLG, May 2008, (GT10)

¹²⁵ Travelling Showpeople's Sites – A Planning Focus Model Standard Practice, Showmen's Guild of Great Britain, Sept 2007, (TS2)

¹²⁶ Representation 50

¹²⁷ Changes agreed by 4NW during EiP debate, March 2010 (PD24)

RURAL EXCEPTIONS AND GREEN BELT

- 7.26 PPS3¹²⁸ identifies that “rural exception site” policies may be used to allocate small sites to be used for affordable housing in small rural communities. We are content with this phrasing being used in paragraph 11 of the supporting text to draft Policy L6 in accordance with Circular 01/2006 paragraphs 47 and 48.
- 7.27 GONW quite rightly pointed out that rural exceptions site policies cannot relate to a site for Travelling Showpeople because it would include business and storage uses as well as residential. We also note that Circular 04/2007 is more circumspect on the appropriateness of Travelling Showpeople sites in rural areas than its Gypsy and Traveller counterpart. Nevertheless we have sympathy with 4NW's intent to signal that, if a pre-existing development in the countryside became vacant, it could be suitable for a Travelling Showpeople site while not being a suitable location for mainstream housing. We envisage that wartime storage buildings or depots might be examples. We therefore suggest that the supporting text to Policy L7 should be amended to state these circumstances and say that favourable consideration should be given to allocating such sites for Travelling Showpeople with safeguards to prevent a change of use at a later date to mainstream housing.
- 7.28 Paragraphs 12 and 24 of the supporting text refer to advice on locating sites in the Green Belt in Circulars 01/2006 and 04/2007 and in PPG2. Both paragraphs require that *all other* [our emphasis] alternative sites should be explored before Green Belt locations are considered. Heine Planning considered that this would involve setting the bar too high; it would be impossible to demonstrate compliance. GONW stated that the wording differed from advice in Circular 01/2006¹²⁹ which refers to the exploration of “alternatives”. CPRE took the opposite view and thought the Circular wording to be too weak on the basis that the Sustainability Analysis makes it clear that all alternatives should be looked at.
- 7.29 We agree that the existing wording would make it impossible to demonstrate compliance, and if it were to remain it should simply say that alternatives should be explored before Green Belt locations are considered. However in our suggestions for simplifying the supporting text we envisage that a cross-reference to the existing national guidance would suffice.
- 7.30 West Lancashire BC argued for stronger encouragement to local authorities to consider Green Belt alterations. It wanted to see the maximum flexibility for the Council to find sites; it sought to include references to alterations to the Green Belt boundary, and also the use of rural exceptions sites, in the policy wording itself. We do not consider it necessary in this region to include them in the actual policy due to the existing encouragement within the Circulars¹³⁰, advice in PPG2 and PPS3, and the relatively small numbers of pitches and plots to be provided per district.
- 7.31 Both draft Policies contain a list of other policies in the North West Plan that should inform site identification. Previously we would have considered these references to be superfluous in the published Partial Review, but given the transfer to a new system of Regional Strategies, we support their continued inclusion. On that basis and for

¹²⁸ Planning Policy Statement 3: Housing, para 30, DCLG, 2006, (PPS3)

¹²⁹ Circular 01/2006, para 49, ODPM, Feb 2006, (GT2)

¹³⁰ Although there is no equivalent statement in Circular 04/2007 on altering Green Belt boundaries, GONW confirmed that the same process would be expected to apply for Travelling Showpeople sites

completeness we recommend an additional cross-reference to the regional policy on Green Belts (Policy RDF4)¹³¹.

Recommendation 7.4

In draft Policies L6 and L7 penultimate paragraphs, include an additional cross-reference to Policy RDF4 on Green Belts [para 7.31].

SUPPORTING TEXT TO POLICIES L6 AND L7

7.32 Many of the considerations relating to site finding for Gypsies and Travellers also relate to Travelling Showpeople, and vice versa. In order to avoid unnecessary repetition, we consider that the wording of the supporting text should be re-ordered and reduced. We set out our suggestions below, which envisage a common introduction to both Policies, with any distinctive features for Gypsies and Travellers following Policy L6 and the same for Travelling Showpeople following Policy L7.

Combined introductory paragraphs

- 7.33 We agree with the current supporting text that an early mention needs to be made of the Government's key objective of providing decent homes for all as set out in paragraph 1 of Circular 01/2006 and paragraph 10 of Circular 04/2007. (*Replacement of existing paragraphs 1, 2, 14 and 15*). This opening could usefully advise of the need to take account of Government advice in these Circulars because much of the supporting text currently repeats sections of this advice.
- 7.34 The urgency of the need to address the shortage of accommodation for both Gypsies and Travellers and Travelling Showpeople ought to be clearly spelled out [as we have already suggested in paras 2.34 and 5.14]. This could be stated alongside the identified requirement for a more balanced distribution and a mix of tenures. Concerning the wider distribution of additional pitches and plots, mention could be made of local authorities working together to provide sites and using creative approaches to management and design. (*Replacement of existing paragraphs 3–5, and 17–20*).
- 7.35 We do not see any need to reiterate locational and sustainability criteria and guidance that is currently set out in the cited Circulars, and in particular in paragraph 54 of Circular 01/2006, and paragraphs 64-66 of Circular 04/2007 as well as in their respective Annex C's. While the existing supporting text is only intended as a checklist of important things to consider, there is no need to repeat national guidance. In addition, some of the matters listed are too site specific for consideration at a regional level and we suggest that they are reduced to their bare essentials with advice to users that they seek out the original sources. We consider that the useful points to retain relate to the less well known matters such as cultural factors, health, wellbeing and related care and support issues [para 7.24], and tenure. The advantages that arise from Councils being proactive in their engagement with the respective communities should also be highlighted. (*Replacement of existing paragraphs 8, 9 and 22 and most of paragraph 23*).
- 7.36 Those parts of the supporting text that relate to development in the Green Belt repeat Government advice in PPG2 Green Belts and in paragraphs 49–51 of Circular 01/2006 and paragraph 43 of Circular 04/2007 and could be omitted – a simple reference to

¹³¹ as requested by GONW

Government advice would suffice. *(Replacement of existing paragraphs 12 and much of 24).*

7.37 We also recommend common supporting text on delivery mechanisms [R8.1].

Gypsies and Travellers

7.38 After Policy L6, and relating specifically to Gypsies and Travellers there needs to be a section dealing with the provision of formal transit sites, as these are only dealt with summarily in Circular 01/2006. This could also give a brief mention of the informal temporary accommodation in connection with festivals and other annual events. No reliance should be placed on “tolerated” stopping places as these would not have planning permission. *(Broadly a replacement of existing paragraphs 6 and 7 and part of paragraph 13).*

7.39 We agree that diversity is an important consideration to highlight and that it may not always be appropriate to provide all one district’s provision on one site or in one locality. This needs to be made clear in the supporting text *(as currently set out in paragraph 8).*

7.40 Because rural exceptions sites are pertinent to Gypsies and Travellers, a brief cross-reference to PPS3 and Circular 01/2006 paragraphs 47-48 would be appropriate. We do not consider it necessary to say anything about business uses for Gypsies and Travellers, as at this is clearly explained in Circular 01/2006 paragraph 56. *(Replacement of existing paragraphs 10-11).*

Travelling Showpeople

7.41 The lifestyle of Travelling Showpeople, the existing situation and their needs should be covered. The reference to the mixed residential/ commercial nature of their sites is worth retaining as it sets a useful context and explains some of the difficulties in finding appropriate sites. There also needs to be a reference to the avoidance of site-splitting. Care needs to be taken, however, to avoid unnecessarily repeating too much of the Preface to Circular 04/2007. The reference to winter quarters should be deleted as it is now common for some Travelling Showpeople to remain on their plots all year round due to age, ill health or to enable children to attend local schools, and this point is well made in the Circular. *(Replacement of existing paragraph 16 and part of 20).*

7.42 We have recommended that the need for temporary stopping places be removed from the draft Policy [R5.2] and consider that reference should be made in the supporting text to an informal network of temporary accommodation. Reference could also be made to the temporary use of the yards of other Travelling Showpeople provided sufficient additional yards are provided. *(Replacement of parts of paragraph 20).*

7.43 The concept of rural exception sites does not extend to Travelling Showpeople as their use is not wholly residential. The possibility of finding appropriate former commercial sites in the countryside, such as former depots with good road access suitable for HGV traffic, needs to be considered as such sites can be ideal for mixed uses of this type [para 7.27]. *(Replacement of existing paragraph 23).*

Recommendation 7.5

Restructure and simplify the supporting text to give a common introduction to both Policies L6 and L7, with specific points relevant to only Gypsies and Travellers following Policy L6 and those relevant only to Travelling Showpeople following Policy L7 [see also R2.3, 4.5 and 8.1] [paras 7.33-7.43].

Not issued

8 DELIVERY OF SITES, MONITORING AND REVIEW

Matters 2.3, 3.4, 4.5, & 5.3

This chapter examines whether the means to ensure the delivery of pitches and plots are robust and achievable. It also looks at whether the monitoring of provision can reasonably be carried out and how the process should be subsequently reviewed.

DELIVERY MECHANISMS

- 8.1 The North West Plan makes it clear that the responsibility for delivery of pitches and plots rests with the local authorities. Their main tools through the planning system are the use of development control powers and through LDDs, and using housing powers in providing sites for social renting through an RSL. Sites may also be provided by Gypsies and Travellers and Travelling Showpeople themselves; Circular 01/2006¹³² particularly mentions that many Gypsies and Travellers wish to find and buy their own sites to develop and manage. At the Examination the representative of the Travelling Showpeople made it clear that if suitable sites became available they would wish to buy and develop the sites themselves where possible.
- 8.2 There are a number of different mechanisms that can be used. Circulars 01/2006¹³³ and 04/2007¹³⁴ list a number of ways in which local authorities can identify specific sites and make land available. Other mechanisms that can be used include joint partnerships with Gypsies and Travellers and Travelling Showpeople to develop sites with, for example, the authority providing the land and the partner providing the infrastructure. Local authorities may also grant planning permissions for tolerated sites or promote sites through major commercial and residential development schemes. Gypsies and Travellers and Travelling Showpeople may find and acquire their own sites; the Circulars encourage dialogue with local authorities first. The local authorities may also make use of the transitional arrangements to grant temporary planning permissions in advance of DPDs; again, the way this can be done is set out in the Circulars. At the Examination we were told of the accepted encampment at Ellesmere Port [para 3.48] which is being used as a site as a temporary measure in advance of permanent accommodation.
- 8.3 These methods are well set out in Government advice and do not need to be repeated in the North West Plan. However, progress thus far since the GTAAs were published has been patchy with many local authorities having made little or no additional provision in the years since the GTAAs were published. There will need to be a very great change in the rate of progress if the targets set out in the draft Policies are to be met.
- 8.4 We were impressed that the AGMA authorities have established a co-ordinating group led by Rochdale BC. Their work has included translating the GTAA findings into housing strategies, and assisting Gypsies and Travellers purchase land, and build their own facilities.

¹³² Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites, para 13, CLG, Feb 2006, (GT2)

¹³³ Circular 01/2006, para 35 (GT2)

¹³⁴ Circular 04/2007 Planning for Travelling Showpeople, para 29, CLG, Aug 2007 (TS1)

FUNDING

Gypsies and Travellers

- 8.5 The main issue concerning deliverability that was raised in representations and in debate concerned funding. It is clear that in this period of financial restraint judicious use will need to be made of all the various means of delivery. 4NW has made it plain that the RSS is seen to be tenure-neutral; it does not matter who provides the sites as long as they come on stream with a sufficient degree of urgency to meet the identified backlog. This is reflected in the draft Policy which makes no reference to this other than requiring a range of sites and tenures.
- 8.6 At the Data Meeting the Homes and Communities Agency (HCA) advised that the likely grant funding that would be available in the next financial year would be in the order of £2 million for the North West region, together with a potential share of the previous underspend in this region and nationally. This is similar to the sum that has been available in recent years¹³⁵. However it is notable that the successful bids have mainly comprised refurbishment schemes. In 2009/10 only a little over £1.8 million of the £2 million available was successfully bid for. In the 4-year period from 2006-2010, when some £5.8 million was available, there were 13 successful bids involving a total of 29 new residential pitches (2 temporary) and 21 short-stay pitches¹³⁶. On our familiarisation tour (autumn 2009) we observed that construction work had started on 15 of these new pitches in Carlisle.
- 8.7 However, as such a substantial portion of the grant aid has been spent on refurbishment, in 4 years only 52 new pitches have been funded. As submitted draft Policy L6 requires 1,095 new pitches, including transit pitches, by 2016, it is clear that it has never been the intention that HCA funding, on its own, would be sufficient to meet all the needs. This was emphasised by GONW at the Examination sessions. It is also clear that greater use of this funding will have to be made for the provision of new sites rather than for refurbishment schemes.
- 8.8 It is therefore imperative that alternative ways of funding pitch provision will have to be investigated. The provision of some pitches will doubtless be funded by Gypsies and Travellers themselves, but they will need assistance in finding suitable land to purchase. Some other options are set out in paragraph 35 of Circular 01/2006 and involve local authorities and other public bodies making use of their own unused and underused land or using Compulsory Purchase Order (CPO) powers. GONW pointed out the benefits of the “spend to save” approach; when more public money is spent on providing sites the likelihood is that less needs to be spent on maintenance, cleanup and enforcement proceedings in respect of unauthorised encampments. There are also the social and economic benefits of authorised sites that need to be taken into account.
- 8.9 At the Examination ICCM highlighted the need for joint working and flexible approaches to funding. We would fully endorse that approach. We hope that local authorities will take a proactive approach towards site funding and provision. It has been shown that innovative ways of developing sites can work.
- 8.10 Concerning transit sites, we would expect some groups of local authorities to work together to provide a network of sites, possibly on a sub-regional basis. The allocation of 5 pitches each for most of the districts would result in a large number of small sites; a

¹³⁵ Note on HCA funding allocation 2009/10, GONW, 24 Feb 2010 (DM20A)

¹³⁶ 4NW Briefing Note on Gypsy and Traveller Site Grants and Delivery Mechanisms, 4NW, 14 Jan 2010 (DM10)

lesser number of larger sites could be equally effective and, with joint working, the costs of providing sites and subsequent on-site management can be shared.

- 8.11 We also consider that there is long-term potential for funding to be achieved through major site developments as part of negotiated developer contributions to affordable housing¹³⁷. This could provide sites for Gypsies and Travellers that would accord with other locational and social objectives as set out in Circular 01/2006.
- 8.12 AGMA stressed in debate that its constituent authorities wanted a strong regional policy framework so that they were not tripped up in having any subsequent DPDs found to be unsound, particularly in relation to deliverability. We acknowledge that the Circular 01/2006 (with a similar provision for Travelling Showpeople in Circular 04/2007) says that site allocation DPDs will need to show how land will be made available and the timescales for provision. However we also note that they only require such DPDs to show "*a realistic likelihood*" that specific sites allocated will be made available for that purpose¹³⁸. We do not therefore consider that this should be a constraint in moving forward.
- 8.13 Overall we consider that the main challenge will be in the identification of suitable affordable sites that can be developed at reasonable cost. While we acknowledge that public funding will be limited, there is nonetheless a wide range of funding options that need to be explored. The Gypsies and Travellers themselves need to be fully involved throughout this process.

Travelling Showpeople

- 8.14 The Showmen's Guild has stated that if land can be found, its members will wherever possible fund the necessary development. The Guild indicated that it was prepared to consider joint working and funding or lease-back from the local authority. However, self-funding is the preferred option with sites ultimately owned by the Travelling Showpeople themselves.
- 8.15 We again consider that there is long-term potential for sites to be found and funding to be achieved through major site developments. Mixed use schemes and commercial developments could provide sites for Travelling Showpeople where their mix of maintenance, storage and residential uses could satisfactorily be accommodated.
- 8.16 As with Gypsies and Travellers, we again consider that the main challenge will be in the identification of suitable affordable sites that can be developed at reasonable cost. The Guild has indicated that Travelling Showpeople are ready and willing to use any funding option available but that self-funding is a viable option. Again, engagement with the Showmen's Guild throughout the process is essential.

Supporting text on delivery and funding

- 8.17 Paragraph 13 in support of draft Policy L6 and paragraph 25 for draft Policy L7 summarise the role of the public sector and self-help in delivering the new pitches and plots required. We recommend that this is expanded to encourage exploration of a wider range of funding options to ensure delivery, including grant funding from the HCA and private sector provision part-funded by the innovative use of grant aid¹³⁹. A

¹³⁷ Designing Gypsy and Traveller Sites: Good Practice Guide, para 3.7, CLG and the Housing Corporation, May 2008 (GT10)

¹³⁸ Circular 01/2006, para 33 and Circular 04/2007, para 28

¹³⁹ Gypsy and Traveller Sites Grant Guidance 2008-2011, paras 18-20, CLG, March 2008 (GT8)

cross-reference could also be made to the ways in which local authorities can make land available as set out in the 2 Circulars¹⁴⁰.

Recommendation 8.1

Strengthen the supporting text on delivery mechanisms in our suggested common introduction to Policies L6 and L7 [para 8.17].

MONITORING

- 8.18 There is currently no mention of monitoring in the supporting text to either draft Policy L6 or L7, although we appreciate that monitoring mechanisms covering all topics are set out in the North West Plan, Chapter 14. 4NW's most recent 2 Annual Monitoring Reports already measure progress against the national core indicator of net additional pitches for Gypsies and Travellers¹⁴¹. Information is given separately for Gypsy and Traveller pitches, transit pitches and Travelling Showpeople plots¹⁴².
- 8.19 4NW advised strongly against adding any new indicators given pressures on staff and financial resources at both local and regional level, and due to concerns that if demands are too onerous then the response rates may fall. While appreciating these constraints we consider, like FFT, that there is a strong case for separating out any new pitches constructed that are only on temporary planning permissions. At our instigation recent information was assembled¹⁴³, on this basis for the Data Meeting and we recommend there would be benefits in carrying this forward in view of the concerns expressed in the national progress report¹⁴⁴, and to avoid gaining a false view of progress towards achieving permanent provision levels in Tables 7.2 and 7.3. Mollington PC also strongly argued that sites with temporary permissions should not count towards achieving the required provision figures.
- 8.20 It was also apparent from the Data Meeting that site management issues can be a major reason for pitches or plots being unavailable either in the short or longer term. This was a particular issue for example in Trafford on a large Gypsy and Traveller site, and in Hyndburn on a Travelling Showpeople site. We agree with GONW that it would be useful for this effect to be better understood, and we therefore recommend that 4NW invite local authorities to include any relevant observations or warnings in the Additional Comments section of their monitoring form.
- 8.21 It would also be worth advising local authorities in the monitoring guidance notes that pitches personal to the occupier should be counted (unless they are on a temporary permission). The assumption here is that there would generally be other family members or associates ready to take over the pitch subject to modifying the planning condition.
- 8.22 We do not consider it feasible for affordable pitches to be monitored as FFT requested. Although it would be easy to record pitches on local authority or RSL sites, it would be difficult to separate out such information on private sites. We also consider that 4NW

¹⁴⁰ Circular 01/2006, para 35 and Circular 04/2007, para 29

¹⁴¹ RSS and LDF: Core Output Indicators – Update 2/2008, Indicator H4, CLG, July 2008 (PD11). This measures the difference between pitches constructed and pitches lost

¹⁴² RSS Annual Monitoring Report for the North West, Indicator 3.17, 4NW, Feb 2009 (RSS3) and RSS Annual Monitoring Report for the North West, Indicator 3.14, 4NW, Feb 2010 (RSS4)

¹⁴³ Current authorised provision (Gypsy and Traveller pitches) in 2007, 4NW, 25 Jan 2010 (DM23)

¹⁴⁴ Progress Report on Gypsy and Traveller Policy, paras 29 and 30, CLG, July 2009 (GT12)

will have other ways of keeping track of local authority progress on the adoption of relevant policies in core strategies and the preparation of site allocation DPDs.

- 8.23 GONW considered that monitoring would be more effective if it were measuring progress towards achieving a 5-year provision target rather than one relating to 2007-2016. As discussed in paras 2.32–2.33, we do not think that this is realistic.
- 8.24 4NW accepted that it would continue to have a monitoring function in the new system of single Regional Strategies, and it will be relooking at its current suite of indicators. We strongly encourage them to continue monitoring the net change in pitches provided. If the current system is dismantled, monitoring could be continued on a voluntary basis by each sub-regional partnership.

In process terms:

Recommendation 8.2

Separate out any new pitches or plots on temporary permissions when monitoring performance against the requirements in Tables 7.2 and 7.3 [para 8.19].

In process terms:

Recommendation 8.3

Invite local authorities to include any observations on management issues affecting the availability of pitches or plots in submitting their annual monitoring returns [para 8.20].

