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Your Ref:
Our Ref: PINS/F2360/429/2
Date: 6 February 2014

Dear Ms Hockenhull

South Ribble Site Allocations and Development Management Policies DPD Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) January 2013

Thank you for your letter dated 27 January 2014 setting out revised timescales for taking forward the above Plan. I wish to work with you to ensure that the outstanding matters are resolved as quickly as possible in order that the Council may adopt the Plan. I have now had the opportunity to study the GTAA and I set out below some areas of concern that arise from that study and matters which I would ask the Council to consider further.

1. Cross boundary issues and the duty to co-operate

The GTAA is recommending the provision of sites on the basis of 'need where it arises'. This has the effect of reinforcing the uneven distribution of the existing population and ultimately constrains choices for gypsies and travellers in accessing suitable sites. Stakeholder Consultation has been undertaken as part of the GTAA and I note that some local authorities, outside Central Lancashire, are raising concerns on this basis. Can the Council demonstrate that it has had regard to the duty to co-operate with other local authorities (other than Chorley and Preston) on this strategic issue? Are there processes and procedures in place to ensure ongoing, meaningful consultation and discussion with nearby authorities on this matter?

2. Level of need identified in the study

I have serious concerns that the GTAA may underestimate the level of need. These concerns are set out in the annex at the end of this letter. It seems apparent that further detailed work is needed on this matter before it can be resolved. However, I am acutely aware of the further delay that this would cause to the adoption of the Plan and I wish to help the Council to avoid this if at all possible. Accordingly, I would ask the Council to consider putting forward main modifications to the Plan (in place of paragraph 7.9) in order to ensure soundness. These should incorporate the following points:

- A commitment to undertake further work on the GTAA within 12 months with the view to resolving the outstanding concerns highlighted in the annex to this letter.
- A commitment to producing a separate gypsy and traveller accommodation Plan, to include the provision of transit and travelling showpeople's sites, within a prescribed timescale.
- A recognition that the gypsy and traveller population can be hard to reach in undertaking GTAAs and an acknowledgement by the Council that there may be a hidden need from overcrowding, concealed households or those living in bricks and mortar which the current GTAA has been unable to identify.
- That future planning applications will be assessed on the basis of the CS policy and *Planning policy for traveller sites*, or any subsequent national policy.
- That the Council recognise the need to ensure fair and equal treatment for the gypsy and traveller community and the need to facilitate the traditional and nomadic way of life of travellers while respecting the interests of the settled community.
- The Council should also ensure that the need for further work on the GTAA and the production of a separate gypsy and traveller accommodation Plan, is set out in the LDS. The main modification should also refer to this.

I would see this as being a pragmatic way in which to take this matter forward. Its aim would be to ensure that the Council, and nearby authorities, properly address the needs of the gypsy and traveller community, whilst avoiding further delay to the adoption of the current Plan.

I would welcome the Council's response to these matters, and the wording of a suggested main modification to the Plan, at the latest by 24th February 2014.

Yours sincerely

Susan Heywood

Senior Housing and Planning Inspector

**Annex to Inspector's letter dated 6 February 2014
Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA)
January 2013**

Inspector's Matters and Issues to be Resolved

Reference is included to Preston and Chorley where this highlights concerns with the GTAA. These matters should be the subject of cross boundary discussions.

Cross boundary issues:

1. The GTAA is recommending the provision of sites on the basis of 'need where it arises'. This has the effect of reinforcing the uneven distribution of the existing population and ultimately constrains choices for gypsies and travellers in accessing suitable sites. How is cross boundary need to be addressed and met?

Does the GTAA represent a true picture of the gypsy and traveller population?

2. The survey reached all of the existing gypsy and traveller households living on pitches in the area and in this respect was successful. However, it initially identified 39 households who identified themselves as gypsies and travellers in the 2011 Census. Only 26 households were interviewed (23 on sites and 3 in bricks & mortar). Therefore there are 13 households 'missing' from the survey. But the survey includes no weighting to account for any need arising from that part of the population which was not reached (para 6.9).
3. There are no existing gypsy and traveller sites in South Ribble, but there is evidence referred to in the GTAA that there are existing gypsy and traveller households living in bricks & mortar in South Ribble¹. It would appear that no attempt has been made to identify and reach these households.