REVIEW PROCESS

- 8.25 The process intended by both draft Policies L6 and L7 is that a subsequent review of pitch and plot provision figures will be based on a co-ordinated review of sub-regional GTAAs and that this evidence should be available by 2013.
- 8.26 Some local authorities argued that they should be able to take account of any updated GTAAs that were completed in advance of this date. In particular Cheshire West and Chester Council indicated that the authorities in the Cheshire sub-regional partnership hope to initiate their work on an updated GTAA in 2011.
- 8.27 We envisage 2 risks with local authorities unilaterally being able to base their LDFs on revised figures from an updated GTAA:
- that the effect of any redistribution achieved through this RSS is lost as local authorities with few if any resident Gypsies and Travellers or Travelling Showpeople use the updated need where need arises based figures;
 - that any increase in needs would not necessarily be incorporated because local authorities with high resident Gypsies and Travellers or Travelling Showpeople populations would be unable on their own to reach agreement with other authorities in that sub-region to share any of this increase.
- 8.28 Even if authorities were able to reach a sharing agreement it would only be within that sub-region. We are therefore convinced that the only way that a higher level view can be taken of the case for redistributing needs is through a co-ordinated review at the regional level.
- 8.29 4NW has brought an impartiality to such decisions in this Partial Review using evidence from the GTAAs conducted over a 2-year period 2007-2008. As things have

turned out, it has resulted in no redistribution of Gypsy and Traveller pitches between sub-regions, although more significant redistribution of Travelling Showpeople plots. It cannot be anticipated at this stage whether a greater degree of redistribution between sub-regions may be appropriate or not in a future review [see paras 3.21 and 6.28], but it is clear that the review process set out in both policies would allow objective decisions to be taken.

- 8.30 Given that the legal framework for single Regional Strategies has only commenced at the beginning of April 2010, quite apart from any other uncertainties associated with the forthcoming general election, we would not expect 4NW to be able to commit to a date at which these policies might be reviewed. Setting a target date by which a further round of GTAAs should be completed is a pragmatic approach in the circumstances.
- 8.31 We therefore fully endorse the existing policy wording in order to allow the Responsible Regional Authorities (4NW and NWDA) to take a strategic view of the findings of these updated GTAAs at their next review of Policies L6 and L7.

Not issued

PART B: REGIONAL PARKING STANDARDS

9 OVERALL APPROACH TO PARKING STANDARDS

Matter 1

This chapter examines the policy context within which the parking standards sit, and how the proposed Partial Review guidance has been developed based on technical background work carried out by Mouchel. It then considers the case for retaining the parking standards within the North West Plan.

POLICY RT2

Existing policy

- 9.1 The North West Plan includes a policy requirement for plans and strategies at a more local level to incorporate maximum parking standards *in line with, or more restrictive than*, those set out at the regional scale. The standards specified have apparently remained unchanged since the earlier Regional Planning Guidance (RPG13) in 2003. The numerical standards are similar to the national maximum standards set out in PPG13, Annex D, although a tighter version of the standards is specified for use in "urban" areas, and there is no lower threshold set.
- 9.2 These maximum parking standards are one part of a policy on managing travel demand (Policy RT2). This correctly, in our view, sees parking in terms of charging and controls as well as standards, and as part of a package approach involving both spatial planning policies e.g. locating major developments in areas accessible by modes other than the car, and transport planning measures such as reallocating road space in favour of public transport, cyclists and pedestrians, and incentives to change travel behaviour. The whole policy is therefore firmly rooted in the smarter choices and active travel agendas that have become more high profile over recent years with increasing national awareness of the need to reduce carbon emissions. We had the opportunity to understand this broader context at the Data Meeting through a paper prepared by 4NW at our request¹⁴⁵.

4NW's proposed revisions

- 9.3 This Partial Review proposes:
- amendments to that part of Policy RT2 dealing with parking standards (the last bullet point);
 - new supporting text (paragraphs 28-31) to replace paragraph 8.8;
 - wholesale replacement of the standards table (Table 8.1); and
 - the addition of a new appendix (Appendix 1) which we assume is designed to replace Appendix RT(d) of the North West Plan, in whole or in part¹⁴⁶.
- 9.4 The draft revisions to Policy RT2 are based on technical work by Mouchel in 2007¹⁴⁷, followed by policy development work and formal public consultation in 2008 and early 2009. Two policy options were canvassed at the issues and options stage:

¹⁴⁵ Technical Background Paper – Regional Parking Standards, 4NW, Jan 2010 (DM14)

¹⁴⁶ It is unclear whether 4NW intend section 6 on Strategic Park and Ride facilities and section 7 Design Considerations to remain

- Option 1: retain existing standards
 - Option 2: adopt revised standards as proposed in the consultant's report.
- 9.5 The consultation response revealed a preference for Option 2¹⁴⁸. However we are surprised at the way that Option 1 was described in the consultation questions, namely that it would fail to meet the commitment in RPG13 to review parking standards every 5 years¹⁴⁹. To our mind 'review' does not automatically mean 'amend' – sometimes there can be good reasons for policy stability!
- 9.6 A more cogent reason by which those local authorities involved in the Mouchel study favoured change was a desire to link parking provision to accessibility, the understanding and measurement capabilities of which had increased during the LTP2 process¹⁵⁰. The premise here is that however sophisticated a sub-division of the region based on settlement pattern, scope would still exist for considerable variation in the accessibility of individual development sites depending on such things as proximity to bus stops or train stations.
- 9.7 In setting guidance on the development of a methodology which took account of variations in accessibility, Appendix RT(d) of the North West Plan envisages developing a "matrix" of standards dependent on the 3 factors of land-use, location and accessibility levels. We note that this matrix structure has been achieved over the years in the London Plan because of the existence of a public transport accessibility level (PTAL) map covering the whole of London.
- 9.8 Without this form of mapping, and given the inherent difficulties of presenting a 3D matrix, 4NW and its advisers have proposed through this Partial Review, what Cumbria CC described as, a 2 staged process. This relies on:
- first, using Table 8.1 as a look up table for the relevant maximum parking standard for a development proposal falling into a given Area Accessibility Category (AAC) (having first sub-divided the region accordingly); and
 - secondly, applying the total score from an Accessibility Questionnaire (AQ) (having first defined this for each sub-region) as a way of reducing the parking standard down from the maximum, if that development site is in a very accessible part of the AAC.

CASE FOR REGIONAL PARKING STANDARDS

- 9.9 Before testing the detail of the proposed revisions to Policy RT2, we consider here the case for retaining parking standards in the North West Plan. We do this on the basis that national policy has become less prescriptive on parking standards since RPG13 was adopted, and that the most recent national statement barely acknowledges regional standards while setting out 12 criteria that should be taken into account by local authorities in setting their standards¹⁵¹.
- 9.10 On the basis of the Data Meeting discussions, the debates and the background documentation, we are persuaded that there is a good case for retaining a system of

¹⁴⁷ Review of Regional Parking Standards Executive Summary, Mouchel for the NWRA, Dec 2008 (RP2)

¹⁴⁸ 22 responses in agreement and 9 in part agreement out of 39 responses, Consultation on the Draft Options: Gypsies, Travellers and Travelling Showpeople, section 2.1, CAG Consultants for the NWRA, July 2008 (PRE25)

¹⁴⁹ Car Parking Options Paper, CAG Consultants for the NWRA, June 2008 (PRE28A)

¹⁵⁰ as explained by Rossendale BC at the Data Meeting

¹⁵¹ PPS4 Planning for Sustainable Economic Growth, Policies EC8.1 and EC8.2, CLG, Dec 2009

regional parking standards in this region. Our conclusion is based on the following reasons:

- Co-ordinated parking standards would complement Policy RDF1 (Spatial Priorities), which seeks to influence the location of new development towards those areas most accessible via all means of transport through a sequential approach, starting with the regional centres of Manchester and Liverpool. (This is on the assumption that the risk of introducing any perverse incentive towards development at out-of-town locations can be mitigated¹⁵²).
- Parking standards are an important part of the toolkit in the congested areas of Greater Manchester and Merseyside in seeking to manage travel demand and promote sustainable alternatives to the car. The Highways Agency agreed in debate that there was study evidence that restricting the availability of car parking particularly at the workplace end, if there are other public transport alternatives, can influence travel choices¹⁵³.
- Standards based on AACs, objectively defined rather than following local authority boundaries, have the potential to assist demand management and sustainable travel choices across the wider city regions which are the basis of sub-regional policies in the North West Plan.
- There is a legacy of co-ordinated standards in the Lancashire sub-region and several participants from Lancashire authorities identified that a policy vacuum has been created by the abolition of the Joint Lancashire Structure Plan¹⁵⁴ and its Supplementary Planning Guidance on access and parking¹⁵⁵.
- On the basis that parking standards set out at the regional level can avoid competition between different locations¹⁵⁶, as agreed by GONW and Highways Agency in debate, there is further scope for improving the consistency of local standards across the North West in several land use categories where investment is mobile. Data collected in the Mouchel study showed that in 2007 the number of authorities with local standards less strict than the then regional standards in RPG13 was 12 for Higher Education Institutes (HEI), 9 for cinemas and conference facilities, and 2 for business parks. There were even higher numbers of authorities with no standards in these categories: 16, 13 and 12 respectively¹⁵⁷.
- The amount of large-scale development permitted contrary to the existing regional standards has been relatively small over the last 4 monitoring periods at around 20%¹⁵⁸. This suggests a willingness on the part of local authorities generally to abide by regionally defined standards, a willingness that was also apparent in the debates themselves.

¹⁵² An example of flexibility for retail developments in or on the edge of a town centre is given in PPG13 Transport, para 56, ODPM, March 2001

¹⁵³ This is also stated in PPG13 Transport, para 49 and PPS11 Regional Spatial Strategies, Annex B, para 35, ODPM, Sept 2004

¹⁵⁴ Joint Lancashire Structure Plan Technical Appendix 2 Parking Standards, Lancashire CC, March 2005 (RP3)

¹⁵⁵ Joint Lancashire Structure Plan SPG Access and Parking, Lancashire CC, March 2005 (RP4)

¹⁵⁶ PPG13 Transport, para 50

¹⁵⁷ Review of Regional Parking Standards Final Report, Table 4.4, Mouchel for the NWRA, Dec 2008 (RP2)

¹⁵⁸ RSS Annual Monitoring Report for the North West, 4NW, Feb 2009 (RSS3) gives compliance rates of 21.4% in 2005/06, 81.4% in 2006/07, 78.9% in 2007/08. RSS Annual Monitoring Report for the North West, 4NW, Feb 2010 (RSS4) gives a compliance rate of 77% in 2008/09. All figures relate to non-residential development with a minimum gross floorspace of 1,000 sqm or above

9.11 Nevertheless the support that we have expressed in principle for retaining coordinated parking standards¹⁵⁹ in this region is contingent upon finding a formulation which:

- can be applied relatively simply;
- is clear and fair to all users; and
- does not risk deterring economic development in regeneration and rural areas.

9.12 These criteria have underlain our testing of the revised policy proposals in the following chapters.

Not issued

¹⁵⁹ Although there was no discussion on electric vehicles at the Examination, we envisage that 4NW and NWDA and local authority groupings will in future be considering the parking requirements arising

10 NON-RESIDENTIAL DEVELOPMENT CAR PARKING STANDARDS

Matter 1.2

This chapter examines the case for including parking standards in Table 8.1 for a wider range of land use categories, and their appropriateness in different locational contexts.

Recommendations are provided for additional comments and footnotes to be added to Table 8.1 on specific included and excluded land use categories. These are shown in a skeleton version of Table 8.1 in Appendix A of this Panel report.

THE PRINCIPLES OF TABLE 8.1

10.1 Compared to the version in the North West Plan, the replacement Table 8.1 in the Partial Review covers:

- a wider range of land use categories, including residential;
- a more detailed sub-division of the region including 3 Area Accessibility Categories (AACs);
- the land uses to which the proposed Accessibility Questionnaire (AQ) should be applied;
- minimum standards for disabled people's vehicles, for bicycles and motorcycles, differentiated by land use categories;
- standards for coach parking for some land use categories, and
- explanatory comments and considerations for developers in formulating their proposals and local authorities in determining planning applications.

10.2 This chapter gives our conclusions on the car parking standards proposed for individual land use categories together with any associated comments, considerations and footnotes. Our analysis of the parking standards for modes other than the car included in Table 8.1 is given in Chapter 13.

Degree of comprehensiveness

10.3 This Partial Review:

- introduces 6 new land use categories to Table 8.1¹⁶⁰ (A1 retail warehouses, A2 financial and professional services, A4 drinking establishments, B1 call centres, C2 residential institutions, and miscellaneous uses divided into 3 categories);
- includes new sub-divisions of D1 non-residential use (creches, schools, art galleries, places of worship); and
- compresses one previous subdivision of B1 to include both single offices and business parks. Research and Development is also now specifically mentioned in this category.

10.4 The revised Table 8.1 introduces a level of detail which on first sight may appear out of place in a regional planning document. We were initially sceptical about this degree of detail. But we have become convinced of the benefits of being more comprehensive in this region for the general reasons given in para 9.10. More specifically we consider

¹⁶⁰ in addition to C3 dwelling houses which is the subject of Chapter 12

there are advantages in Table 8.1 being as self-contained as possible so that local planning authorities can cross-refer to it without the need to repeat these standards in their LDFs. This will give certainty to developers, negotiating strength to those local authority staff involved in the development management process, and fill the policy vacuum left on co-ordinated parking standards by the abolition of structure plans.

- 10.5 We therefore accept the principle of Table 8.1 containing a broader range of land uses. However it is unlikely that any such table could ever be totally comprehensive, and the issue for us is where to draw the line on the inclusion of local service uses.

Degree of restriction

- 10.6 Two main concerns were raised in debate on any tightening of standards from those set out in the North West Plan:

- perceived effects on economic investment; and
- risk of 'fly parking', i.e. parking from new development overspilling into neighbouring areas.

- 10.7 East Lancashire Chamber of Commerce was convinced that economic investment particularly in much-needed modern office stock in Pennine Lancashire would be deterred through the proposed standards. It sought to make an economic case that such restrictive standards would reduce the ability to modernise the area's service sector economy. Cumbria CC was also concerned that over restrictive standards would deter investment in businesses and risk losing retail trade in their key service centres without adequate public transport alternatives. Its concerns related particularly to the displacement of activity away from town centres in Area Accessibility Category B.

- 10.8 We have some sympathy with these concerns and consider that a 'special consideration' originally noted in the Mouchel report¹⁶¹ appears to have been lost in the submitted draft. We also note the recent statement in PPS4 promoting small scale economic development in rural areas which recognises that a site may be an acceptable location to development even though it may not be readily accessible by public transport¹⁶². We therefore recommend that the economic consequences of parking levels in regeneration and rural areas should be acknowledged in the Comments column under B1 uses¹⁶³.

- 10.9 Trafford Council objected in principle to any further tightening of standards because of its fear of fly parking. It acknowledged that such risks could be mitigated by introducing more controlled parking zones, but it was concerned about the financial and staff resource implications of this, including for ongoing enforcement. We have considered these risks in responding to objections raised on specific land use categories. In general we have paid particular attention to the cases where parties have argued that the proposed standards are too restrictive. As they are maximum standards it is therefore more difficult for individual local authorities to include more generous standards in their LDFs, although more generous parking could be allowed in determining individual proposals if the particular circumstances of the location and development merited it.

¹⁶¹ No reductions in parking levels as a result of the Accessibility Questionnaire were intended in economically deprived areas, Mouchel report, p83 Dec 2008 (RP2)

¹⁶² PPS4 Planning for Sustainable Economic Growth, Policy EC12, CLG, Dec 2009

¹⁶³ There is no need to include this comment under B1 call centres because levels given here are only a starting point

10.10 However most of our recommendations in response to specific objections, including where it was argued that the proposed standards are too generous, involve adding additional comments to the Table. The Panel does not have an evidence base on which to suggest a change to actual figures. Even where we received suggested numbers for revised standards, it would be wrong for us to recommend these precise figures without being able to test their suitability in different geographic contexts throughout the region.

NUMERICAL STANDARDS IN TABLE 8.1

Included land use categories

10.11 There was relatively little objection to the detail of Table 8.1 in representations to the submitted draft version, compared to the more substantive concerns discussed on the AACs and the AQ in Chapter 11. Although 39% of respondents were said to have objected to the figures in Table 8.1, this only represented 9 organisations¹⁶⁴. Having considered the arguments advanced, we make observations and recommendations on the following land use categories. Our recommendations in each case are set out as changes to Table 8.1 in Appendix A of this Panel report.

A1 Shops

10.12 We agree with Preston City Council that the guidance on small non-food retail units in the Comments column could also apply to launderettes, and that this use should therefore be mentioned. We also agree with authorities in Preston, Halton and Trafford that a definition of retail warehouses should be included, together with recognition that DIY stores may need overflow provision at peak times.

A2 – A4 Professional offices and catering outlets

10.13 We agree with Preston City Council that the reference to considering charging for parking in all major "retail" developments including out-of-town in the first Considerations column appears to be a typing error and therefore that the word "*retail*" should be deleted.

B8 Storage and distribution

10.14 We accept the concerns of the Greater Manchester Chamber of Commerce that the proposed standards may be too generous for highly automated distribution hubs with fewer staff. Further research may well be needed on this issue, a point also made by Cheshire East Council¹⁶⁵, but in the meantime the additional comment that we recommend be added to the Table would suffice.

C2 Residential institutions

10.15 At the Data Meeting 4NW drew attention to a transposition error on both C2 categories, where standards quoted for Area Accessibility Category C should have related to Area A, and vice versa. Needless to say we recommend that this error is corrected.

10.16 We do not consider that any specific provision should be included for staff, as requested by Trafford Council. The recognition of the need to consider this issue appears to us to

¹⁶⁴ Consultation on Interim Draft Policies: Car Parking, CAG Consultants for the NWRA, March 2009 (PRE8)

¹⁶⁵ Representation 62

be sufficiently implicit in the existing guidance note already in the Comments column. We do however recognise the need to take account of the implications that older people now have greater mobility by car for longer.

D1 Non-residential institutions

10.17 These local service uses attracted a range of comments, from an assertion that they were too tight and should have made an allowance for visitor parking, and in respect of creches and schools for non-teaching staff (Trafford Council), to an assertion that they were too generous (Preston City Council for all D1 uses, and Halton BC for places of worship).

10.18 We do not recommend any specific changes here, although recognising that more complex trip patterns that have resulted through the introduction of the choices agenda in education. We therefore support the specific mention that drop-off spaces should be determined on a case-by-case basis.

D1 Higher and further education (HEI)

10.19 We accept that HEI expansion, including into part-time vocational training, has made parking an issue in several parts of the region including central Lancashire and Manchester. We accept that standards should be based on staff (including non-teaching staff) and the total student headcount for consistency with PPG13¹⁶⁶. The particular standards suggested for students, i.e consistent with the national maximum standards in PPG13 for Area Accessibility Category B, and more generous for Area C (with none for Area A), appear reasonable to us. We make no comment on particular parking management issues arising at the Edge Hill campus, as raised by both West Lancashire BC and CPRE. Given the need to manage demand at HEIs, we also agree with AGMA that it would be sensible for the final column to emphasise that travel plans should include staff as well as students.

10.20 Linked to the expansion of HEIs has been an increase in purpose-built student accommodation. Preston City Council and West Lancashire BC noted issues arising and made suggestions for new numerical standards. 4NW accepted in debate that this land use category should be included in the Table. We recommend accordingly and leave it to propose precise numbers taking account of experience in this region, including in the Lancashire local authorities of operating their previous Joint Structure Plan standard.

D2 Assembly and leisure

10.21 Trafford Council identified the diversity of uses in these 2 sub-divisions carried forward from the adopted North West Plan, and the imprecise detail that may be available at the application stage. Trafford Council use a different subdivision of land use category D2¹⁶⁷, but we do not have evidence of its suitability throughout the region to suggest its wider use. However, in our view, if seating capacity for cinemas etc is not known at the application stage it seems reasonable that an area-based ratio should be capable of being used as set out for the general leisure category. We recommend this flexibility is noted in the Comments column.

¹⁶⁶ PPG13 Transport, Annex D, footnote 1, ODPM, March 2001

¹⁶⁷ Letter from Trafford Council on parking standards for motor car showrooms and other parking standards, March 2010 (PD13)

Miscellaneous uses

10.22 Trafford Council note the tendency for the internal part of car showrooms to be reducing in proportion to the external display space and hence its concern that the proposed standards are too tight. As no other party expressed this concern and because a degree of flexibility may exist for showroom operators to accommodate more customer parking on their display space at busy periods, we do not suggest any changes.

10.23 Merseyside Transport Partnership and Halton BC both considered the proposed standard at petrol filling stations of one space per pump to be too generous, given 4NW's clarification at the Data Meeting that this is intended to be in addition to parking at the pump. Instinctively we sympathise with this argument given that the Comments column says that ancillary retail should be assessed separately. As tighter standards can be set particularly in urban areas to reflect this consideration, we do not suggest any changes.

Recommendation 10.1

Correct the transposition error between Area Accessibility Categories A and C for both C2 Residential institutions categories [para 10.15], and the typing error in the first Considerations column for A2-A4 [para 10.13]

Recommendation 10.2

Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A for A1 Non-food retail [para 10.12], A1 Retail warehouses [para 10.12], B1 Office, business parks, and R&D [para 10.8], B8 Storage and distribution [para 10.14], D1 Higher and further education [para 10.19], and D2 Cinemas etc [para 10.21].