No provision is made for Travelling Showpeople (TS)

4. The GTAA says that no response was received from the TS contacts that the survey team were given (para 1.14). But, in reporting the responses of Stakeholders, it says (at para 9.15) "The Showman's Guild has requested provision of a separate yard for Showpeople". This information is conflicting and it does not justify the conclusion not to provide any sites. I also understand that TS families made representations on the Chorley Site Allocations Plan. This level of need appears to have been ignored in the GTAA.
5. The GTAA refers to the need identified in the RSS Partial Review that each Council in Central Lancashire should provide 10 plots for TS. It goes on to say that that information is now significantly out of date and, as surrounding authorities are progressing their own GTAAs, their TS needs will be covered in their respective studies and "any cross boundary need will be satisfied through the arrangements set up under the duty to co-operate" (para 4.8). How is this cross boundary need to be addressed?

¹ Para 9.9; stakeholder response at D.18

Transit site provision

6. The GTAA only takes account of the need for transit sites up to 2018. This does not cover the Plan period.

Has the identified level of need taken account of all factors?

7. Unauthorised encampments - There have been unauthorised encampments in both South Ribble and Chorley since 2010. In South Ribble during 2013, these occurred in Jan (3 incidents), Feb, May, June, July (2 incidents) and August (2 incidents). In Chorley during 2013, these occurred in Feb, March, June & July. In South Ribble, monitoring of the duration of these occurrences appears not to take place so that in many instances there is no record of how long the encampment was in place. The GTAA uses these figures to indicate that there is a transit need, but without the detail on the length of duration of the stop, and indeed who those travellers were, this could be masking a more permanent need (see DCLG guide² at para 6.2). See also point 15 below relating to the duration of the survey.
8. Unauthorised developments - Information was taken from the Bi-annual Caravan Count³ (table 5.1). This shows that at each count from July 2011 there were 5 or 6 caravans on unauthorised pitches in Chorley. The last count used was Jan 2013. These do not appear to have been taken into account in the table which summarises need and supply (table 6.1). I would have expected these to appear in the 'unauthorised' section of the 'current pitches'. I have assumed these to be different to the 2 authorised temporary pitches in Chorley (which are identified in the table). But further explanation may demonstrate that these are the same (ie. it may be that these pitches were unauthorised and have subsequently been granted temporary planning permission and so are appearing in the authorised section of the table. This is not clear from the report).
9. I note that for Preston there is a constant figure of 7 unauthorised pitches in July 2001, Jan 2012 and Jan 2013. This would suggest that it may be the same 7 pitches, but again this does not appear in the need and supply table.
10. Annual population increase – the DCLG guide says that information on the likely rate of household formation and assessments of future need should be based primarily on locally gathered evidence. In the event that this does not provide a clear picture a national average of 3-4% growth rate can be used. It also says that it may be unrealistic to try to forecast need for up to 15 years but that projections should be made for years 5-10.
11. The study takes a 14 year time frame to 2026/27 (from 2013). Analysis of the local position indicates that only one new household is expected to form between 2013/14 and 2017/18. This would appear to be low and I would question the evidence for this figure.
12. This figure increases between 2018/19 and 2027/28⁴ to 26 new households. However, the GTAA assumes that half of these households will move away so,

² Gypsy and Traveller Accommodation Needs Assessments Guidance 2007

³ It is generally acknowledged that these only provide a snapshot on one or two days of the year. But it can be an indicator of need.

⁴ The figure is adjusted to the Plan period ending 26/27

in the longer term, it assumes 13 new households requiring pitches. I would query the evidence on which this assumption is based as there is currently no turnover on existing sites, meaning that the current population is very settled. The one new household that is currently known about also intends to stay in this area. What is the evidence to support the assumption that these new households will have anywhere else to go when they form? The study appears to be assuming that other local authorities will be providing for that need ie. it is factoring in out-migration in the future, with no corresponding in-migration.

13. Waiting lists – no mention is made that any analysis has been carried out of the waiting list for the local authority site in Preston. This can be a further indicator of need (DCLG guide para 62).
14. Overcrowding – the report mentions (para 5.20) that a limited number of respondents in Preston felt that their home was overcrowded. This can be an indicator of concealed households. This does not appear to have been assessed or factored into the need.

Duration of the survey:

15. The survey was carried out for 5 weeks from early September 2013. DCLG guidance suggests that this should be done for 6-9 months in order to take account of seasonal variations. See also the comments regarding unauthorised encampments at point 7. Could a longer survey period have attempted to reach those gypsies and travellers on unauthorised encampments?

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