Excluded categories

10.24 Based on the findings of the Mouchel study, around 10 land uses are specifically excluded from Table 8.1. These comprise:

- uses unlikely to generate significant parking demands because they are often associated with town and city centre locations; and
- uses where applications will only come forward rarely¹⁶⁸.

10.25 Within the first category, A5 fast food take-aways were acknowledged to cause widespread parking problems particularly involving reuse of existing premises along busy roads. A case for reinstatement of this use which is currently in the North West Plan was made by Merseyside Transport Partnership, Trafford Council and Preston City Council. The latter feared that its non-inclusion would weaken the negotiating position of their development controllers. While understanding the congestion issues caused by casual parking on the roadside, such uses are often along high streets where use of shared parking may be possible and new dedicated parking difficult to accommodate. We therefore recommend that the use is included in Table 8.1 using the existing guidance already given in Appendix 1 of the Partial Review to use A3 standards as a starting point.

¹⁶⁸ as explained in the Partial Review, Appendix 1, para IX

- 10.26 We have already supported the case for the addition of student halls of residence to Table 8.1 [para 10.20]. We have included this as a separate category under C2 residential institutions in our recommended changes in Appendix A of this report.
- 10.27 Within the second category, the only use that is currently in the North West Plan but not included in Table 8.1 is stadia. Due to the diversity of locations in which stadia proposals can come forward and the mix of associated uses they can contain, we consider that the existence of a maximum national standard in PPG13, Appendix D is sufficient numerical guidance.
- 10.28 However for stadia and all the remaining excluded categories, we note that there is some positive guidance to local authorities either in developing their own local standards or dealing with particular applications in Appendix 1 of the submission draft policy document, paragraphs X and XI. We recommend that any such helpful assistance to local authorities is included in new footnotes to Table 8.1. This will ensure that it is not lost in a distant appendix and keeps all guidance on parking standards in one place. This will make it more accessible for developers who find themselves referred to the RSS standards as part of the development plan after consulting a given LDF core strategy. Other suggestions for amalgamating guidance on parking standards in one place are brought together at the end of Chapter 13 [para 13.31].
- 10.29 We have suggested a form of wording for these extra footnotes in Table 8.1 in Appendix A. However, because many users will consult these regional parking standards on-screen, we further suggest that those land use categories into which the excluded categories would fall (i.e. C2, D1, D2 and Miscellaneous) are asterisked in the first column.
- 10.30 4NW agreed in debate that there was a case for expanding guidance on hospitals. We would encourage it to do this given the widespread occurrence of hospitals throughout the region and the problems caused by insufficient parking. We do not consider that there is a case for including even more local uses, e.g. homes in multiple occupation as suggested by Trafford Council, in Table 8.1.

Recommendation 10.3

Add new land use categories to Table 8.1 for A5 Fast food outlets [para 10.25] and C2 Student halls of residence [para 10.20].

Recommendation 10.4

Add guidance on excluded categories as new footnotes to Table 8.1, as specified in our recommended changes in Appendix A [para 10.28].

Point of clarification

- 10.31 As discussed in debate, it is our understanding that any operational parking is intended to be additional¹⁶⁹ to standards set out in Table 8.1. Operational parking relates to provision for delivery and emergency vehicles or specific functional requirements e.g. vehicle queuing areas for ferries. We recommend that this is made clear in paragraph 28 of the supporting text [see also para 12.9].

¹⁶⁹ Mouchel report, pp72-73, Dec 2008 (RP2)

Recommendation 10.5

Clarify that operational parking is additional to the standards in Table 8.1 in paragraph 28 of the supporting text [para 10.31].

Not issued

11 ACCESSIBILITY CONSIDERATIONS: AREA CATEGORIES AND QUESTIONNAIRE

Matters 1.2, 1.3, 1.4 & 1.5

This chapter examines the proposed approach of using land use, location, and accessibility, as set out in the Area Accessibility Categories and the Accessibility Questionnaire, to further refine the parking standards. We make recommendations on clarifying the process by which Area Accessibility Categories should be defined, and for a simpler approach to replace the Accessibility Questionnaire.

GENERAL APPROACH ON ACCESSIBILITY

Introduction

- 11.1 The Mouchel¹⁷⁰ report considered that accessibility was a key theme in assessing the appropriateness of parking standards for specific developments. The report assessed accessibility and considered 4 options: uniform standards, location-based standards, accessibility-based standards, and a combined approach. The authors opted for the fourth option, a combined location/ accessibility approach and this has been adopted in the Partial Review.
- 11.2 The resultant proposed parking standards are based on a combined assessment of, first, the broad location of the proposed development, and secondly, the level of local accessibility. Draft Policy RT2 says that plans and strategies should, amongst other things, incorporate maximum parking standards and "*define areas where more restrictive standards should be applied*". Paragraph 29 of the supporting text identifies that a 2 staged approach has been developed to determine the quantity of parking provided at an individual site. Appendix 1 defines the proposed Area Accessibility Categories (AACs) which would be used in stage 1 and it provides an example of an Accessibility Questionnaire (AQ) which would be used at stage 2. The supporting text says that the AACs would apply across the region, albeit with their precise boundaries set at the sub-regional level. The AQs would be further developed, also at sub-regional level. At the Examination 4NW agreed that the wording of paragraph 29, at line 37, should refer to the sub-regional AQs being *based upon* the example rather than *adhering to* it.
- 11.3 We have no difficulty with the principle of using location and accessibility to inform the maximum parking standard. This would be a useful tool for both forward planning work and in development management. In forward planning it would enable the accessibility of individual sites to be compared to assist in coming to informed decisions on site allocations. In development management it would be a useful negotiating tool for officers and developers when looking at the development potential for an individual site.
- 11.4 We note that the proposed 2 staged approach is loosely based upon that set out in Appendix RT(d) of the North West Plan, which in turn is based on experience from Lancashire, as adopted in the Joint Lancashire Structure Plan in March 2005 and set out in their SPD¹⁷¹. The Lancashire approach divides their centres into 4 levels and includes a simple AQ which has a threshold of 500 square metres (sqm) gross floor area. We understand this to be straightforward to use and note that its use is supported by Lancashire local authorities.

¹⁷⁰ Review of Regional Parking Standards Final Report, pp36-43, Mouchel for the NWRA, Dec 2008 (RP2)

¹⁷¹ Joint Lancashire Structure Plan Appendix 2 Parking Standards, Lancashire CC, March 2005 (RP3)

- 11.5 However, we consider that the proposed 2 staged approach as set out in the Partial Review to be significantly more complicated and we have concluded that the second stage, local accessibility, is better left to the discretion of individual local authorities.
- 11.6 Concerning the principle of using accessibility as a tool in this way, it was noticeable at the Examination that local authorities generally supported the approach, albeit with some reservations about the practicability of its implementation, and that the representatives of industry were concerned that it was overly complicated and would result in an additional level of bureaucracy to be navigated before development could proceed.

AREA ACCESSIBILITY CATEGORIES

Principle and application

- 11.7 There was some concern from the private sector, in particular, about the principle of using AACs. The Greater Manchester Chamber of Commerce sought their removal as they would be unnecessarily complicated. The Chamber also raised concern about the ability of authorities to work together to ensure consistency across a conurbation. The Home Builders Federation (HBF) was concerned about potentially subjective judgements as to where the AAC boundaries would be drawn.
- 11.8 There were significant concerns from participants regarding consistency of application. GONW commented that to be effective the AACs needed to be clear, uncomplicated and resource efficient and to be consistently interpreted by local authorities. This concern about consistency was echoed by the Highways Agency and Warrington BC, the latter requesting that the AACs be made clearer by setting out the method by which areas within sub-regions would be categorised. Warrington BC considered that this should either be done by settlement type or level of accessibility. There was further concern about who would determine the AAC boundaries with Preston City Council objecting to this being carried out by sub-regions and arguing that it should be for local authorities to determine through the LDF process.
- 11.9 We also have concerns about the clarity of the implementation process. In order to be fair and effective, the AACs need to be implemented in a consistent way across the whole region. At present the North West Plan has 2 levels of standards for parking: regional and urban. These are not defined in the glossary (although “rural areas” are). Footnote 6 to Table 8.1 of the North West Plan says LDFs should identify the areas where regional and urban standards apply.
- 11.10 The difficulty in determining the AAC boundaries is highlighted by the process that was undergone to arrive at the 3 AACs now proposed. The Mouchel¹⁷² report initially identified a grading system of 8 levels of accessibility to take account of the differing levels between the metropolitan city centres and the remote rural areas of Cumbria. Fortunately this 8 level approach was deemed to be an overcomplicated system, while the 2 way sub-division of the region in the North West Plan, was deemed to be oversimplified. Mouchel developed 2 options, one with 4 categories and the other with 3. Their report argued that the AQ would allow for the assessment of accessibility at the local level, so the AACs needed to only provide for a broad assessment. The categories had to be broad enough to ensure no overlap with the second stage as this would lead to double discounting.

¹⁷² Mouchel report, pp36-43, Dec 2008 (RP2)

- 11.11 The option chosen by Mouchel, with 3 AACs, is based upon a locational, rather than level of accessibility, classification. In reality we consider it highly probable that the location based approach largely replicates accessibility. We accept this option as it is a reasonable compromise between a highly detailed multi-level approach, which we consider would be excessively complex and inappropriate at regional level, and the simple classification of the region into urban and other areas in existing policy.
- 11.12 There was uncertainty amongst participants at the Examination as to how the boundaries of the AACs would be identified and we consider that this needs to be addressed. 4NW confirmed that the boundaries would be “hard” (that is to say, precise lines on plans) and that the intention, as set out in paragraph 29 of the supporting text, was that it would be up to the sub-regions to determine the categories and their actual boundaries. AGMA queried whether the boundaries would follow established city and town centre boundaries or whether the boundaries would radiate out along the main transport routes. We do not see a problem with either approach as long as it is applied consistently. The general consensus among those participants at the debates who supported the principle of AACs, however, was that the boundaries should be determined at district level and substantiated in DPDs. This would be in line with the existing arrangements in the North West Plan concerning regional and urban areas, but would not necessarily ensure consistency across the sub-regions. However, we are not convinced that there is any mechanism in place for drawing up such detailed boundaries at sub-regional level.
- 11.13 Due to the high level of uncertainty surrounding the implementation of the AACs we consider that further guidance is required in order to ensure that their boundaries are drawn as consistently as possible. We also share the concerns of the Central Lancashire Authorities that the approach in the Partial Review would mean that local residents and other local parties would have no voice in the process. Due to the lack of any mechanism at this level, the lack of any accountability at this level and the fact that it would not achieve consistency across the region, we do not consider that it would be appropriate for something as detailed and potentially controversial as the AAC boundaries to be determined at sub-regional level.

Recommended approach

- 11.14 The approach we recommend involves a sub-regional/ district hybrid. We envisage that the explanation of the settlement centre types falling within each AAC currently set out in Appendix 1 of the Partial Review (page 24) would be used to assist the sub-regions in deciding on a method by which the category boundaries could then be defined within their constituent areas. The particular criteria or methodology could be determined by sub-regional groupings of local authorities based upon the established transport working arrangements [para 1.8]. This would enable consistency at sub-regional level. In the event that there was no agreement at this level, individual local authorities could still use the AACs having determined their own boundaries. We accept that not every authority area will have centres in each AAC; this is allowed for in the existing supporting text at paragraph 29.
- 11.15 Having determined the basis for the AACs at sub-regional level, in our opinion it should then be up to local authorities to define the precise boundaries within their own areas. While we anticipate that in the majority of cases the boundaries would replicate the city, town, district or local centre boundaries that have already been identified in adopted plans, any new boundaries could be drawn up using the DPD process. This would ensure full public involvement and complete transparency.

11.16 This approach only involves minor alterations to draft Policy RT2 to clarify that local authorities should define the precise boundaries of the AACs, and we recommend accordingly. In presentation terms, we do not see why the guidance on definitions of the AACs need be set out in an appendix. For ease of use, and in particular to assist those using the on-line version of the North West Plan, we consider that the existing explanation (currently in paragraphs I - IV of Appendix 1, minus the reference to sub-regions deciding on the boundaries between different areas and the references to sub-regional AQs in paragraph I) would be better positioned alongside other comments on the AACs in the supporting text close to Table 8.1, i.e. at paragraph 29. We also recommend that this part of the text should be strengthened to say that sub-regions should agree the method by which individual local authorities would then define the AAC boundaries, e.g. whether these would be based on the boundaries of existing centres or use new boundaries that take greater account of accessibility by public transport.

Recommendation 11.1

In Policy RT2, amend the last part of sentence 1 of the revised final bullet point to read: “with local authorities defining the precise boundaries of the proposed Area Accessibility Categories” [para 11.15].

Recommendation 11.2

Expand the supporting text at paragraph 29 to include an explanation of the settlement centre types within each Area Accessibility Category, together with a statement that sub-regions should agree the method by which AAC boundaries should be defined by their constituent local authorities [para 11.16].

ACCESSIBILITY QUESTIONNAIRE

Introduction and consultation response

11.17 Stage 2 of the approach set out in paragraph 29 of the supporting text to draft Policy RT2 requires each of the 5 sub-regions to produce an AQ. As set out above [para 11.2] it is intended that this be "based upon" the AQ provided in Appendix 1 of the Partial Review. The Mouchel report¹⁷³ says that this is to assess current accessibility at the local level in the area immediately surrounding a proposed development site.

11.18 At the consultation stage on the interim draft Policy¹⁷⁴, there was no question specifically relating to the AQ. However, the overall response to the interim draft Policy was mixed, with 43% of those who responded being in support of the draft Policy and 35% not supporting it. Individual responses at this stage, however, expressed some disquiet concerning the AQ. In particular St Helens Council raised “grave concerns” over it and AGMA questioned how an overall value could be of real significance.

11.19 Participants’ statements repeated this disquiet with concerns raised over its complexity; the lack of thresholds; how it could dovetail with existing local assessments such as that in Merseyside; and potential conflict with other planning considerations such as

¹⁷³ Mouchel report, para 6.4, Dec 2008 (RP2)

¹⁷⁴ Consultation on Interim Draft Policies: Car Parking, CAG Consultants, March 2009 (PRE8)

security. There was further concern that it could lead to perverse incentives to develop outside the main centres. During the Examination participants raised additional, detailed concerns such as the need for the questions to be more inclusive (Disabled Persons Transport Advisory Committee (DPTAC)) and the lack of any reference to ferries (Wirral BC).

Considerations

- 11.20 We have taken account of the relationship between the AACs and the AQ and the fact that the Mouchel report sees accessibility as the foundation upon which proposals for regional parking standards have been developed. We acknowledge the theoretical benefits of the proposed 2 staged process in that it would enable accessibility, at a highly localised level, to be taken into account in determining the maximum number of parking spaces that any particular development should be able to provide.
- 11.21 However, we consider that while local authorities may wish to adopt policies linking maximum parking standards to local accessibility, either at sub-regional level or within the LTA area, we do not consider it appropriate for this level of detail to be codified at the regional level. We consider that there are a number of significant factors that weigh against the principle of this 2 staged approach and we have concluded that these factors significantly outweigh the benefits.
- 11.22 With regard to the principle of the AQ, our concerns stem from the level of complexity of the 2 staged approach which we consider would detract from the simplicity and certainty that are achieved in the matrix for regional parking standards set out in Table 8.1 of the Partial Review. The diversity of the region also militates against requiring a 2 staged approach in addition to making it very difficult to devise an AQ that would satisfy all parts of the region. 4NW's 'concession' in debate that the proposed sub-regional AQs could be *based on*, rather than *adhere to*, the example [para 11.2] also means that it would be impractical to make it available on the Regional Assembly's website as suggested by Mouchel¹⁷⁵ linked to an electronic calculator as was the case with the website for the Joint Lancashire Structure Plan. This electronic calculator was demonstrated to us at the Data Meeting, where we appreciated that it is easy to use, with its results based upon the size and location of the proposed development. As that calculator makes use of particular named centres and factual indicators of local accessibility, it can be readily used by any potential developer.
- 11.23 We are also concerned about the potential for poor design arising from perverse incentives arising from the AQ. This could involve developers designing a scheme in order to minimise its points score and thus not incur such a high percentage reduction in parking provision. This was raised by us at the Data Meeting and while 4NW considered that it would be unlikely to occur as it could be negotiated out at the planning application stage, we are not convinced that it could be overcome that easily. While we do not consider that it would often occur, we can envisage circumstances in which the design or site layout could be used to influence parking provision. This would be contrary to the objectives of this accessibility-based approach.
- 11.24 We have also taken account of the Merseyside Transport Partnership's SPD e.g. as adopted by Liverpool City Council¹⁷⁶, which is similar in its questionnaire approach but seeks to understand the accessibility failings of a site by various different transport modes. The results are then used to secure improvements to the transport infrastructure

¹⁷⁵ Mouchel report, para 6.5, Dec 2008 (RP2)

¹⁷⁶ Ensuring a Choice of Travel Supplementary Planning Document, Merseyside Local Authorities and Merseytravel, adopted by Liverpool City Council, 2009 (RP5)

where necessary. This is a different objective and we do not consider that it would be reasonable to use 2 different questionnaires in tandem. Given the vastly different objectives of the 2 approaches – influencing parking provision and improving accessibility – we do not consider that the conflicts that would arise can be readily resolved.

- 11.25 For these three reasons (complexity, potential for poor design, and difficulty in reconciling with a different questionnaire purpose being used in Merseyside), we recommend deletion of the Accessibility Questionnaire from the Partial Review. This would mean deleting all references to a 2 staged approach as well as references to the AQ in the supporting text paragraph 29, deleting the proposed AQ on pages 25-27 of Appendix 1, and deleting the proposed quantified method of reducing parking provision based on the results of the AQ in paragraph V and the following table in Appendix 1. However for completeness, we also set out below our strong reservations about the details of the proposed questionnaire.

Detailed comments on AQ approach

- 11.26 If our recommendation to remove the AQ from the draft Policy is not accepted, we would wish to make the following detailed observations and criticisms of the AQ as presented in Appendix 1 to the Partial Review. First, and critically to the AQ as presented, we do not consider that a mix of qualitative and quantitative factors should be used. The quantitative factors have the benefit of at least being directly comparable and it would be possible to make sub-regional variations to take account of local conditions. The successful Joint Lancashire calculator is wholly quantitative.
- 11.27 The qualitative factors, however, rely on subjective opinions and thus cannot be directly comparable unless carried out using the same criteria. For example, a cyclist may have a different opinion as to what constitutes an “adequate” standard of road surface for cyclists compared to a non-cyclist. We also found it hard to draw distinctions between such qualitative factors as bus stops being “well lit” and having “adequate lighting”; what is considered adequate in a city centre may be considered well lit in a more remote location. At the Data Meeting we asked whether the AQ had been piloted; it appears that it has not and this could be one of the reasons for its shortcomings.
- 11.28 Some of the objective factors in the AQ drew criticism at the Examination sessions, such as DPTAC’s concerns about inclusiveness and their contention that 2 metres was an insufficient width for a footway to be considered “good”. If an AQ is to be retained, we recommend that it be re-drafted and fully piloted before being put forward as an example on which to base sub-regional AQs.
- 11.29 We are also concerned about the lack of any size threshold whereby developers for schemes under a certain, specified, size would not need to complete the questionnaire. As currently set out in the Partial Review, the AQ would need to be completed for every non-residential development. Unlike the Joint Lancashire electronic calculator, it would not be a simple questionnaire to complete; its requirements include detailed on-site measurements and qualitative judgements. We consider that this would place an unjustifiable additional burden on small businesses without having a significant impact on levels of car parking provision. For smaller developments the further reduction in maximum car parking that would arise from its accessibility rating would in some cases be likely to be measured in fractions of a parking space. We are not convinced that the benefits of completing the AQ would justify the significant inputs. We recommend that if the AQ is retained by the Policy it should have a threshold for developments of 500 sqm gross floor area, below which the AQ would not be required. This would then be

the same as that used in the Joint Lancashire Parking Standards¹⁷⁷ and also accord with that suggested in Appendix RT(d) of the North West Plan¹⁷⁸. The introduction of such a size threshold would save applicants for smaller developments from needing to complete an AQ, and would have only a very limited impact on the number of parking spaces permitted.

- 11.30 A further criticism concerns the loss of certainty that it would create. The detailed parking standards set out in Table 8.1 of the Partial Review provide a high degree of certainty for developers. The AQ introduces a layer of subjectivity. This relates not just to some of the answers to the AQ, but also to the accessibility ratings set out in paragraph V of Appendix 1. The percentage reduction in parking provision is in bands; an accessibility rating of “high” incurs a reduction of 10-25% while that for “very high” is at least 25%. We consider that such a precise scoring system, coming on top of very detailed Table 8.1 parking standards, should result in a precise reduction to maintain certainty. There is a minor presentational error in the table in paragraph V of the supporting text to the AQ. 4NW accepted that the maximum points for a “very high” rating should be 44 and not 47.

Conclusions

- 11.31 Overall, we do not consider that the AQ is necessary. We prefer the principle of using judgements based on local knowledge to justify any localised refinement to the matrix standards, but we believe that they should come into play on a case-by-case basis as part of the usual negotiation process. Such judgements would not need the complicated and time consuming AQ process. We further conclude that it would be preferable if, instead of having an AQ, the Partial Review provided guidance on the factors that would need to be taken into account in negotiations between development management officers and developers in determining whether there should be any reduction in the standards below those set out in the matrix. These would replace the references to the 2 staged process and the AQ in paragraph 29 of the supporting text.
- 11.32 This guidance could be quite straightforward and similar in content to the principles for residential parking as set out in paragraph VIII of Appendix 1 to the Partial Review. For larger schemes much of the information that would inform the negotiations would be submitted with the planning application as part of the design and access statement, the transport assessment or a travel plan. This approach would introduce local accessibility considerations but in the context of other, non-parking, considerations and enable an across-the-board common sense approach to be taken to the whole development. The importance of negotiating accessibility improvements where a development is proposed in an area of poor accessibility by a range of modes could also be included in this expanded paragraph 29 of the supporting text based on the guidance currently featured at the end of paragraph VI in Appendix 1.
- 11.33 We also note that Mouchel identified that the AQ could be a useful tool in comparing the sustainability of different site options at the site allocations stage in the forward planning process. We agree, and see no reason why local authorities should not use an in-house AQ or a form of checklist for this purpose¹⁷⁹.

¹⁷⁷ Joint Lancashire Structure Plan parking standards appendix, p10, Lancashire CC, March 2005

¹⁷⁸ North West of England Plan, Appendix RT(d), p178, GONW and CLG, Sept 2008 (RSS1)

¹⁷⁹ DfT's Accession model may also be relevant

Recommendation 11.3

Delete the Accessibility Questionnaire from the draft policy approach [para 11.25], with consequential amendments to paragraph 29 of the supporting text to indicate the factors that should influence negotiations between development management officers and developers on any reduction in parking standards [paras 11.31-11.32].

Recommendation 11.4

If Recommendation 11.3 is not accepted, the Accessibility Questionnaire should be amended:

- to delete the subjective elements such that it results in a wholly quantitative and objective questionnaire [paras 11.26–11.28];
- to apply to only developments exceeding 500 sqm gross floor area [para 11.29]; and
- in respect of the accompanying chart at paragraph V of Appendix 1 such that the maximum points total for a very high rating reads 44 and not 47 [para 11.30].

Not issued

12 RESIDENTIAL PARKING STANDARDS

Matter 1.1

This chapter examines guidance on residential parking standards which has been added by the Partial Review to Policy RT2. It first considers whether their inclusion adds value, and secondly whether the standards provide sufficient local flexibility. Recommendations are included to improve the clarity of this guidance.

BASIS FOR REGIONAL RESIDENTIAL STANDARDS

Value added

- 12.1 This Partial Review adds control of residential parking to Policy RT2 for the first time. 4NW emphasised that this should be seen within the context of the North West Plan's wider approach to demand management, which seeks to reduce car use not car ownership. There was no opposition to the principle of including residential parking standards in the debates.
- 12.2 GONW asked us to check via debate that the proposed standards would add value to local authorities. Participants identified that residential parking policies would fulfil the following roles:
- helping to reduce car dependency in new developments;
 - providing an incentive for developers to be imaginative in residential layouts;
 - having a positive influence on the quality of place created¹⁸⁰; and
 - helping to maximise the use of land to meet housing and brownfield targets.
- 12.3 We agree with these points which specifically relate to setting residential standards, and are in addition to the more general benefits of encouraging consistency between local parking policies identified in Chapter 9. On this basis, we are satisfied that residential standards would add value and we support their inclusion.

Scope for local flexibility

- 12.4 The next issue is therefore whether they have been set at an appropriate level, and whether they would provide sufficient local flexibility. We acknowledge that there is a balance between reducing residential standards in order to promote sustainable travel, and not being so restrictive that it prejudices pedestrian and road safety, impedes community transport vehicles and causes overspill parking in surrounding areas. In our view 4NW has tried to be realistic about future car ownership levels¹⁸¹. We also note that the proposed standards have been set at levels which largely reflect practice throughout the region at 2007¹⁸².
- 12.5 Two concerns were raised on whether the proposed approach gave sufficient local flexibility. First was the concern by the HBF that the regeneration of inner-city areas falling within Area Accessibility Category A could be prejudiced. This was on the basis that the market for high-density city centre apartments was now saturated while the

¹⁸⁰ As encouraged by CABE in What it's like to live there: the views of residents on the design of new housing, CABE, 2005 (PD1)

¹⁸¹ Projected to increase from a regional average of 1.12 cars/household at 2001 to 1.8 by 2025, Mouchel report, p61, Dec 2008 (RP2)

¹⁸² Mouchel report, p61, Dec 2008 (RP2)

growing demand was for 2 bed houses. It could foresee circumstances where a higher provision would be necessary to entice higher earners into such areas. Its solution to providing this additional flexibility was to change the policy wording such that local standards should be developed “*in line with*” but not necessarily “*more restrictive than*” those in Table 8.1. We do not agree with this suggestion since it would fundamentally change the basis of the policy (which in this respect is exactly the same as currently in the North West Plan). However we think that our suggested addition to the supporting text [para 12.11] will help to alleviate its concerns.

- 12.6 Although the proposed standards for Area Accessibility Category C are intended to be “advisory”, Cumbria CC expressed concerns that this may give rural authorities insufficient flexibility. It sought an ability to set minimum residential standards, or at least to specify that standards for Area C should be set by the 5 sub-regions. We do not agree with any suggestion that minimum standards should be set, since this is contrary to Government policy¹⁸³. Nevertheless we interpret the meaning of “advisory” as suggesting that although maximum standards in LDFs should not be more generous than those given in Table 8.1, there could be local discretion in applying these to particular development proposals within such areas. We therefore consider that rural areas would have local flexibility in practice at the development control stage.

NUMERICAL STANDARDS IN TABLE 8.1

- 12.7 The only change that we recommend to the proposed standards is in relation to one bed dwellings in Area Accessibility Category A, which is currently expressed as 0.5 to 1. Although we understand why figures may have been expressed in this way to give a hint that reduced parking provision may be appropriate in the most accessible locations, we agree with AGMA and others that as a matter of logic it is impossible to have a maximum based on a range. We therefore recommend that this standard should be expressed as a maximum of one space.
- 12.8 Garage provision is not intended to count as part of the proposed standards, unless their long-term use for the storage of vehicles is protected by appropriate planning conditions¹⁸⁴. Trafford Council saw a risk in this approach that too many parking spaces would be provided in larger family houses in suburban areas. However we are content with the proposed approach, since this provides a degree of local flexibility as Rossendale BC pointed out, and because it would be unwise to give a perverse incentive for developers not to build garages, as pointed out by HBF. With adequate encouragement to negotiate reduced standards where appropriate [see para 12.12] we consider that authorities in suburban areas should have sufficient leverage/muscle in determining individual applications.

Recommendation 12.1

Amend the standard for one bedroom dwellings in Area Accessibility Category A to a maximum of one space not a range of 0.5-1 space [para 12.7].

Clarification points

- 12.9 We have already suggested an addition to the supporting text at paragraph 28 to make clear that operational parking is in addition to the standards in Table 8.1 [R10.5]. This

¹⁸³ PPG13 Transport, para 52, ODPM, March 2001

¹⁸⁴ as stated in the Partial Review, Appendix 1, para VIII

will overcome confusion that arose during the residential debate. In the context of residential use, operational parking includes space for deliveries, servicing, furniture removers, decorators and cleaners. This provision is particularly important as the demand for home deliveries from internet shopping increases.

- 12.10 We also ascertained from 4NW that an allowance for visitor parking is already included in the standards, as it is for the non-residential parking standards in Table 8.1. We therefore recommend that this point is also stated in the supporting text, paragraph 28, for the avoidance of doubt.
- 12.11 There is currently no supporting text on the residential element of Table 8.1. We agree with GONW that it would be useful to introduce some text to spell out that in developing local residential parking standards in LDDs, local planning authorities will need to reflect local circumstances. Examples of such factors would be the expected levels of car ownership, good design, choice of modes, safety considerations, regeneration needs, and the availability of and restrictions upon alternative sources of car parking. These factors expand upon those listed in PPS3¹⁸⁵. The final point is important in that it not only hints at the possibility of shared parking but also the risks of overspill parking into surrounding areas. This addition to the supporting text would, in our opinion, increase the degree of local flexibility open to local authorities, and we recommend accordingly.
- 12.12 To facilitate understanding, and in line with our preference for amalgamating material currently in Appendix 1 into the main text [para 10.28], we recommend new supporting text, based on Appendix 1 paragraph VIII to encourage the negotiation of reduced provision from the maximum residential parking standards in all 3 Area Accessibility Categories in appropriate circumstances. Such encouragement is only currently stated for Areas A and C. We see no reason to incorporate the diagram on page 28 and the text of paragraph VII of Appendix 1 since they do not add further to the information already in Table 8.1.
- 12.13 We consider that the Partial Review is right in not seeking to introduce the use of an Accessibility Questionnaire into what is essentially a negotiation process. This is not just for the reason given by 4NW at the Data Meeting that the scoring would generally result in fractions of spaces, but also because of the concerns we have already expressed including about the complexity and burden of applying the questionnaire [paras 11.2 and 11.29] and its inclusion of subjective elements [paras 11.26-11.28]. The existing text on the appropriateness of car free developments or much reduced parking in Area Accessibility Category A, in parallel with the use of residential Travel Plans and measures such as car clubs¹⁸⁶, should lend weight to development management officers. We were pleased to hear that the Greater Manchester Chamber of Commerce was active in promoting such initiatives.
- 12.14 The definitional points that are currently included in the Appendix, e.g. on the interpretation of allocated and unallocated parking and garage space, and their relevance to negotiating reduced parking on particular applications, should in our view be added to the Comments column of Table 8.1. We recommend accordingly to improve the clarity of Table 8.1.

¹⁸⁵ PPS3 Housing, para 51, CLG, Nov 2006

¹⁸⁶ currently in Appendix 1, para VIII

Recommendation 12.2

State in the supporting text paragraph 28 that visitor parking is included in all the standards set out in Table 8.1 [para 12.10].

Recommendation 12.3

Add supporting text in a new paragraph 29A to emphasise the local circumstances that should be taken into account in setting local residential standards in LDDs [para 12.11].

Recommendation 12.4

Add supporting text in a new paragraph 29A setting the circumstances in which residential parking provision below the maximum levels might be negotiated within all 3 Area Accessibility Categories [para 12.12].

Recommendation 12.5

Add the definitions of allocated and unallocated parking and garage space, and their relevance to negotiating reduced parking, to the Comments column of Table 8.1 [para 12.14].

13 OTHER PARKING STANDARDS

Matter 1.6

This chapter examines the appropriateness of the parking standards within Table 8.1 of the Partial Review for parking for disabled people, bicycles, motorcycles and coaches. It also includes recommendations for improving the clarity of guidance within paragraphs 30-31 of the supporting text.

INCLUSION OF STANDARDS IN TABLE 8.1

- 13.1 Table 8.1 of the Partial Review sets out the minimum parking standards by use class for parking for disabled people, bicycles, motorcycles and coaches in addition to the maximum car parking standards.
- 13.2 The existing parking standards, as set out in Table 8.1 of the North West Plan¹⁸⁷ do not include any standards for bicycles, motorcycles or parking for disabled people, although guidance as to appropriate levels of parking is provided in Appendix RT(d). For bicycles and two wheeled motorised vehicles this guidance states “*Secure parking facilities should be provided to a minimum standard of 10% of the baseline standards for each category*”. Regarding parking for people with disabilities, the North West Plan notes that the Department for Transport (DfT) guidance¹⁸⁸ should be an input to an authority’s plans and strategies for parking standards, and sets out standards for new employment premises, shopping areas, leisure or recreational facilities and places open to the public. The North West Plan also provides a table setting out recommendations for additional parking spaces at railway stations.
- 13.3 We were encouraged by the general support for the more detailed approach as set out in Table 8.1 of the Partial Review, and we are confident that the standards will provide a useful tool for both local authorities and developers in their negotiations on developments.

PARKING FOR DISABLED PEOPLE

- 13.4 Regarding the specific standards for parking for disabled people as set out in Table 8.1 of the Partial Review there was some confusion from participants¹⁸⁹ over the change in the standards at 200 bays. Wigan Council¹⁹⁰ also raised concerns that it may be unreasonable to require a minimum of 3 bays (for example) on a small car park of perhaps only 4 bays. It suggested a stepped approach to the standards up to the 200 bay limit that is current practice in Wigan. 4NW point out that the standards have been developed and benchmarked against DfT’s Traffic Advisory Leaflet 5/95¹⁹¹, which includes the 200 bay split for the standards. We did not hear any evidence to suggest that this national guidance was inappropriate for the region.
- 13.5 We agree with Wigan Council’s concerns that there could be an anomaly in the table, particularly with regards to smaller developments. Although we do not suggest any changes to the individual use class standards themselves, we would recommend acknowledgement of this issue in the supporting text at paragraph 31, and that local

¹⁸⁷ North West of England Plan, RSS to 2021, Table 8.1, GONW and CLG, Sept 2008 (RSS1)

¹⁸⁸ Traffic Advisory Leaflet 05/95, Parking for Disabled People, DfT, April 1995 (T1)

¹⁸⁹ including the Chartered Institution of Highways and Transportation North West Branch (Matter 1 Statement)

¹⁹⁰ Representation 86 and Panel Note 2 to assist debate on question 1.6, 2 March 2010 (EiP15)

¹⁹¹ Traffic Advisory Leaflet 05/95 (T1)

- authorities should take a practical approach to the minimum standards when assessing the requirements for parking for disabled people in respect of small scale developments.
- 13.6 Trafford Council queried at the Examination whether the health centres and sheltered accommodation standards should be altered to reflect the additional requirements for parking for disabled people for these uses. It notes that the Joint Lancashire Structure Plan Standards¹⁹² recognises that “*additional mobility spaces than indicated by overall provision may be required at locations such as Health Centres....*” We note that the Considerations box for C2 uses in Table 8.1 notes that parking requirements must reflect the likely proportion of disabled residents and visitors, and recommend that similar advice is repeated in the “Parking Management and Design” box for D1 clinics and health centres. These guidance notes, together with guidance in paragraph 31 of the supporting text which says that “*the developer should consider within their proposals whether developments are likely to have higher levels of use by disabled drivers, possibly due to development type and location*” would then provide sufficient flexibility for local authorities to review Table 8.1 standards for these uses if local circumstances warrant a different standard to be set in LDDs.
- 13.7 Trafford Council and Rossendale BC among others noted that the provision of parking for mobility scooters was increasingly becoming an issue that was being raised at the local level. We agree this issue should be addressed, but note 4NW comment that there is insufficient evidence to include a specific figure for this form of parking provision within the standards table. The specific provision required is difficult to quantify at the regional level and it should be negotiated on a case-by-case basis at the local level, in consultation with appropriate user groups. We recommend that paragraph 31 of the supporting text notes the potential need for parking provision for mobility scooters, and this should be assessed by local authorities in negotiation with developers where appropriate.
- 13.8 DPTAC provided us with useful background evidence on the issues faced by disabled people, and also the facilities and provisions required to ensure full accessibility for them. Many of the issues raised require action relating to the management of parking provision, and these should be addressed by local authorities through preparation of strategies and plans such as Local Transport Plans (LTPs).
- 13.9 On a point of clarity raised by Greater Manchester Chamber of Commerce¹⁹³ regarding paragraph 31 of the supporting text 4NW clarified that it would be local authorities that were encouraged to involve the local disabled and elderly groups in assessing specific needs and monitoring implementation. We also note that the North West Plan covers issues of accessibility in Policies such as DP5 (Manage Travel Demand;...) and L1 (Health, Sport, Recreation...).
- 13.10 We also note that the requirements for parking for disabled people are additional to the car parking maximum standards¹⁹⁴. This accords with national guidance within PPG13¹⁹⁵, although this point is somewhat confused by the final sentence of paragraph 31 of the supporting text which we recommend is clarified.

Recommendation 13.1

Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A on parking for disabled people for D1 Clinics and Health Centres [para 13.6].

¹⁹² Joint Lancashire Structure Plan parking standards appendix, Lancashire CC, March 2005 (RP3)

¹⁹³ Greater Manchester Chamber of Commerce Matter 1 statement

¹⁹⁴ As confirmed by 4NW in Matter 1 debate

¹⁹⁵ PPG13 Transport, Annex D, ODPM, March 2001

Recommendation 13.2

In the supporting text paragraph 31 on parking for disabled people:

- acknowledge that local authorities should take a practical approach to the minimum standards when assessing the disabled parking requirements of small scale developments [para 13.5];
- mention the potential need for local planning authorities to consider parking provision for mobility scooters [para 13.7]; and
- state categorically that the disabled parking requirements are additional to the car parking standards [para 13.10].

PARKING FOR BICYCLES AND MOTORCYCLES

Bicycles

13.11 At the Examination sessions we heard from several participants of the need to promote cycling as an alternative to use of the private car. Bicycle parking standards can play an important role in this by ensuring that the facilities are available for cycle users to encourage trips to take place. There was little objection to the introduction of the bicycle parking standards into Table 8.1 and we agree that by putting them in the Table it can be seen as giving this mode of travel equal footing with car travel.

13.12 Table 8.1 sets minimum parking standards for bicycles and motorcycles. Both GONW and the Highways Agency note that PPG13¹⁹⁶ states that “*There should be no minimum standards for development, other than parking for disabled people.*” GONW also point to PPS4¹⁹⁷ which reiterates this advice. GONW stated in debate that it would not object to the Partial Review including minimum standards on bicycle parking, since the intention of PPG13 is to encourage sustainable travel and current Government policy is very supportive of encouraging cycling. We recommend no change to the standards in this regard, noting that the North West Plan already refers to minimum standards for bicycle parking in Policy RT2.

13.13 Cycling England¹⁹⁸ considered that developers should be encouraged to assess current and future demand, rather than apply the minimum standards. We agree with the need to encourage developers to introduce more parking for bicycles where necessary, but are satisfied that the minimum standards provide the flexibility for this to occur if needed, and the North West Plan as a whole provides support for this without the need for additional supporting text.

13.14 Some concerns were raised in debate that the North West Plan’s aim of promoting cycling did not come through in Table 8.1 of the Partial Review and its supporting text. However there are several policies within the North West Plan that promote cycling as an alternative to the car, and the document should be read as a whole. Nevertheless we consider that this support for cycling (and motorcycling) would be even clearer if they had their own paragraph in the supporting text¹⁹⁹ [see para 13.25].

13.15 Halton BC and others noted that the quality of cycling facilities was often as important as the quantity provided. We note that the need to incorporate high quality cycle

¹⁹⁶ PPG13 Transport, para 52, ODPM, March 2001

¹⁹⁷ PPS4 Planning for Sustainable Economic Growth, para EC8.1, CLG, Dec 2009

¹⁹⁸ Cycling England Matter 1 statement

¹⁹⁹ Paragraph 28 currently intersperses comments about coach parking with those on cycling and motorcycling

facilities, including secure cycle parking is already included in the North West Plan²⁰⁰. Paragraph 30 of the supporting text in the Partial Review includes guidance on locating cycle parking as close as possible to the main entrance of the building, covered by natural surveillance, CCTV and adequate lighting, although this is only mentioned in relation to office and retail developments. We agree that the quality of provision is a key issue in encouraging more cycle trips, but consider this issue to be adequately covered in the Partial Review.

- 13.16 Cycling England among others noted the importance of providing bicycle parking within residential developments. We agree that in order to encourage more people to take bicycle trips as an alternative to the car then the provision of bicycle parking at the trip source will be important. Halton BC²⁰¹ considered that the provision for houses should to be tied into the size of garage provision. We do not consider that this is necessary, and it would be difficult to provide a threshold to what could be constituted an acceptable size of garage for bicycle storage. It is appropriate that Table 8.1 of the Partial Review already notes that cycle provision need not be provided if garages are available, as this space could be used for storage of bicycles.
- 13.17 Cycling England²⁰² point to the list of land uses set out in paragraph X of the supporting text that are excluded from Table 8.1 of the Partial Review. They note that these establishments are also places of work and places people travel to for leisure or business, and should therefore have minimum parking standards for bicycles. Our recommended footnotes to Table 8.1 are intended to stimulate thinking about parking for all modes, not just car parking [Appendix A].

Motorcycles

- 13.18 As noted above [para 13.12], we are satisfied that the use of minimum parking standards for bicycles accords with the direction of travel of Government guidance in the promotion of alternative forms of transport than the car. Our considerations on this issue apply equally to the use of minimum standards for motorcycles (as already referred to in the North West Plan Policy RT2, albeit referred to as “2 wheeled motorised vehicles”).
- 13.19 There were few challenges to the standards set for motorcycles. GONW referred to the Traffic Advisory Leaflet 2/02²⁰³ which states “*local conditions will vary, so it is recommended that local authorities and other providers carefully assess demand and consult with users prior to the provision of new parking.*”, and although it supported the use of minimum parking standards for bicycles, it found it harder to justify the inclusion of minimum standards for motorcycles. Although we heard conflicting views as to the growth/decline in motorcycle usage we agree with 4NW that motorcycle use should be encouraged as an alternative to private car travel, and Table 8.1 should set out minimum standards for motorcycle parking.
- 13.20 The standards have been calculated using the 2001 Census data and comparing the number of people using a motorcycle with the number of people cycling to work²⁰⁴. Although this may not provide a completely accurate picture of need, we were presented with no alternative data to consider. We are satisfied that the standards represent a useful starting point for negotiation with developers or for local authorities

²⁰⁰ E.g. Policy RT9 and paragraph 8.12

²⁰¹ Halton BC Matter 1 statement

²⁰² Cycling England Matter 1 statement

²⁰³ Traffic Advisory Leaflet 2/02 Motorcycle Parking, DfT, March 2002 (PD15)

²⁰⁴ 4NW Matter 1 statement

to develop further taking into consideration more local information or circumstances, and see no reason for any changes.

13.21 Lake District National Park Authority²⁰⁵ objected to the wording in paragraph 30 of the supporting text that encourages motorcycles as an alternative to private car travel. The Authority consider that encouraging motorcycles potentially conflicts with the need to maintain and enhance the tranquillity of open countryside and rural areas²⁰⁶, and there is an acknowledged issue with noise and safety signage associated with motorcycle usage. Although we recognise these concerns, the issues raised should be considered through local level planning strategies and managements plans. At the regional level we agree with the statement to encourage alternative forms of transport and suggest no alteration to the supporting text in this respect.

COACH PARKING

13.22 Although, as 4NW point out, within the standards table there are relatively few land uses that automatically require parking for coaches, there was general support for the inclusion of the guidance for this mode of transport. Greater Manchester Chamber of Commerce questioned the need for standards for coaches, suggesting that the standards be removed with more emphasis on finding local solutions. Although the Partial Review only sets a standard for a few uses in terms of requiring a minimum of 1 pick-up/ drop-off space, other uses are identified in which negotiation should take place on a case-by-case basis. We are satisfied that the Partial Review is correct in identifying the need for coach parking to be considered for these land uses, and that negotiating on a case-by-case basis at the local level is appropriate.

13.23 At the Examination the Confederation of Passenger Transport (CPT) noted that retail outlets could sometimes be tourist attractions and therefore also require coach parking. We agree with 4NW's suggestion that additional text would be useful to cover this issue, and recommend that "negotiated on a case-by-case basis" be included in the parking and drop-off standard box for A1 non-food retail and retail warehouses.

13.24 We heard from CPT about the need for dialogue between local authorities and the coach industry to ensure adequate provision of both safe and secure parking spaces and rest facilities. They note that the Mouchel report²⁰⁷ recommends coach management strategies should be developed for all local authority areas. We consider that this is an issue that needs to be assessed at the local rather than regional level, particularly in areas attracting high levels of coach trips. This is a wider issue than just the provision of parking spaces, and we consider that the North West Plan already provides sufficient guidance in Policy RT4 (Management of the Highway Network) and paragraph 8.18.

Recommendation 13.3

Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A on coach parking and drop-off for A1 non-food retail and retail warehouse uses [para 13.23].

²⁰⁵ Representation 9

²⁰⁶ North West Plan, Policy DP7 (RSS1)

²⁰⁷ Mouchel report, para 10.1, Dec 2008 (RP2)

TABLE 8.1 AND SUPPORTING TEXT – OTHER DRAFTING ISSUES

- 13.25 There was some concern that by including the additional standards within the Table the issues associated with them are somewhat less prominent than they are in the North West Plan, where cycling and parking for people with disabilities are afforded their own sub-headings. We agree to a point with this view. Although we consider that the standards for parking for disabled people, bicycles, motorcycles and coaches should remain in Table 8.1 to provide one focal point for guidance, we have already advised that separate paragraphs in the supporting text dealing with cycling and motorcycles; coach parking; and parking for disabled people would assist clarity [para 13.14], and recommend accordingly.
- 13.26 In the light of our conclusion that minimum standards for cycle and motorcycles are appropriate [paras 13.12 and 13.18-13.19], we agree with the Chartered Institute of Highways and Transportation²⁰⁸ that the columns in Table 8.1 of the Partial Review for bicycles, motorcycles and parking for disabled people should include (*minimum*) in their heading to indicate that the standards are indeed minima, as stated in the coaches column.
- 13.27 4NW confirmed²⁰⁹ that there was an error in paragraph 30 of the supporting text, and that the reference to Heavy Goods Vehicles (HGVs) should be removed. We agree with the removal of this reference and recommend accordingly.
- 13.28 Rossendale BC suggested at the Examination sessions that the issue of parent and child parking should be brought out in the guidance and that some provision be made for this type of parking. The need for this issue to be considered is recognised in Table 8.1 under the considerations box for A1 uses. We agree that this issue is a management and design consideration as much as it is about the provision of parking spaces. It is therefore appropriate that this issue should be dealt with at the local level, taking into account local circumstances when assessing the need for further parking provision, and in this respect Table 8.1 is appropriate in the guidance it provides.
- 13.29 One further point was raised in debate by Rossendale BC with regards to the particular need for taxi parking at food retail stores. It was noted that people would often travel to a supermarket by public transport, and then get a taxi home after food shopping. Although there is no evidence to support a particular standard for this use, we agree that the Comments box for this use should highlight the need to consider this issue, and recommend accordingly.
- 13.30 With regards to the proposed wording of the final bullet point of Policy RT2 we recommend a minor alteration in the last sentence so it reads “Parking for disabled people’s *vehicles*, motorcycles...”.
- 13.31 It follows from our previous considerations that Appendix 1 of the Partial Review would no longer be necessary. All its remaining content could be reasonably included in Table 8.1 and the supporting text to Policy RT2 [paras 10.28, 11.16, 11.25, 11.31-11.32, 12.11-12.12, and 12.14].

²⁰⁸ 4NW Matter 1 statement

²⁰⁹ Amendments to Parking Standards Table and Supporting Text, 4NW, Jan 2010 (DM37)

Recommendation 13.4

In the supporting text to draft Policy RT2:

- separate out guidance on cycling and motorcycles, from coach parking [para 13.25]; and
- delete all references to HGVs from paragraph 30 [para 13.27].

Recommendation 13.5

In Table 8.1

- include “(minimum)” in the heading boxes for parking for disabled people, bicycles and coaches [para 13.26].
- highlight the potential need to consider taxi parking in the Comments box for A1 food retail use [para 13.29].

Recommendation 13.6

In Policy RT2, amend sentence 2 of the revised final bullet point to read “Parking for disabled people’s *vehicles*, motorcycles...”[para 13.30].

Recommendation 13.7

Delete Appendix 1 of the Partial Review having transferred relevant guidance into Table 8.1 and into the supporting text (see also R10.4, 11.2-11.3, 12.3-12.5) [para 13.31].

14 MONITORING AND REVIEW OF PARKING STANDARDS

Matter 1.7

This chapter examines the appropriateness of the monitoring framework and review process for parking standards, and whether further indicators for regional parking are required.

MONITORING

- 14.1 There is no mention of monitoring in the supporting text to revised Policy RT2, although monitoring mechanisms covering all topics are set out in the North West Plan, Chapter 14. However the percentage of new non-residential development with a minimum gross floorspace of 1,000 sqm by type of development complying with regional parking standards has been measured for at least the last four years²¹⁰.
- 14.2 This regional parking indicator was until February 2008 part of the national core set²¹¹. The fact that 4NW continued to assemble data for the financial year 2008/09 as published in their most recent Annual Monitoring Report implies that it is considered to be a useful measure of the implementation of the RSS spatial strategy.
- 14.3 In monitoring the revised Policy RT2, as we hope that 4NW and NWDA will do, the applicability of this indicator needs to be considered given the broader range of land uses now included in Table 8.1 and the introduction of 3 Area Accessibility Categories.
- 14.4 For non-residential developments we do not suggest any change to this existing indicator, for the following reasons:
- The information is collected for industrial and commercial, retail, and leisure categories, which captures the most mobile and high profile uses.
 - The minimum threshold of 1,000 sqm captures the strategic developments of most interest at the regional scale.
 - Continuity with previous monitoring results would be retained, which means that data sets are less subject to short term influences.
 - Compliance against parking standards for local service uses would be more appropriately included in LDF monitoring.
- 14.5 The Area Accessibility Categories will introduce an additional stage in the assessment of compliance against appropriate regional standards, but presumably this hurdle has already been incorporated into the monitoring of differential standards within urban and other parts of the region in the current North West Plan.
- 14.6 In deliberating on whether to recommend the introduction of a similar parking compliance indicator for strategic scale residential development, we have considered both the potential usefulness of the data collected and the resource costs to 4NW and local authorities²¹². On balance, and also bearing in mind the scope for local flexibility in negotiating particular applications as discussed in Chapter 12, we do not suggest adding a regional parking indicator for residential uses. This would leave any

²¹⁰ RSS Annual Monitoring Report for the North West, Indicator 6.2, 4NW, Feb 2009 (RSS3) and RSS Annual Monitoring Report for the North West, Indicator 3.4, 4NW, Feb 2010 (RSS4). Compliance results for each of the most recent 4 years are given in Chapter 9

²¹¹ RSS and LDF: Core Output Indicators – Update 2/2008, CLG, July 2008 (PD11). This states that Indicator 3a has been removed, although it notes that authorities should continue to report any policies on car parking where part of the development plan

²¹² The mechanics of defining and assembling data takes 9 months to complete, according to 4NW in debate

monitoring for all scales of residential development to take place at local level, which we consider to be the right place.

14.7 We have a greater interest in the ways in which the outcome of the use of parking standards might be investigated. There are various aspects that could usefully be explored, namely to ascertain whether:

- the existence of a regional framework has improved the consistency of standards within local level plans between adjoining authorities;
- developers have been able to negotiate more generous parking provision in practice despite restrictive standards, and if so in what circumstances; and
- the existence of restrictive standards has had unintended consequences e.g. in deterring business or retail investment in town centres and diverting it to out-of-town locations, or causing overspill parking problems in surrounding areas by under providing in a major new development.

14.8 Although it would be very difficult to operationalise monitoring of this sort at the regional scale, or indeed on a regular basis, we are attracted by the Highways Agency's suggestion of a selective audit of large development sites to understand consistency in the application of regional standards or not, and the impact of those standards in the finished development and on the local area. As the results would be of interest to policy-makers beyond this region, we consider that this might fit better as a research study commissioned nationally based on a wide range of case studies.

REVIEW PROCESS

14.9 The expectation for RSS policies was that they would be reviewed every 5 years and it is understood that this same guidance is carried forward in the Government's policy statement on new Regional Strategies, which was published a week before the EiP debates. Given that the legal framework for single Regional Strategies has only commenced at the beginning of April 2010, quite apart from any other uncertainties associated with the forthcoming general election, we would not expect 4NW to be able to commit to a precise date or process by which regional parking standards might be reviewed.

14.10 We do not consider that a specific reference to monitoring and review needs to be included in the supporting text to Policy RT2, as the issues on this topic are adequately covered by Chapter 14 of the North West Plan.

14.11 If the regional planning function is not retained in its current form, we hope that the co-ordination of parking standards, including their review as triggered by monitoring results, would continue at a sub-regional scale, possibly under working arrangements used for transport planning. The pivotal role of the Merseyside Transport Partnership and Merseytravel in supporting an SPD on travel choice including parking standards is a useful role model here.

APPENDIX A RECOMMENDED CHANGES TO POLICIES L6 AND L7 AND POLICY RT2

POLICY L6 SCALE & DISTRIBUTION OF GYPSY & TRAVELLER PITCH PROVISION

To contribute to housing provision in the North West as a whole, provision will be made for **at least 890 net additional residential pitches for Gypsies & Travellers over the period 2007 to 2016**. In doing so Local Authorities should: ensure there is no net loss in existing levels of provision; and distinguish between permanent residential and transit pitches to deliver the distribution of pitches contained in **Table 7.2**.

Local Authorities should work together to establish a network of transit pitches. Provision should be made for at least an additional 220 formal transit pitches by 2016, distributed as set out in Table 7.2.

Beyond 2016 provision will be made across the region for an annual 3% compound increase in the regional total of residential pitches, equating to at least **296 additional pitches between 2016 and 2021**. The proportion of this regional total to be accommodated in each district should be the same as its share of the regional requirement for 2007-16*. A co-ordinated review of sub-regional Gypsy and Traveller Accommodation Assessments (GTAAs) should be undertaken by 2013 to provide the evidence base for a subsequent review of this policy.

Local Planning Authorities should take account of the specific needs of different groups of Gypsies & Travellers. In doing so, they should work with housing and other professionals, site managers, local Gypsies & Travellers and settled communities, to achieve levels of provision required by 2016, as soon as possible across a range of sites and tenures through:

- the development management process, particularly when opportunities present themselves in respect of new major developments; and
- the identification of sufficient sites in Development Plan Documents.

Sites should be identified having regard to: Circular 01/2006 and PPS3, the spatial priorities in RDF1 and RDF2, Green Belts in RDF4, and relevant principles set out in the DP policies and policies EM5, L1 and L5.

The preparation of joint or co-ordinated Development Plan Documents between two or more districts, to identify suitable locations for pitches is encouraged, and where they are produced provision can be redistributed across the areas concerned.

* The 3% annual compound increase is applied to the regional pitch total at 2016 in Table 7.2 (1,860) for as many years into the future as is necessary to tie in with the end date of a given authority's DPD, i.e. by multiplying 1,860 by 1.03 for each year after 2016 that the DPD would run. The proportion of this regional increase from 2016 to be attributed to that authority is established by expressing its 2007-2016 residential pitch requirement as a percentage of the regional requirement of 890 (from Table 7.2, column 2). This percentage share is then applied to the post 2016 regional requirement already calculated.

Table 7.2 - Scale & Distribution of Gypsy & Traveller Pitch Provision				
District	<i>Current Authorised Provision in 2007</i>	Minimum Additional Permanent Residential Pitches Required 2007- 2016	<i>Proposed Provision of Permanent Residential Pitches at 2016</i>	Minimum Additional Formal Transit Pitches Required 2007- 2016
<u>Cumbria Sub Regional Partnership</u>				
Eden <i>(outside of Lake District National Park)</i>	44	13	57	10
Carlisle	30	35	65	10
Allerdale <i>(outside of Lake District National Park)</i>	0	14	14	5
Copeland <i>(outside of Lake District National Park)</i>	0	2	2	5
Barrow in Furness	17	6	23	5
South Lakeland <i>(outside of Lake District National Park)</i>	0	5	5	5
Lake District National Park	0	0	0	0
<u>Cheshire Sub Regional Partnership</u>				
Cheshire East	95	63	158	10
Cheshire West & Chester	55	48	103	10
Halton	36	43	79	5
Warrington	20	23	43	5
St Helens	50	28	78	5
<u>Lancashire Sub Region Partnership</u>				
Blackburn with Darwen	48	35	83	5
Hyndburn	86	10	96	5
Burnley	0	15	15	5
Pendle	0	15	15	5
Blackpool	51	0	51	5
Fylde	0	15	15	5
Wyre	0	15	15	5
Lancaster	158	40	198	5
Chorley	0	10	10	5
Preston	12	20	32	5
South Ribble	0	10	10	5
Ribble Valley	4	10	14	5
Rosendale	0	10	10	5

Table 7.2 - Scale & Distribution of Gypsy & Traveller Pitch Provision				
District	<i>Current Authorised Provision in 2007</i>	Minimum Additional Permanent Residential Pitches Required 2007- 2016	<i>Proposed Provision of Permanent Residential Pitches at 2016</i>	Minimum Additional Formal Transit Pitches Required 2007- 2016
West Lancashire	0	15	15	10
<u>Merseyside Sub Regional Partnership</u>				
Knowsley	0	13	13	5
Liverpool	14	17	31	5
Sefton	16	17	33	5
Wirral	0	13	13	5
<u>Greater Manchester Sub Regional Partnership</u>				
Bolton	26	35	61	5
Bury	17	40	57	5
Wigan	34	35	69	5
Salford	31	35	66	5
Manchester	16	55	71	5
Oldham	0	20	20	5
Rochdale	27	45	72	5
Tameside	0	15	15	5
Stockport	0	30	30	5
Trafford	83	20	103	5
NW Total	970	890	1,860	220

POLICY L7 – SCALE & DISTRIBUTION OF TRAVELLING SHOWPEOPLE PLOT PROVISION

To contribute to housing provision in the North West as a whole, provision will be made for **at least 285 net additional plots for Travelling Showpeople over the period 2007 to 2016**. In doing so Local Planning Authorities should ensure there is no net loss in existing levels of provision and deliver the distribution of plots contained in Table 7.3.

Beyond 2016 provision will be made across the region for an annual 2% compound increase in the regional total of plots, equating to at least **76 additional plots between 2016 and 2021**. The proportion of this regional total to be accommodated in each district should be the same as its share of the regional requirement for 2007-16*. A co-ordinated review of sub-regional Gypsy and Traveller Accommodation Assessments should be undertaken by 2013 to provide the evidence base for a subsequent review of this policy.

Local Planning Authorities should take account of the specific needs of Travelling Showpeople. In doing so they should work with housing and other professionals, site managers, local Travelling Showpeople and settled communities, to achieve levels of provision required by 2016, as soon as possible across a range of sites and tenures through:

- the development management process, particularly when opportunities present themselves in respect of new major developments; and
- the identification of sufficient sites in Development Plan Documents.

Sites should be identified having regard to: Circular 04/2007 and PPS3, the spatial priorities in RDF1 and RDF2, Green Belts in RDF4, and relevant principles set out in the DP policies and policies EM5, L1 and L5.

The preparation of joint or co-ordinated Development Plan Documents between two or more districts, to identify suitable locations for plots is encouraged and where they are produced provision can be redistributed across the areas concerned.

* The 2% annual compound increase is applied to the regional plot total at 2016 in Table 7.3 (729) for as many years into the future as is necessary to tie in with the end date of a given authority's DPD, i.e. by multiplying 729 by 1.02 for each year after 2016 that the DPD would run. The proportion of this regional increase from 2016 to be attributed to that authority is established by expressing its 2007-2016 residential plot requirement as a percentage of the regional requirement of 285 (from Table 7.3, column 2). This percentage share is then applied to the post 2016 regional requirement already calculated..

District	<i>Current Authorised Provision in 2007</i>	Minimum Additional Plots Required 2007- 2016	<i>Proposed Provision of Plots at 2016</i>

No recommendations for change

POLICY RT2 MANAGING TRAVEL DEMAND

5th bullet recommended to read

- Incorporate maximum parking standards that are in line with, or more restrictive than, **Table 8.1**, with local authorities defining the precise boundaries of the proposed Area Accessibility Categories. Parking for disabled people's vehicles, motorcycles and cycles are the only situations where minimum standards will be applicable.

Not issued

RECOMMENDED CHANGES TO TABLE 8.1

Blank cells indicate no change to the submitted draft version

Additional comments and considerations recommended are in addition to those already in the submitted Table 8.1

The Panel's reason for recommending the deletion of the Accessibility Questionnaire column are given in Chapter 10

Class* (see footnotes at end of table)	Broad Land Use	Specific Land Use	Area Type A	Area Type B	Area Type C	Disabled Parking		Bicycles (Minimum)	Motorcycle (Minimum)	Coaches***		Comments	Considerations	
			All areas are Gross Floor Area unless otherwise stated			Up to 200 bays (Minimum)	Over 200 bays (Minimum)			Parking (Minimum)	Drop Off (Minimum)		Parking Management and Design	Sustainable Travel
			All areas are Gross Floor Area unless otherwise stated			All areas are Gross Floor Area unless otherwise stated								See Guidance on Transport Assessment for Travel Plan thresholds
A1	Shops	Food Retail										Include a comment on the potential need to consider taxi parking.		
		Non-Food Retail								Negotiated on a case-by-case basis	Negotiated on a case-by-case basis	Include launderettes in the list		
		Retail warehouses								Negotiated on a case-by-case basis	Negotiated on a case-by-case basis	Include a definition of retail warehouses. DIY stores may need overflow provision at peak times		
A2	Financial and Professional Services	Banks/ Building societies, betting offices, estate and employment agencies, professional and financial services												
A3	Restaurants and Cafes	Restaurants, Cafes/Shack Bars, fast food & drive through											Delete "retail" in point a)	
A4	Drinking Establishments	Public Houses/Wine Bars/Other Drinking Establishments												
A5 NEW ROW	Hot Food Takeaways	Fast Food & Drive Through	Standards for A3 should be used as a starting point for any local standards and/or for negotiations on a case by case basis									Scope may exist to share parking provided in surrounding developments		
B1	Business	Office, Business Parks, Research and Development										The economic consequences of parking levels should be given particular consideration in regeneration and rural areas		
		Call Centres												
B2	General Industry	General Industry												

Class* (see footnotes at end of table)	Broad Land Use	Specific Land Use	Area Type A	Area Type B	Area Type C	Disabled Parking		Bicycles (Minimum)	Motorcycle (Minimum)	Coaches***		Comments	Considerations	
			All areas are Gross Floor Area unless otherwise stated			Up to 200 bays (Minimum)	Over 200 bays (Minimum)			Parking (Minimum)	Drop Off (Minimum)		Parking Management and Design	Sustainable Travel
			All areas are Gross Floor Area unless otherwise stated			All areas are Gross Floor Area unless otherwise stated								See Guidance on Transport Assessment for Travel Plan thresholds
B8	Storage and distribution	Storage and Distribution										Use as a starting point for discussions. Tighter provision may be appropriate for highly automated distribution hubs		
C1	Hotels	Hotels, boarding and guesthouses												
C2*	Residential Institutions	Residential care homes/ Nursing homes	1 per 5 beds		1 per 4 beds									
		Sheltered accommodation	1 space per 3 beds		1 space per 2 beds									
		Student halls of residence NEW ROW	4NW to include standards based on experience including those of Lancashire districts in operating the previous Joint Structure Plan standard											
C3	Dwelling houses**	1 bedroom										Where some or all spaces are provided on an unallocated basis, reduced provision may be appropriate. Garage spaces are not included within the standards. If they are provided and their long term use for vehicle storage is protected by planning condition it may be appropriate to include them.		
		2 to 3 bedrooms												
		4+ bedrooms												
D1*	Non-residential institutions	Clinics and health centres (excludes hospitals)											Parking requirements must reflect the likely proportion of disabled visitors	
		Crèches, day nurseries and day centres												
		Schools (Primary and Secondary)												
		Art galleries, museums, libraries												
		Halls and places of worship												
		Higher and Further Education											The total number of students attending should be used not their full time equivalent	

Class* (see footnotes at end of table)	Broad Land Use	Specific Land Use	Area Type A	Area Type B	Area Type C	Disabled Parking		Bicycles (Minimum)	Motorcycle (Minimum)	Coaches***		Comments	Considerations	
			All areas are Gross Floor Area unless otherwise stated			Up to 200 bays (Minimum)	Over 200 bays (Minimum)			Parking (Minimum)	Drop Off (Minimum)		Parking Management and Design	Sustainable Travel
			All areas are Gross Floor Area unless otherwise stated			All areas are Gross Floor Area unless otherwise stated								See Guidance on Transport Assessment for Travel Plan thresholds
D2*	Assembly and leisure	Cinemas, bingo and casinos, conference centres, music and concert halls										If the number of seats is unknown at the application stage, the ratios for General Leisure uses should be used		
		General leisure: Dance halls (but not night clubs), swimming baths, skating rinks and gymnasiums												
.*	Miscellaneous/ Sui Generis (Examples)	Theatres												
		Motor car showrooms												
		Petrol Filling Stations												

*** Exclusions (NEW SECTION)**

C2 Boarding schools, residential colleges and training centres: assess parking demand based on anticipated travel patterns and modal share. Use D1 schools' standards as a starting point for boarding schools.

C2A: Secure residential units: assess case-by-case based on staff and visitor requirements.

C2 Hospitals: assess case-by-case depending on the range of functions contained, in consultation with health trusts and staff and patient groups. Define parking levels and management through a comprehensive and enforceable Travel Plan covering staff, patients and visitors.

D1 Law courts: only a small scale of non-operational parking likely to be required for town and city centre locations.

D2 Outdoor leisure: local authorities should develop parking standards for the more common outdoor leisure land uses within their area.

D2 Arenas and stadia: negotiate case-by-case taking account of settlement location including parking issues in the surrounding area, potential improvements to transport and accessibility, size of the facility and range and type of events proposed, seasonality and frequency of use, attached mix of uses, coach parking levels, and in respect of extensions/redevelopment of existing facilities existing parking provision, and parking and transport facilities operated at the development being replaced.

Miscellaneous

Night clubs: taxi rank facilities likely to be required. Use of other public car parking in town or local centres usually possible.

Amusement arcades: Use of other public car parking in town or local centres usually possible.

Airports: include parking in airport masterplans and surface access strategies through consultation between airport operators, local authorities and the Highways Agency.

Ports: use A2 offices and B8 distribution standards above as a starting point on staff parking levels. Negotiate non-operational parking e.g. for drop-off of ferry foot passengers case-by-case.

Events: negotiate case-by-case and ensure good traffic management systems in operation.

** The residential standards relate to allocated parking, ie within the curtilage of a plot or communal parking specifically reserved for the use of one residential property. Unallocated residential parking is provided on a communal basis, where no one property is given specific rights to reserve a space or could be provided on-street.

*** If coach drop-off spaces are provided off the public highway, they may be used as coach parking spaces. Local Authorities to define local coach standards, taking account of locally available coach parking and pick-up/drop-off facilities.

APPENDIX B LIST OF PANEL RECOMMENDATIONS

2 Scale of Gypsy and Traveller pitch provision to 2016

- R2.1 If footnote 1 remains in full in the final version of Policy L6, insert “whatever their race or origin, including such persons” after habit of life [para 2.12].
- R2.2 Revise the permanent residential pitch requirement for the region such that it becomes at least 890 instead of 825 over the 2007-2016 period by:
- adding 50 to allow for those on unauthorised encampments seeking permanent residential pitches (Greater Manchester) [para 2.23];
 - adding 25 to avoid any deduction for pitch turnover (Merseyside and Cheshire sub-regions) [para 2.25]; and
 - subtracting 10 to allow for a seeming overestimate of households on unauthorised encampments and through new household formation (Blackburn with Darwen element of the Lancashire sub-region) [para 2.26].
- R2.3 Strengthen the supporting text to give a greater sense of urgency in meeting the backlog of accommodation needs [para 2.34].
- R2.4 In draft Policy L6, 3rd paragraph sentences 1 and 2, clarify the intended method of taking forward pitch requirements beyond 2016 using the same district distribution as 2007-2016 [para 2.40].
- R2.5 In draft Policy L6, 3rd paragraph sentence 1, revise the residential pitch provision for the 2016-2021 period to read at least 296 additional pitches to reflect revisions to the baseline figures and to the 2007-2016 requirement [para 2.41].
- R2.6 Amend draft Policy L6, 3rd paragraph sentence 3 to require a co-ordinated review of GTAAAs "by" 2013 and not "in" 2013 [para 2.42].

3 Distribution of Gypsy and Traveller residential pitch provision

- R3.1 Amend Table 7.2 to include revised figures for current authorised provision in 2007 in 8 specified districts [para 3.22].

Cumbria

- R3.2 Increase the residential pitch requirement 2007-2016 for Copeland from 0 to 2 [para 3.27].
- R3.3 Increase the residential pitch requirement 2007-2016 for Barrow-in-Furness from 0 to 6 [para 3.28].
- R3.4 Decrease the residential pitch requirement 2007-2016 for South Lakeland from 10 to 5 [para 3.28].
- R3.5 Decrease the residential pitch requirement 2007-2016 for Eden from 15 to 13 [para 3.28].

R3.6 Decrease the residential pitch requirement 2007-2016 for Allerdale from 15 to 14 [para 3.29].

Lancashire sub-region

R3.7 Decrease the residential pitch requirement 2007-2016 for Blackburn with Darwen from 45 to 35 pitches [para 3.34].

Greater Manchester

R3.8 Increase the residential pitch requirement 2007-2016 for each local authority in Greater Manchester by 5 pitches with a corresponding decrease in transit pitches in each authority [para 3.40].

Merseyside

R3.9 Increase the residential pitch requirement 2007-2016 for Knowsley from 10 to 13 pitches [para 3.44].

R3.10 Increase the residential pitch requirement 2007-2016 for Wirral from 10 to 13 pitches [para 3.44].

R3.11 Increase the residential pitch requirement 2007-2016 for Sefton from 15 to 17 pitches [para 3.44].

R3.12 Increase the residential pitch requirement 2007-2016 for Liverpool from 15 to 17 pitches [para 3.44].

Cheshire sub-region

R3.13 Increase the residential pitch requirement 2007-2016 for Cheshire East from 60 to 63 pitches [para 3.49].

R3.14 Increase the residential pitch requirement 2007-2016 for Cheshire West and Chester from 45 to 48 pitches [para 3.49].

R3.15 Increase the residential pitch requirement 2007-2016 for Warrington from 10 to 23 pitches [paras 3.46 & 3.49].

R3.16 Decrease the residential pitch requirement 2007-2016 for St Helens from 30 to 28 [paras 3.47 & 3.49].

R3.17 Decrease the residential pitch requirement 2007-2016 for Halton from 45 to 43. [paras 3.47 & 3.49]

4 Transit provision

R4.1 Decrease the regional requirement for new transit pitches from 270 to 220 by reducing those in Greater Manchester from 100 to 50 pitches, spread equally between the 10 constituent authorities [paras 2.23 & 4.22-4.23].

R4.2 In draft Policy L6, delete the 4th paragraph on temporary accommodation for major festivals [para 4.31].

- R4.3 In draft Policy L6, 2nd paragraph sentence 2, insert “*formal*” before “*transit pitches by 2016*” [para 4.33].
- R4.4 Substitute “*formal*” transit pitches Table 7.2 final column heading instead of the misleading term “*residential*” transit pitches [para 4.33].
- R4.5 Clarify the supporting text to differentiate the need for formal transit pitches from a variety of other forms of informal accommodation [para 4.32]

5 Scale of plot provision for Travelling Showpeople

- R5.1 In draft Policy L7 2nd paragraph sentence 1 substitute:
- 2% instead of 3% [para 5.19];
 - at least 76 plots between 2016 and 2021 instead of 122 [para 5.21]; and
 - “*plot*” instead of “*pitch*” [para 5.22].
- R5.2 In draft Policy L7, 2nd paragraph sentences 1 and 2, clarify the intended method of taking forward plot requirements beyond 2016 using the same district distribution as 2007-2016 [para 5.21].
- R5.3 In draft Policy L7 delete the 3rd paragraph on temporary accommodation [para 5.27].

6 DISTRIBUTION OF TRAVELLING SHOWPEOPLE PLOT PROVISION

No recommendations for change

7 Guidance for making allocations for Gypsies and Travellers and Travelling Showpeople in Local Development Frameworks

- R7.1 Revise draft Policy L7, 4th paragraph, bullet 2 to read “*the identification of sufficient sites in Development Plan Documents*”, rather than “*the preparation of Local Development Documents*” [para 7.3].
- R7.2 Substitute Development Plan Documents for Local Development Documents in draft Policy L6 5th and 7th paragraphs, and in draft Policy L7 6th paragraph [see also R7.1] [para 7.7].
- R7.3 In draft Policy L7, 4th paragraph, sentence 1 delete the reference to the specific needs “*of different groups*” of Travelling Showpeople [para 7.15].
- R7.4 In draft Policies L6 and L7 penultimate paragraphs, include an additional cross-reference to Policy RDF4 on Green Belts [para 7.31].
- R7.5 Restructure and simplify the supporting text to give a common introduction to both Policies L6 and L7, with specific points relevant to only Gypsies and Travellers following Policy L6 and those relevant only to Travelling Showpeople following Policy L7 [see also R2.3, 4.5 and 8.1] [paras 7.33-7.43].

8 Delivery of sites, monitoring and review

R8.1 Strengthen the supporting text on delivery mechanisms in our suggested common introduction to Policies L6 and L7 [para 8.17].

In process terms:

R8.2 Separate out any new pitches or plots on temporary permissions when monitoring performance against the requirements in Tables 7.2 and 7.3 [para 8.19].

In process terms:

R8.3 Invite local authorities to include any observations on management issues affecting the availability of pitches or plots in submitting their annual monitoring returns [para 8.20].

10 Non-residential development car parking standards

R10.1 Correct the transposition error between Area Accessibility Categories A and C for both C2 Residential institutions categories [para 10.15], and the typing error in the first Considerations column for A2-A4 [paras 10.13].

R10.2 Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A for A1 Non-food retail [para 10.12], A1 Retail warehouses [para 10.12], B1 Office, business parks, and R&D [para 10.8], B8 Storage and distribution [para 10.14], D1 Higher and further education [para 10.19], and D2 Cinemas etc [para 10.21].

R10.3 Add new land use categories to Table 8.1 for A5 Fast food outlets [para 10.25] and C2 Student halls of residence [para 10.20].

R10.4 Add guidance on excluded categories as new footnotes to Table 8.1, as specified in our recommended changes in Appendix A [para 10.28].

R10.5 Clarify that operational parking is additional to the standards in Table 8.1 in paragraph 28 of the supporting text [para 10.31].

11 Accessibility considerations: area categories and questionnaire

R11.1 In Policy RT2, amend the last part of sentence 1 of the revised final bullet point to read: “*with local authorities defining the precise boundaries of the proposed Area Accessibility Categories*”. [para 11.15].

R11.2 Expand the supporting text at paragraph 29 to include an explanation of the settlement centre types within each Area Accessibility Category, together with a statement that sub-regions should agree the method by which AAC boundaries should be defined by their constituent local authorities [para 11.16].

R11.3 Delete the Accessibility Questionnaire from the draft policy approach [para 11.25], with consequential amendments to paragraph 29 of the supporting text to indicate the factors that should influence negotiations between development management officers and developers on any reduction in parking standards [para 11.31-11.32].

- R11.4 If R11.3 is not accepted, the Accessibility Questionnaire should be amended:
- to delete the subjective elements such that it results in a wholly quantitative and objective questionnaire [paras 11.26-11.28];
 - to apply only to developments exceeding 500 sqm gross floor area [para 11.29]; and
 - and in respect of the accompanying chart at paragraph V of Appendix 1 such that the maximum points total for a very high rating reads 44 not 47 [para 11.30].

12 Residential parking standards

- R12.1 Amend the standard for one bedroom dwellings in Area Accessibility Category A to a maximum of one space not a range of 0.5-1 space [para 12.7]
- R12.2 State in the supporting text paragraph 28 that visitor parking is included in all the standards set out in Table 8.1 [para 12.10].
- R12.3 Add supporting text in a new paragraph 29A to emphasise the local circumstances that should be taken into account in setting local residential standards in LDDs [para 12.11]
- R12.4 Add supporting text in a new paragraph 29A setting the circumstances in which residential parking provision below the maximum levels might be negotiated within all 3 Area Accessibility Categories [para 12.12].
- R12.5 Add the definitions of allocated and unallocated parking and garage space, and their relevance to negotiating reduced parking, to the Comments column of Table 8.1 [para 12.14].

13 Other parking standards

- R13.1 Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A on parking for disabled people for D1 Clinics and Health Centres [para 13.6].
- R13.2 In the supporting text paragraph 31 on parking for disabled people:
- acknowledge that local authorities should take a practical approach to the minimum standards when assessing the disabled parking requirements of small scale developments [para 13.5];
 - mention the potential need for local planning authorities to consider parking provision for mobility scooters [para 13.7]; and
 - state categorically that the disabled parking requirements are additional to the car parking standards [para 13.10].
- R13.3 Add additional comments as specified in our recommended changes to Table 8.1 in Appendix A on coach parking and drop-off for A1 non-food retail and retail warehouse uses [para 13.23].
- R13.4 In the supporting text to draft Policy RT2:
- separate out guidance on cycling and motorcycles, from coach parking [para 13.25];
 - delete all references to HGVs from paragraph 30 [para 13.27];

R13.5 In Table 8.1:

- include “(minimum)” in the heading boxes for parking for disabled people, bicycles and coaches [para 13.26];
- highlight the potential need to consider taxi parking in the Comments box for A1 food retail use [para 13.29].

R13.6 In Policy RT2, amend sentence 2 of the revised final bullet point to read: “Parking for disabled people’s *vehicles*, motorcycles...” [para 13.30].

R13.7 Delete Appendix 1 of the Partial Review having transferred relevant guidance into Table 8.1 and into the supporting text (see also R10.4, 11.2-11.3, 12.3-12.5) [para 13.31].

Not issued

APPENDIX C EXAMINATION IN PUBLIC PROCESS

In July 2009, 4NW, the Regional Leaders' Board, approved draft policies of the Partial Review of the North West Plan, covering accommodation for Gypsies and Travellers, accommodation for Travelling Showpeople, and regional parking standards.

The Partial Review document was submitted to the Secretary of State on the 27th July 2009. There followed a 12 week public consultation period during which responses were sent to the Panel Secretary. The consultation closed on 19th October 2009. In March 2010 the soundness of the draft policies was tested at an Examination in Public which provided an opportunity for discussion on matters selected by an independent Panel.

Responses to the Public Consultation

The Panel Secretary received representations from 69 parties comprising 34 local authorities and local authority groups, 19 town/parish councils and 16 other organisations and individuals. The representations contained over 300 separate comments.

The majority of representations received were on the draft policies on Gypsy and Traveller accommodation. Across all of the three draft policies there were some objections, some representations in support and some in the form of observations. Many objections were on matters of detail, and overall there was relatively little challenge to the principles of the draft policies.

List of Matters and Participants

The Panel analysed the responses and, following consultation with 4NW and GONW, published the Draft List of Matters and Participants on 18th November 2009. The Draft List proposed the matters to be discussed at the Examination in Public sessions and the participants invited to discuss those matters.

The Draft List included around three-quarters of respondents and also some additional 'Panel invites', especially in relation to the debate on parking standards in order to get a broader representation from business interests and users.

The Draft List was subject to a 28 day consultation period during which 18 responses were received. All the comments were reviewed, again in consultation with 4NW and GONW, and a Final List of Matters and Participants was issued on 8th January 2010. In the Final List there were a few minor changes to the questions and their order, and also a few changes to the participants.

Pre-Examination Meeting

A Pre-Examination Meeting was held on 30th November 2009 at the Barnes Wallis Building, Sackville Street Campus, University of Manchester. This meeting provided the opportunity to explain the thinking behind the Draft List of Matters and Participants, to seek a common understanding of information sources, to give guidance on preparation work for the Examination and guidance on the conduct of the debates.

Data Meeting

To assist with understanding the factual information behind the draft policies, a Data Meeting was held on 19th January 2010 at the Barnes Wallis Building, University of Manchester,

facilitated by the Panel. The meeting covered Gypsy & Traveller and Travelling Showpeople accommodation issues in the morning, and regional parking standards in the afternoon.

In the morning session there were a series of presentations given by 4NW and representatives from CLG, HCA and the Showmen's Guild. These presentations covered a variety of topics, including, the robustness of the Caravan Count, the composition of the district baseline data (including an update of numbers since the submitted draft), site grants, and the methodology used in the various GTAAs and in the Showmen's Guild surveys.

In the afternoon session the presentations by 4NW covered the background evidence in the consultant's study that had informed the revised parking standards, an update on the application of parking standards in the region, and some broader context on demand management issues. Rossendale BC also gave a demonstration of the electronic calculator devised by Lancashire CC for the Joint Lancashire Structure Plan parking standards.

Statements

Written statements were received from 28 parties by the deadline of 2nd February 2010. There were statements on all of the five matters for debate at the EiP. Almost all were from participants of the matters in question. Other participants confirmed that they were relying on their previous representations.

Panel Tours

Familiarisation Tours were carried out on 5th and 6th November 2009 and 18th and 20th January 2010. The Panel Chair and Panel Inspector were accompanied by the Panel Secretary on all tours and by the assisting PINS Planning Officer on 18th January 2010. The tours involved visiting broad areas and also viewing a sample of Gypsy and Traveller (14 residential plus one transit) and Travelling Showpeople (9) sites from the public highway.

The first Panel Tour included visits to the following areas:

- Carlisle and Appleby-in-Westmorland
- Morecambe and Lancaster
- Pennine Lancashire
- Blackpool and adjoining areas
- Central Lancashire
- Wigan
- St.Helen's
- Warrington

The second Panel Tour involved visits to the following areas:

- Sandbach, Middlewich, Winsford, and the Chester area
- Wirral and Birkenhead
- Liverpool
- Trafford
- Bolton and Farnworth
- Salford
- Manchester and Tameside
- Stockport

The Panel gave brief observations from these visits at the Pre-Examination and Data Meetings respectively.

Examination Library and Website

All documents of relevance to the Examination were catalogued and placed in the Examination Library. A Documents List was prepared and updated throughout the course of the process. Copies of the latest lists were available at each of the meetings. The final Documents List was prepared at the end of the Examination (copy appended at Appendix F to this report).

An Examination website was set up to keep participants and others in touch with preparations for the Examination debates, and to provide a continuing source of information.

http://www.planning-inspectorate.gov.uk/pins/rss/north_west_gypsy_and_traveller/index.html

Documents were available to download or accessed via links on the website. Summaries of representations received were taken from the database set up for the EiP and posted on the website, together with electronically supplied participants' statements. The website also contained the Draft and Final Lists of Matters and Participants, the EiP Timetable, Notes for Participants and Notes of the Pre-Examination and Data Meetings.

Conduct of the Examination debates

The Examination took place over 4 sitting days – Tuesday 2nd March to Friday 5th March 2010 at the Barnes Wallis Building, Sackville Street Campus, University of Manchester. The Examination took the form of a series of round-table topic discussions led by a member of the Panel. There were no formal presentations to the Examination except for an opening statement by 4NW on the first and second days. In addition to the invited participants, the Examination was open to members of the public and other interested persons to observe the proceedings which were recorded. The audio recordings are available at no cost from the link on the Examination website given above.

Acknowledgements

We are grateful to all those organisations who participated in the EiP process. In particular, we would like to thank 4NW for providing a clear audit trail of its background work and for the thoroughness of that work. We also thank GONW who sought to clarify the procedural implications of the introduction to single Regional Strategies to replace Regional Spatial Strategies. We are also grateful for the various maps that it provided to promote discussion at the debates on Gypsy and Traveller and Travelling Showpeople accommodation.

Finally we are grateful for the support of our Panel Secretary, Sarah Baron who ensured the smooth running of all stages within this EiP, and for the technical briefing provided by Chris White, a Higher Planning Officer from the Planning Inspectorate.

APPENDIX D FINAL LIST OF MATTERS AND PARTICIPANTS

North West Gypsy & Traveller and Travelling Showpeople Accommodation and Parking Standards EiP

FINAL LIST OF MATTERS AND PARTICIPANTS 7 January 2010

for EiP between 2 – 5 March 2010
at the University of Manchester, Sackville Street Campus, Manchester

MATTER 1 REGIONAL PARKING STANDARDS

- 1.1 Is it necessary or appropriate to include parking standards for residential uses, and if so, is it appropriate in all parts of the region?
- 1.2 Is the extension of regional car parking standards in draft Policy RT2 Table 8.1²¹³ including to a wider range of land uses and accessibility area categories justified and workable, and are the particular standards specified appropriate?
- 1.3 Is the proposed approach requiring sub-regions to divide their areas into accessibility categories A, B and C sufficiently clear (supporting text para 29 and Appendix 1)? Does it provide for local discretion but still give a reasonable prospect of consistency in application?
- 1.4 Is there sufficient clarity about how and in what circumstances applicants are intended to use the accessibility questionnaire (Appendix 1)? How easy will it be to apply, and will it add value?
- 1.5 What if any lessons can be learnt from the implementation so far of Policy RT2, with particular reference to experiences in Lancashire and Merseyside?
- 1.6 Are the proposed standards for disabled parking, bicycles, motorcycles and coaches appropriate? If not, what approach or alternative standards would be preferable?
- 1.7 Are the proposed arrangements for monitoring how these proposed standards are applied and for their subsequent review sufficiently clear?

Suggested Participants

4NW (2 seats)
GONW (2 seats) (40)
Highways Agency (48)
Confederation of Passenger Transport – Panel invite
Cycling England – Panel invite
East Lancashire Chamber of Commerce – Panel invite
Home Builders' Federation – Panel invite
Institution of Highways and Transportation – Panel invite

²¹³ Alleged errors in Table 8.1 will have been identified and explored in the Data Meeting

Greater Manchester Chamber of Commerce – Panel invite
Disabled Persons Transport Advisory Committee – Panel invite
North & West Lancashire Chamber of Commerce (35) /West Lancashire BC (20)/ (shared seat)
Association of Greater Manchester Authorities (AGMA) (28)
Cumbria County Council (13)/ Lake District National Park Authority (9) (shared seat)
Derbyshire CC (60)
Halton BC (49)
Merseyside Transport Partnership (1)
Preston City Council (29)
Rossendale BC (37)
Trafford Council (39)
Warrington BC (67)
Wirral BC (22)
Campaign to Protect Rural England (CPRE) NW Regional Group (21)
Shocklach Oviatt & District PC (6)

MATTER 2 GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMMODATION: UNDERSTANDING NEEDS

- 2.1a Have all relevant sources and types of Gypsy and Traveller need been identified in the preparation of draft Policy L6, and adequately understood through engagement with relevant communities²¹⁴?
- 2.1b Have the needs of Travelling Showpeople been properly identified in the preparation of draft Policy L7, and adequately understood through engagement with this community?
- 2.2 Do draft Policies L6 and L7 give sufficient emphasis to tackling the backlog of need in the immediate future²¹⁵ to accord with Government objectives in ODPM Circular 01/2006 and CLG Circular 04/2007 respectively?
- 2.3 Is the guidance given for Local Development Document preparation in draft Policies L6 and L7 on making provision in the longer term (between 2016 and 2021) appropriate and clearly expressed, including the application of a 3% annual compound increase²¹⁶?
- 2.4 Have the results of the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) and of the Habitats Directive Assessment been adequately taken into account in preparing draft Policies L6 and L7?

Suggested Participants

4NW (2 seats)
GONW (2 seats) (40)

²¹⁴ 4NW's Technical Background Paper summarises the needs components included within draft Policies L6 and L7. This question invites discussion on any additional categories of need, e.g. from inter-regional migration, East European Roma, concealed households in bricks and mortar aspiring to return to caravans, New Travellers, temporary stopping places for fairs/festivals

²¹⁵ ODPM Circular 01/2006, para 12c includes an objective to clear the backlog for Gypsy and Traveller pitches in the 2006-2011 period, and CLG Circular 04/2007, para 14(a) includes the same objective for Travelling Showpeople in the 2007-2012 period

²¹⁶ The origins of the 3% figure and the intended arithmetic to produce a 2016-21 distribution by District will have been discussed in the Data Meeting

Dept of Health/NHS NW (50)
Natural England (41)
Cheshire Sub-Regional Partnership Gypsy and Traveller Coordinator – Panel invite
Heine Planning (18)
Irish Traveller Movement in Britain (69)
Irish Community Care Merseyside (23)
Northern Network of Travelling People - Panel invite / Home Space Sustainable
Accommodation CIC (17) (shared seat)
Showmen’s Guild of Great Britain (55)
Association of Greater Manchester Authorities (AGMA) (28)
Blackburn with Darwen BC (59)
Carlisle City Council (36)
Central Lancashire Authorities (63)
Cheshire West & Chester Council (24)
Cumbria County Council (13) / Allerdale BC (33) / Eden DC – Panel invite
(shared seat)
Hyndburn BC (11)
Lancaster City Council (38) / Heaton with Oxcliffe PC (3) (shared seat)
Merseyside Policy Unit (65) / Liverpool City Council (61)
Salford City Council/Rochdale BC – Panel invite (shared seat)
Campaign to Protect Rural England (CPRE) NW Regional Group (21)
Mollington Parish Council (42)
Tilston Parish Council (7)

MATTER 3 TRAVELLING SHOWPEOPLE ACCOMMODATION: SCALE, DISTRIBUTION AND DELIVERABILITY

- 3.1 Is the proposed regional provision (minimum 285 plots between 2007 and 2016) adequately based on the evidence available (including the findings of the GTAAs and the Travelling Showmen's Guild survey²¹⁷)?
- 3.2a Is the proposed scale and balance of residential plots between sub-regions appropriate based on both needs and ability to accommodate them?
- 3.2b Is the proposed distribution of such plots between Districts in Table 7.3 appropriate based on both needs and ability to accommodate them?
- 3.3 Is there any justification for the provision of any authorised temporary accommodation and/or stopping places, and is this addressed adequately in draft Policy L7?
- 3.4 Are the mechanisms for delivering the required plots expressed sufficiently clearly, including:
- i) through Local Development Documents (draft Policy L7 and supporting text para 22);
 - ii) diversity and engagement (supporting text para 22);
 - iii) tenure (supporting text para 25);
 - iv) funding; and

²¹⁷ A common understanding of factual information on existing authorised (permanent and temporary) and unauthorised provision, and on needs and preferences, from the GTAAs and the Travelling Showmen's Guild survey, will have been sought through the data meeting as a precursor to this discussion

- v) any other issues?

Suggested Participants

4NW (2 seats)
GONW (2 seats) (40)
Showmen's Guild of Great Britain (2 seats) (55) with Planning Aid to support
Association of Greater Manchester Authorities (AGMA) (28) / Bolton Council –
Panel invite (shared seat)
Allerdale BC (33)
Blackpool Council (31)
Bury Council (44)
Central Lancashire Authorities (63)
Cheshire East Council (62)
Cumbria County Council (13)
Lancaster City Council (38)
Merseyside Policy Unit (65)
St Helens MBC (30)
Tameside BC – Panel invite
Warrington BC (67)
Campaign to Protect Rural England (CPRE) NW Regional Group (21)
Lathom South Parish Council (56)
Tilston Parish Council (7)

MATTER 4 GYPSY AND TRAVELLER ACCOMMODATION: SCALE, DISTRIBUTION AND DELIVERABILITY

- 4.1 Is the proposed regional provision (minimum 825 permanent residential pitches between 2007 and 2016) adequately based on the evidence available (including current numbers of pitches subject to temporary permissions, unauthorised pitches and the findings of the GTAAs²¹⁸)?
- 4.2 Are the factors which have led to the proposed redistribution of permanent residential pitches between Districts clear and appropriate, including:
- i) Gypsy and Traveller preferences;
 - ii) employment and transport opportunities;
 - iii) landscape, conservation and flood risk issues; and
 - iv) any other important factors?
- 4.3a Is the overall scale and balance of permanent residential pitches between sub-regions appropriate based on both needs and ability²¹⁹ to accommodate them?
- 4.3b Is the scale and balance of such pitches between Districts in Table 7.2 appropriate based on both needs and ability to accommodate them?
- 4.4 Is the proposed regional provision for transit pitches (minimum 270 pitches 2007-2016) adequately based on the evidence available (including the current numbers of unauthorised encampments and the findings of the GTAAs)? And does its proposed

²¹⁸ A common understanding of factual information on existing authorised (permanent and temporary) and unauthorised provision from the caravan counts & GTAAs, and on needs and preferences from the GTAAs and the benchmarking exercise, will have been sought through the data meeting as a precursor to this discussion

²¹⁹ The factors influencing needs and ability to accommodate them are as outlined in question 4.2

distribution between Districts reflect Gypsy and Traveller preferences and deliverability considerations (draft Policy L6 supporting text para 7)?

- 4.5 Are the mechanisms for delivering the required pitches expressed sufficiently clearly, including:
- i) diversity and engagement (draft Policy L6 supporting text para 8);
 - ii) tenure (supporting text para 13);
 - iii) funding; and
 - iv) any other issues?

Suggested Participants

4NW (2 seats)

GONW (2 seats)

Irish Traveller Movement in Britain (69)

Irish Community Care Merseyside (23)

Heine Planning (18)

Home Space Sustainable Accommodation CIC (17) /Cheshire G&T Voice –
Panel invite (shared seat)

Northern Network of Travelling People - Panel invite

Friends, Families and Travellers and Traveller Law Reform Project – Panel invite

Association of Greater Manchester Authorities (AGMA) (28)

Blackburn with Darwen BC (59)

Bury Council (44) / Trafford Council (39) (shared seat)

Cheshire West & Chester Council (24) / Cheshire East Council (62) (shared seat)

Cumbria County Council (13)

Fylde BC (12) / Central Lancashire Authorities (63) (shared seat)

Halton BC (49)

Hyndburn BC (11) / Blackpool Council (31) (shared seat)

Merseyside Policy Unit (65)/ Liverpool City Council (61) (shared seat)

Pendle BC (47)/Burnley BC (46) (shared seat)

Stockport BC – Panel invite

Warrington BC (67)

Wirral BC (22)

Campaign to Protect Rural England (CPRE) NW Regional Group (21)

Pickmere Parish Council (16)

Poynton Town Council (2)

MATTER 5 GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE ACCOMMODATION: GUIDANCE FOR LOCAL DEVELOPMENT DOCUMENTS AND RSS REVIEW

- 5.1 Does draft Policy L6 give an appropriate steer to the subsequent allocation of land in Local Development Documents, in the context of ODPM Circular 01/2006, para. 30, in respect of:
- i) locational criteria (supporting text paras 8 and 9);
 - ii) site size and characteristics (paras 8 and 10);
 - iii) rural exceptions sites (para 11);
 - iv) Green Belt (para 12);
 - v) any other relevant issues?

- 5.2 Does draft Policy L7 give an appropriate steer on the suitability of potential sites to accommodate Travelling Showpeople, in the context of CLG Circular 04/2007, para. 24, in respect of:
- i) locational criteria including the need to accommodate storage and maintenance uses (supporting text paras 21 - 23);
 - ii) site size and characteristics (paras 21 and 22);
 - iii) rural exceptions sites (para 23);
 - iv) Green Belt (para 24);
 - v) any other relevant issues?
- 5.3 Are the proposed arrangements for monitoring pitch provision and review of requirements adequately expressed (including the review of GTAAs by 2013, draft Policies L6 and L7)?

Suggested Participants

4NW (2 seats)
GONW (2 seats)
Heine Planning (18)
Irish Community Care Merseyside (23)
Irish Traveller Movement in Britain (69)
Showmen's Guild of Great Britain (55)
Northern Network of Travelling People – Panel invite /
Home Space Sustainable Accommodation CIC (17) (shared seat)
Friends, Families & Travellers and Traveller Law Reform Project – Panel invite
Association of Greater Manchester Authorities (AGMA) (28)
Central Lancashire Authorities (63)
Cheshire West & Chester Council (24) / Cheshire East Council (62) (shared seat)
Allerdale BC (33)
Cumbria County Council (13)
Liverpool City Council (61)
West Lancashire BC (20)
Campaign to Protect Rural England (CPRE) NW Regional Group (21)
Mollington Parish Council (42)
No Mans Heath & District Parish Council (26)

APPENDIX E EIP PROGRAMME

North West Gypsy & Traveller and Travelling Showpeople Accommodation and Parking Standards EiP

EiP TIMETABLE: 2 – 5 MARCH 2010

VENUE: Harwood Room, Barnes Wallis Building, The University of Manchester, Sackville Street campus, Manchester M1 7JR

Tuesday 2 March	10.00 – 12.45 14.00 – 16.45	Introduction by Panel Chair Opening Statement on Regional Parking Standards by 4NW Matter 1 – Regional Parking Standards
Wednesday 3 March	10.00 – 12.45	Introduction by Panel Chair Opening Statement on Gypsy and Traveller and Travelling Showpeople Accommodation requirements by 4NW Matter 2 – Gypsy and Traveller and Travelling Showpeople Accommodation: Understanding Needs
Wednesday 3 March	14.00 – 16.45	Matter 3 – Travelling Showpeople Accommodation: Scale, Distribution and Deliverability
Thursday 4 March	10.00 – 12.45 14.00 – 16.45	Matter 4 – Gypsy and Traveller Accommodation: Scale, Distribution and Deliverability
Friday 5 March	10.00 – 12.45	Matter 5 – Gypsy and Traveller and Travelling Showpeople Accommodation: Guidance for LDDs and RSS Review
Friday 5 March	14.00 – 15.30	Reserve session

Please note that every attempt will be made to start sessions on time, but some sessions may overrun their allotted finish time. A reserve session is identified in the event that it has not been possible to finish any Matter despite sitting late.

NB Matters are numbered in a different order to that followed in the submitted draft RSS review, July 2009. The suggested order of debates is organised to avoid splitting any Matters between 2 days, hence making travel arrangements easier for participants.

APPENDIX F DOCUMENTS LIST

PART A - CORE DOCUMENTS

http://www.planning-inspectorate.gov.uk/pins/rss/north-west-gypsy-and-traveller/core-documents.html		
Ref.	Title	Date
	Existing Regional Spatial Strategy (RSS)	
RSS1	North West of England Plan, Regional Spatial Strategy to 2021, Government Office for the North West and Department for Communities & Local Government	Sept 2008
RSS2	Report of the Panel, North West Draft Regional Spatial Strategy, EIP October 2006 – February 2007	Mar 2007
RSS3	RSS Annual Monitoring Report for the North West of England, 4NW	Feb 2009
RSS4	RSS Annual Monitoring Report for the North West of England, 4NW	Feb 2010
	Submitted Draft RSS Partial Review (PR) policy document and associated package of documents, July 2009	
PR1	Submitted Draft North West Plan Partial Review, 4NW	July 2009
PR2	Availability Statement, 4NW	July 2009
PR3	Pre-submission Consultation Statement, 4NW	July 2009
PR4	Revision Matters, 4NW	July 2009
PR5	Sustainability Appraisal Report Final Report for Submission, prepared by Scott Wilson for 4NW	July 2009
PR6	Sustainability Appraisal Report – Non-Technical Summary, Final Report for Submission, prepared by Scott Wilson for 4NW	July 2009
PR7	Technical Background Paper – Gypsies & Travellers and Travelling Showpeople Pitch Provision, 4NW	July 2009
PR8	Information Note for the EiP Panel – Reports and Minutes to Members of the Regional Planning Body on the Development of the Partial Review	October 2009
	RSS Partial Review: interim policies and earlier consultation	
PRE1	Interim draft policies Sustainability Appraisal, prepared by Scott Wilson for 4NW	Mar 2009
PRE2	Interim draft policies Sustainability Appraisal Non-Technical Summary, prepared by Scott Wilson for 4NW	Mar 2009
PRE3	Interim draft policies Sustainability Appraisal Appendices, prepared by Scott Wilson for 4NW	Mar 2009

PRE4A PRE4B PRE4C PRE4D PRE4E	Notes of dialogue meetings with Gypsies and Travellers: Cheshire/Merseyside Gypsies & Travellers Greater Manchester Gypsies & Travellers Lancashire Gypsies & Travellers Cumbria Gypsies & Travellers North West Region Gypsies & Travellers Notes by CAG consultants	Feb & Mar 2009
PRE5A PRE5B PRE5C PRE5D	Notes of dialogue meetings with Travelling Showpeople: Merseyside Travelling Showpeople Greater Manchester Travelling Showpeople Lancashire Travelling Showpeople Cumbria Travelling Showpeople Notes by CAG consultants	Feb & Mar 2009
PRE6	Consultation on Interim Draft Policies: Gypsies & Travellers, prepared by CAG consultants for the North West Regional Assembly	Mar 2009
PRE7	Consultation on Interim Draft Policies: Travelling Showpeople, prepared by CAG consultants for the North West Regional Assembly	Mar 2009
PRE8	Consultation on Interim Draft Policies: Car Parking, prepared by CAG consultants for the North West Regional Assembly	Mar 2009
PRE9A PRE9B	Technical Note on how the Interim Draft Policy Figures for Gypsies and Travellers, and Travelling Showpeople were derived, 4NW Appendix 1 of the Technical Note on how the Interim Draft Policy Figures for Gypsies and Travellers, and Travelling Showpeople were derived, 4NW	Feb 2009
PRE10	Interim Draft Policy L6 – Accommodation for Gypsies and Travellers, Item 11 - Appendix 1 of 4NW’s report to the Regional Leaders Forum, 16 January 2009	Jan 2009
PRE11	Interim Draft Policy L7 – Accommodation for Travelling Showpeople, Item 11 – Appendix 2 of 4NW’s report to the Regional Leaders Forum, 16 January 2009	Jan 2009
PRE12	Interim Draft Policy RT2 (Amendment) – Car Parking Standards, from Item 11 – Appendix 3 of 4NW’s report to the Regional Leaders Forum, 16 January 2009	Jan 2009
PRE13	Consultation Report, Consultation forum on draft Gypsy & Traveller and Travelling Showpeople policies, prepared by CAG consultants for the North West Regional Assembly	Jan 2009
PRE14	Draft Project Plan and Statement of Public Participation (final revised version), North West Regional Assembly	Jan 2009
PRE15	Interim Draft Policies for the Accommodation of Gypsies and Travellers, prepared for the Partial Review Steering Group	Nov 2008
PRE16	Interim Draft Policies for the Accommodation of Travelling Showpeople, prepared for the Partial Review Steering Group	Nov 2008
PRE17	Interim Draft Policies for Regional Car Parking Standards, prepared for	Nov 2008

	the Partial Review Steering Group	
PRE18	Draft Pitch Distribution for the Accommodation for Gypsies and Travellers policy (web forum consultation)	Nov 2008
PRE19	Draft Plot Distribution for the Accommodation for Travelling Showpeople policy (web forum consultation)	Nov 2008
PRE20	Interim policy framework – Gypsies & Travellers, 4NW	Sept 2008
PRE21	Interim policy framework – Travelling Showpeople, 4NW	Sept 2008
PRE22	Interim policy framework – Regional Parking Standards, 4NW	Sept 2008
PRE23	Notes from a workshop to provide public health input to the Sustainability Appraisal held on 4 July 2008, Ben Cave Associates	July 2008
PRE24	Consultation on the Draft Options: Gypsies, Travellers and Travelling Showpeople June – July 2008 Consultation Responses, prepared by CAG consultants for the North West Regional Assembly	July 2008
PRE25	Consultation on the Draft Options: Car Parking June – July 2008 Consultation Responses, prepared by CAG consultants for the North West Regional Assembly	July 2008
PRE26	Gypsies and Travellers Options Paper, CAG Consultants for the North West Regional Assembly	June 2008
PRE27	Travelling Showpeople Options Paper, CAG Consultants for the North West Regional Assembly	June 2008
PRE28A	Car Parking Options Paper, CAG Consultants for the North West Regional Assembly	June 2008
PRE28B	Appendix – Car Parking Options Table 2, North West Regional Assembly	
PRE29	Sustainability Appraisal Report – Issues & Options, prepared by Scott Wilson and Ben Cave Associates for the North West Regional Assembly	June 2008
PRE30	Sustainability Appraisal Report – Issues & Options – Non-Technical Summary, prepared by Scott Wilson and Ben Cave Associates for the North West Regional Assembly	June 2008
PRE31	Strategic Environmental Assessment – Health & wellbeing summary, prepared by Scott Wilson and Ben Cave Associates for the North West Regional Assembly	June 2008
PRE32	Draft Project Plan and Statement of Public Participation (revised version), North West Regional Assembly	May 2008
PRE33	Extracts from the Consultation on the Draft Project Plan February – March 2008, pages 1 to 23 and 53 to 63, prepared by CAG consultants for the North West Regional Assembly	April 2008
PRE34	Sustainability Appraisal Scoping Report Addendum, prepared by Scott	April 2008

	Wilson and Ben Cave Associates for the North West Regional Assembly	
PRE35	Draft Project Plan and Statement of Public Participation, North West Regional Assembly	Feb 2008
PRE36	Sustainability Appraisal of the North West Regional Spatial Strategy - Scoping Report, prepared by Entec for the North West Regional Assembly	Feb 2005
	National Planning Policies and Guidance	
PPS1	PPS1 – Delivering Sustainable Development, the former Office for the Deputy Prime Minister (ODPM), now Department for Communities and Local Government	Jan 2005
PPG2	PPG2 – Green Belts, ODPM	Mar 2001
PPS3	PPS3 – Housing, Department for Communities and Local Government	Nov 2006
Draft PPS4	Consultation draft PPS4 – Planning for Prosperous Economies, Department for Communities and Local Government	May 2009
PPS4	PPS4 - Planning for Sustainable Economic Growth, Department of Communities and Local Government	Dec 2009
PPS7	PPS7 – Sustainable Development in Rural Areas, ODPM	Aug 2004
PPS11	PPS11 – Regional Spatial Strategies, ODPM	Sept 2004
PPS11A	PPS11 – Regional Spatial Strategies (2004), technical amendments, Department for Communities and Local Government	Jan 2009
PPG13	PPG13 – Transport, ODPM	Mar 2001
PPS25	PPS25 – Development and Flood Risk, CLG	Dec 2006
	National Context on Gypsies and Travellers	
GT1	Extract from the Housing Act 2004, sections 225 and 226 on accommodation needs of gypsies and travellers	2004
GT2	Circular 01/06: Planning for Gypsy and Traveller Caravan Sites, ODPM	Feb 2006
GT3	Updated Annex A to Circular 01/06 (ODPM): Planning for Gypsy and Traveller Caravan Sites, Department for Communities & Local Government	Mar 2006
GT4	Preparing Regional Spatial Strategy Reviews on Gypsies & Travellers by Regional Planning Bodies, Communities & Local Government, University of Birmingham, University of Salford and Sheffield Hallam University	Mar 2007
GT5	Local Authorities and Gypsies and Travellers: a guide to responsibilities and powers, Department for Communities & Local Government	May 2007

GT6	Gypsy & Traveller Accommodation Needs Assessments, Guidance, Department for Communities & Local Government	Oct 2007
GT7	The Road Ahead: Final Report of the Independent Task Group on Site Provision and Enforcement for Gypsies and Travellers, Department for Communities & Local Government	Dec 2007
GT8	Gypsy & Traveller Sites Grant Guidance 2008-2011, Department for Communities & Local Government	Mar 2008
GT9	Government response to The Road Ahead: the Final report of the Independent Task Group on Gypsy and Traveller Site Provision and Enforcement, Department for Communities and Local Government	April 2008
GT10	Designing Gypsy & Traveller Sites: Good Practice Guide, Department for Communities & Local Government and the Housing Corporation	May 2008
GT11	Table 1: Count of Gypsy & Traveller Caravans 19 Jan 2009 – Last five counts, Department for Communities & Local Government	May 2009
GT11A	Table 1: Count of Gypsy & Traveller Caravans July 2009 – Last five counts, Department for Communities & Local Government <i>See also Core Doc DMI</i>	Nov 2009
GT12	Progress Report on Gypsy and Traveller Policy, Department for Communities & Local Government	July 2009
	National Context on Travelling Showpeople	
TS1	Circular 04/07: Planning for Travelling Showpeople, Department for Communities & Local Government	August 2007
TS2	Travelling Showpeople's Sites – A Planning Focus Model Standard Package, The Showmen's Guild of Great Britain	Sept 2007
TS3	Best Practice Advice on Provision of Showmen's Permanent Parking Sites, The Showmen's Guild of Great Britain	June 2008
	Government Guidance on Parking Standards	
T1	Traffic Advisory Leaflet 05/05 Parking for Disabled People	April 1995
T2	Manual for Streets, Welsh Assembly Government, Department for Communities & Local Government, Department for Transport <i>Extract on garages submitted by Halton BC</i>	2007
	Regional work on Gypsy & Traveller Accommodation	
RGT1	North West Regional Gypsy and Traveller Accommodation Assessment (GTAA) Executive Summary, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of Birmingham	May 2007
RGT2	North West Regional GTAA Final Report, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of	May 2007

	Birmingham	
RGT3	Merseyside GTAA Executive Summary, Philip Brown, Lisa Hunt and Jenna Condie, University of Salford	Feb 2008
RGT4	Merseyside GTAA Final Report, Philip Brown, Lisa Hunt and Jenna Condie, University of Salford	Feb 2008
RGT5	Cheshire Partnership Area GTAA, Executive Summary, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of Birmingham	May 2007
RGT6	Cheshire Partnership Area GTAA, Final Report, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of Birmingham	May 2007
RGT7	Gypsy and Traveller Accommodation and Service Delivery Needs in Greater Manchester – 2007/8, arc ⁴ for the Association of Greater Manchester Authorities	July 2008
RGT8	Lancashire Sub Regional GTAA, Executive Summary, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of Birmingham	May 2007
RGT9	Lancashire Sub Regional GTAA Final Report, Philip Brown, Lisa Hunt and Andy Steele, University of Salford and Pat Niner, University of Birmingham	May 2007
RGT10	Ribble Valley GTAA Final Report, Lisa Hunt and Philip Brown, University of Salford	Mar 2008
RGT11	Cumbria GTAA Appleby Fair Assessment Final Report, Lisa Hunt, Philip Brown and Jenna Condie, University of Salford	May 2008
RGT12	Cumbria GTAA Executive Summary, Philip Brown, Lisa Hunt and Jenna Condie, University of Salford	May 2008
RGT13	Cumbria GTAA Final Report, Philip Brown, Lisa Hunt and Jenna Condie, University of Salford	May 2008
RGT14	North West Gypsy and Traveller Accommodation Assessments – A Good Practice Guide, Philip Brown, Lisa Hunt, Andy Steele of University of Salford, and Pat Niner, University of Birmingham	May 2007
	Regional work on Travelling Showpeople	
RT1	The Accommodation Situation of Showmen in the Northwest, Dr Colm Power for the Showmen’s Guild – Lancashire Section	June 2007
RT2	The North West’s Travelling Showpeople’s Current Base Location, Preferred Base Location and Operating Patterns, Showmen’s Guild – Lancashire and Cheshire sections	Jan 2009
	Regional work on Parking Standards	
RP1	Review of Regional Parking Standards Executive Summary, report by Mouchel for the North West Regional Assembly	Dec 2008

RP2	Review of Regional Parking Standards Final Report, report by Mouchel for the North West Regional Assembly <i>See also Core Doc DM14</i>	Dec 2008
RP3	Joint Lancashire Structure Plan Technical Appendix 2 Parking Standards, Lancashire County Council	Mar 2005
RP4	Joint Lancashire Structure Plan SPG Access and Parking, Lancashire County Council	Mar 2005
RP5	Ensuring a Choice of Travel Supplementary Planning Document, prepared by Merseyside Local Authorities and Merseytravel and adopted by Liverpool City Council. <i>Submitted by Halton BC</i>	2009
	Data Meeting (19.01.10)	
	<i>Submissions prior to meeting – Gypsy & Traveller and Travelling Showpeople Accommodation</i>	
DM1	Caravan Count July 2009. Table 1 with authorities re-ordered as in table 7.2 of the Partial Review, Department of Communities and Local Government <i>NB Revised version, corrected regional totals</i>	17/01/10
DM2	Current Authorised Provision (Gypsy and Traveller Pitches) in 2007, 4NW	13/01/10
DM3	Baseline information for NW GTAA 2007. Record of private sites in North West (Source SHUSU), 4NW	03/12/09
DM4	Caravan Count July 2009 Table 2. Local authorities and Registered Social Landlord sites, CLG	Nov 2009
DM5	Planning permissions and NW Pitches or Plots Constructed 2007 – 2009, 4NW	13/01/10
DM6	Data submission on Gypsy & Traveller permissions since 2007 and Revision, Cheshire East Council	07/01/10 and 14/01/10
DM6A	Data submission on Gypsy & Traveller and Travelling Showpeople Accommodation, St.Helen's MBC	08/01/10
DM7	Data submission on Gypsy & Traveller Accommodation, Halton Council	08/01/10
DM8	Data submission on Gypsy & Traveller sites, Cheshire West & Chester Council	12/01/10
DM8A	Data submission, update on planning permissions and new pitches/plots constructed 2007 – 2009, Cheshire West & Chester Council	15/01/10
DM9	Data submission on Gypsy & Traveller provision in 2007, Blackburn with Darwen BC	13/01/10 and 14/01/10
DM10	4NW Briefing Note on Gypsy & Traveller Site Grants and Delivery	14/01/10

	Mechanisms, 4NW	
DM11	Extract from 4NW's Technical Background Paper on Gypsy & Traveller and Travelling Showpeople Accommodation, Appendix 1 – Benchmarking GTAA Information, 4NW	July 2009
DM12	Scale and Distribution of Gypsy & Traveller Pitch Provision – 3% Compound Growth 2016-2021, 4NW	13/01/10
DM13	Scale and Distribution of Travelling Showpeople Plot Provision – 3% Compound Growth 2016-2021, 4NW	13/01/10
	<i>Submissions prior to meeting – Parking Standards</i>	
DM14	Technical Background Paper – Regional Parking Standards (summary of background evidence at time of submission July 2009), 4NW	13/01/10
DM15	NW Regional Parking Standards Table, 4NW	13/01/10
DM15A	Amendments to NW Regional Parking Standards Table (note), 4NW	08/01/10
DM16	Draft Written Statement by Halton Borough Council (49) on Matter 1 – Regional Parking Standards, Halton Council	08/01/10
DM17	Joint Lancashire Structure Plan Technical Appendix 2 Parking Standards, Lancashire County Council See Core Doc RP3	Mar 2005
	<i>Presentations</i>	
DM18	4NW presentation on Gypsy & Traveller and Travelling Showpeople Accommodation, Michael Gallagher and Duncan McCorquodale	19/01/10
DM19	Caravan Count robustness, Alison Alleyne, CLG	19/01/10
DM20	Gypsy & Traveller Site Grant Programme HCA Delivery, Caroline Cormack, Homes & Communities Agency	19/01/10
DM20A	Note to Panel on HCA Funding Allocation 2009/10, GONW <i>Submitted post meeting as an update NB Superseded by revised note submitted during EiP. See PD21 in Part B of Documents List</i>	24/02/10
DM21	4NW presentation on Parking Standards, Alec Curley	19/01/10
DM22	Weblink to Lancashire Parking Standards Calculator, Adrian Smith, Rossendale BC	19/01/10
	<i>Submissions post meeting - Gypsy & Traveller and Travelling Showpeople Accommodation</i>	
DM23	Current authorised provision (Gypsy & Traveller pitches) in 2007, Revised version, 4NW	25/01/10
DM24	Planning permissions and NW Pitches or Plots Constructed 2007 – 2009, Revised version, 4NW	25/01/10
DM25	GTAA objections briefing note, Blackburn with Darwen BC	19/01/10
DM25A	Note of Special Meeting held by the Lancashire Leaders' Group at County Hall, Preston <i>Submitted by Blackburn with Darwen BC in response to discussion on the Lancashire GTAA</i>	02/03/09

DM26	Data clarification letter, Trafford MBC	22/01/10
DM27	Clarification on Gypsy & Traveller Pitch Provision within Warrington, Warrington BC (sent in Dec 2009)	25/01/10
DM28	Authorised Gypsy & Traveller Provision within Warrington – Schedule of Sites, Warrington BC (sent to 4NW in Dec 2009)	26/01/10
DM29	RSS Data Form 200809, Warrington BC	26/01/10
DM30	Appeal Decisions Letter by Alan Upward (Planning Inspector) on appeals made by Mr S.J Cubbins in respect of land at Utopia Park, Kepple Lane, Garstang, Lancashire (refs: APP/02370/C/08/2068282 and APP/02370/A/08/2066405)	20/05/09
DM30A	Appeal Decisions Letter by Claire Sherratt (Planning Inspector) on appeals made by Miss J. Finney in respect of land at Wynbunbury Lane, Stapeley, Cheshire (refs: APP/R0660/C/08/2089992 and APP/R0660/A/08/2084074) <i>Submitted by Cheshire East Council</i>	11/11/09
DM31	Strategic Housing Market Assessments. Practice Guidance Version 2. Department for Communities and Local Government <i>Submitted by Halton BC in response to discussion on turnover</i>	Aug 2007
DM31A	Note to Panel regarding the AGMA GTAA study, submitted by AGMA	29/01/10
	<i>Submissions post meeting – Parking Standards</i>	
DM32	Delivering Better Local Transport. Key achievements and Good Practice from the First Round of Local Transport Plans. Prepared by Atkins Transport Planning for the Department for Transport	Dec 2006
DM33	NWDA Places Study – Overview Report, Pion Economics	Aug 2009
DM34	An Audit of Smarter Choices. Implementation in North West England. Final Report. Prepared by Atkins Transport Planning for 4NW	Oct 2009
DM35	Response to Panel Question on Accessibility Standards and Extensions to Existing Development, 4NW	25/01/10
DM36	Stakeholder Consultation – Meeting Record Proforma, Review of Regional Parking Standards, prepared by Mouchel Parkman for the North West Regional Assembly	2007
DM37	Amendments to Parking Standards Table and Supporting Text, 4NW	25/01/10

PART B - PARTICIPANTS DOCUMENTS

http://www.planning-inspectorate.gov.uk/pins/rss/north_west_gypsy_and_traveller/participants_documents.html		
Ref.	Title	Date
PD1	What it's like to live there: the views of residents on the design of new housing, CABE <i>Submitted by 4NW</i>	2005
PD2	Regional Spatial Strategy for the South West. Review of Additional	April 2008

	Pitch Requirements for Gypsies and Travellers. Examination in Public. Report of the Panel. <i>Submitted by 4NW</i>	
PD3	Extract from Halton BC Draft SPD 'Design of New Residential Developments', Halton BC	2009
PD4	Extract from Halton Unitary Development Plan Appendix 1 Transport Parking Standards	2005
PD5	Extract from Guidance on Transport Assessment, Department for Transport <i>Submitted by Halton BC</i>	Mar 2007
PD6	Report of the Urban Renewal Policy and Performance Board on Transit Site Provision, Halton BC	19.09.07
PD7	Study to Identify Potential Gypsy and Traveller and Travelling Showperson Sites in Cheshire West and Chester. Project Brief. Cheshire West & Chester Council	Aug 2009
PD8	Britain's Coaches: Partnership and Passengers, Confederation of Passenger Transport	Jan 2009
PD9	Regional Spatial Strategy Single Issue Review – Planning for Gypsy & Traveller Accommodation in the East of England, Report of Examination in Public Panel <i>Submitted by 4NW</i>	Dec 2008
PD10	Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England – A Revision to the Regional Spatial Strategy for the East of England, GO-East <i>Submitted by 4NW</i>	July 2009
PD11	Regional Spatial Strategy and Local Development Framework. Core Output Indicators – Update 2/2008, Department for Communities and Local Government	July 2008
Information submitted during the EiP		
PD12	Environmental Constraints map submitted by GONW and tabled at EiP sessions on Matters 3 and 4	Mar 2010
PD13	Letter from Trafford MBC on parking standards for motor car showrooms and other parking standards	03/03/10
PD14	Access Statement Guidance, submitted by Disabled Persons Transport Advisory Committee	03/03/10
PD15	Traffic Advisory Leaflet 2/02 Motorcycle Parking, Department for Transport, submitted by GONW on 03/03/10	Mar 2002
PD16	Email from Hyndburn in relation to Matter 2.3 on the application of a 3% annual compound growth	04/03/10
PD17	Extract from the CLG Progress Report on Gypsy and Traveller Policy	Submitted

	(Core Doc GT12), paragraphs 18 and 19, on the issue of Gypsy and Traveller sites being identified in core strategies, submitted by GONW in relation to Matters 3 and 4	04/03/10
PD18	Email from AGMA explaining the approach to transit provision, in relation to Matter 4	04/03/10
PD19	Extract from the draft Greater Manchester GTAA, Appendix 4, Table 7 – Gypsy and Travellers – Alternative Models, submitted by AGMA in relation to Matter 4	Submitted 04/03/10
PD20	Note from GONW on the inclusion of Gypsy and Traveller sites in core strategies, in relation to Matters 3 and 4	04/03/10
PD21	Corrected Note from GONW on the HCA funding allocation (the regional allocation total corrected to £2 million). <i>Refer to Core Doc DM20A for the original note</i>	04/03/10
PD22	Note from GONW on the next steps, as raised in the Matter 5 debate	05/03/10
PD23	Policy Statement on Regional Strategies, Department for Communities and Local Government and Department for Business Innovation and Skills	Feb 2010
PD24	Changes agreed by 4NW during the EiP	Mar 2010

NB. PD documents are in addition to those documents submitted by participants and listed in the Data Meeting section of the Core Documents List (Part A of the Documents List).

PART C - EIP DOCUMENTS

http://www.planning-inspectorate.gov.uk/pins/rss/north_west_gypsy_and_traveller/eip_documents.html		
Ref.	Title	Date
EiP1	File of representations to Submitted Draft RSS Partial Review document	July to Oct 2009
EiP2	Summaries of representations on draft Gypsy & Traveller Accommodation policy	Dec 2009
EiP3	Summaries of representations on draft Travelling Showpeople Accommodation policy	Dec 2009
EiP4	Summaries of representations on draft Regional Parking Standards policy	Dec 2009
EiP5	Draft List of Matters & Participants	Nov 2009
EiP6	Draft EiP timetable	Nov 2009
EiP7	Guidance Notes for Participants	Nov 2009
EiP8	Agenda for Pre-Examination Meeting on 30 November	Nov 2009
EiP9	Note of Pre-Examination Meeting on 30 November	Dec 2009

EiP9A	Panel note to 4NW on its understanding of intended 2016-21 distribution for additional permanent residential Gypsy & Traveller pitches	Nov 2009
EiP10	Agenda for Data Meeting on 19 January 2010	Dec 2009
EiP11A	Note of the Data Meeting. Morning Session – Gypsy & Traveller and Travelling Showpeople Accommodation	Jan 2010
EiP11B	Note of the Data Meeting. Afternoon Session – Parking Standards	Jan 2010
EiP12	Final List of Matters & Participants	Jan 2010
EiP13	Final EiP Timetable	Jan 2010
EiP14	Panel Note 1. Note to assist debate on Matter 1, question 1.2. Suggested Amendments to Car Parking Standards within Participants' Statements and Representations.	26/02/10
EiP15	Panel Note 2. Note to assist debate on Matter 1, question 1.6. Wigan's suggested amendment on parking standards for disabled people.	02/03/10

APPENDIX G LIST OF ABBREVIATIONS

AAC	Area Accessibility Category
AQ	Accessibility Questionnaire
AGMA	Association of Greater Manchester Authorities
BC	Borough Council
CABE	Commission for Architecture and the Built Environment
CC	County Council
DC	District Council
CIC	Community Interest Company
CLG	Department for Communities and Local Government
CPRE	Campaign to Protect Rural England
CPO	Compulsory Purchase Order
CPT	Confederation of Passenger Transport
DfT	Department for Transport
DPD	Development Plan Document
DPTAC	Disabled Persons Transport Advisory Committee
DVD	Digital Versatile Disc
EiP	Examination in Public
FFT	Friends, Families & Travellers and Travellers Law Reform Project
GTAA	Gypsy and Traveller Accommodation Assessment
Guild	Showmen's Guild of Great Britain
GONW	Government Office for the North West
HBF	Home Builders Federation
HCA	Homes and Communities Agency
HEI	Higher Education Institute
HGV	Heavy Goods Vehicle
ICCM	Irish Community Care Merseyside
ITMB	Irish Traveller Movement in Britain
LDD	Local Development Document
LDF	Local Development Framework
LPA	Local Planning Authority
LTA	Local Transport Authority
LTP	Local Transport Plan
NWDA	Northwest Regional Development Agency
NWRA	North West Regional Assembly ²²⁰
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PTA	Passenger Transport Authority
R	Recommendation (numbered by chapter) made in this Panel report
RPB	Regional Planning Body
RSL	Registered Social Landlord
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
Sqm	Square metre

²²⁰ NWRA was abolished in July 2008 and replaced by 4NW the Regional Leaders' Board for the North West