

# West Midlands Regional Spatial Strategy Phase Three Revision

## Interim Policy Statement

## Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

Background Paper - March 2010



West Midlands  
Regional Assembly

This Background Paper was prepared on behalf of the West Midlands Regional Assembly (WMRA) as part of the West Midlands Regional Spatial Strategy (WMRSS) Revision process. It is one of a suite of papers to inform the development of Interim Policy Statements and Policy Recommendations as part of the WMRSS Revision process.

The WMRA adopted “decentralised” working arrangements where much of the technical and policy development work was undertaken by RSS Policy Leads, predominantly drawn from local authorities across the Region. This enabled the WMRA to draw on the expertise held throughout the Region.

The Lead for Gypsies, Travellers and Travelling Showpeople is Emma Kiteley (West Midlands Leaders Board).

This Background Paper has not been formally endorsed by, and therefore does not necessarily reflect the views of, the West Midlands Regional Assembly.

Further information and details of the West Midlands Regional Spatial Strategy and the Revision process can be found on the WMRA website at:  
[http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/Planning\\_and\\_Regional\\_Spatial\\_Strategy.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Planning_and_Regional_Spatial_Strategy.aspx)

Every effort has been made to verify and check the contents of this report including all figures and tables. However the West Midlands Regional Assembly cannot accept any responsibility for errors or inaccuracies.

## **Introduction**

The Regional Planning Guidance (which subsequently became the WMRSS) was approved and published in June 2004 by the Secretary of State. Since 2004 the WMRSS has been part of the statutory development plan for each local authority in the West Midlands Region.

The WMRSS covers a wide range of topics, including housing, employment, transport and the environment. You can find a copy of the WMRSS on the WMRA website at

[http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/Regional\\_Spatial\\_Strategy/Regional\\_Spatial\\_Strategy\\_\(RSS\).aspx#Jan2008](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/Regional_Spatial_Strategy/Regional_Spatial_Strategy_(RSS).aspx#Jan2008)

The purpose of the WMRSS is to guide the preparation of local authority development plans and local transport plans, so together they can provide a coherent framework for the development of the Region. The WMRSS also provides a planning framework for other regional, sub-regional and local strategies, programmes and plans such as the West Midlands Economic Strategy and Regional Housing Strategy.

Following publication of the WMRSS in 2004 the WMRA, in its role as Regional Planning Body (RPB), was tasked by the Secretary of State to further develop selective elements of the RSS. This revision process was undertaken in the following three phases:

- **Phase One** was completed in January 2008 and sets out a long-term strategy for the Black Country area.
- **Phase Two** focused on housing development, employment land, town centres, transport and waste together with overarching policies relating to climate change and sustainable development. This Phase was subject to an Examination in Public (EiP) in Spring 2009. The Panel Report was published in September 2009, but in March 2010 the Government advised WMRA that the Secretary of State's Proposed Changes would not be published before July 2010. Further details can be found on the Government Office for the West Midlands (GOWM) website at:  
<http://www.gos.gov.uk/gowm/Planning/515750/863204/>
- **Phase Three** looked at rural services, gypsies, travellers and travelling showpeople, culture, sport and tourism, environment and minerals.

The Local Democracy, Economic Development and Construction Act 2009 will, amongst other things, bring together Regional Spatial Strategies and Regional Economic Strategies into a single Regional Strategy for each of the English regions. From 1st April 2010, the Regional Strategy will consist of the West Midlands Regional Spatial Strategy (January 2008 version which incorporates WMRSS Phase One) and the existing Regional Economic Strategy (RES).

Any WMRSS Phase Three legacy work will be incorporated into developing the new Regional Strategy.

In the light of these legislative changes, WMRA, GOWM and Advantage West Midlands (AWM) agreed in September 2009 that the issues covered in Phase Three should be progressed through the new Regional Strategy process rather than through the RSS Phase Three Revision. It was agreed that the Phase Three issues be taken forward in one of two ways:

- 1) **Interim Policy Statements** which will provide a framework for relevant policies in the preparation of Local Development Frameworks. Two Policy Statements have been developed which cover the provision of pitches for gypsies & travellers and plots for travelling showpeople and the sub-regional apportionment of construction Aggregates;
- 2) **Policy Recommendations** which will feed into the preparation of the new Regional Strategy. The majority of issues within the Phase Three Options document will be progressed in this manner.

The Policy Recommendations were approved by the WMRA in February 2010. The Interim Policy Statements were approved by the WMRA in March 2010. The Interim Policy Statements and Policy Recommendations were also noted by the Joint Strategy & Investment Board in March 2010 as a basis for future work by the two responsible regional authorities, the West Midlands Leaders Board and AWM.

**On 30th March 2010 GOWM confirmed that they now expect planning authorities to ensure that their Development Plan Documents are sufficiently flexible to enable them to deliver the requirements set out in the Interim Policy Statements.**

**GOWM have also confirmed that the Policy Recommendations should now be progressed as part of the new Regional Strategy.**

GOWM letters relating to the Interim Policy Statements and Policy Recommendations can be downloaded from the WMRA website at  
[http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/RSS\\_Revision/RSS\\_Revision\\_Phase\\_3.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/RSS_Revision/RSS_Revision_Phase_3.aspx)

This Background Paper has been prepared to help improve understanding of the issues contributing to the development of the Interim Policy Statement relating to the **Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople.**

## **RSS Revision Objectives**

The purpose of the RSS revision is to update and develop Policy CF9 (sites for Gypsies and Travellers) in the WMRSS and formulate new RSS policy on sites for Travelling Showpeople.

There are four key objectives of the Gypsies, Travellers and Travelling Showpeople element of the RSS Revision Phase 3 review, namely:

1. To increase significantly the number of Gypsy and Traveller pitches across the West Midlands, in order to address existing under-provision as expressed in the sub-regional Gypsy and Traveller Accommodation Assessments.
2. To ensure there are sufficient plots in the Region to meet the accommodation needs of Travelling Showpeople.
3. To ensure that all revised Gypsy and Traveller and Travelling Showpeople policies in the RSS, Local Development Frameworks (LDFs) and other Regional and sub-regional strategies recognise, protect and ensure a traditional travelling way of life for Gypsies, Travellers and Travelling Showpeople, whilst also respecting the interests of settled communities.
4. To ensure that all Development Plan Documents (DPDs) include fair, realistic and inclusive policies in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople, and that the potential for Gypsies, Travellers and Travelling Showpeople to be evicted and thereby become homeless is avoided.

## **Technical studies and other empirical evidence**

1. To assist in this Communities for the Future element, a Gypsy and Traveller Reference Group was established to offer advice to the Regional Assembly. The membership is shown in Appendix 1. The Centre for Urban and Regional Studies (University of Birmingham) and the Salford Housing & Urban Studies Unit (University of Salford) were commissioned to provide technical advice and assistance on this part of the RSS Revision.
2. This report outlines the technical work undertaken in order to establish an estimate of the pitch/plot requirements for Gypsy, Traveller and Travelling Showpeople communities. For clarity it is in two main sections:
  - Estimating numerical regional pitch/plot requirements
  - Generating Options for the allocation of pitch/plot requirements at local authority level.
3. The geographical diversity of the West Midlands Region is significant in this regard. In particular, it is important to note the extreme contrast between the highly urbanised conurbation authorities and those of the largely rural west of the Region. Except in parts of the rural west, nowhere in the Region is far distant from good communication routes.

### **Estimating Regional Pitch/Plot Requirements**

4. In accordance with Government requirements, in March 2007 the Regional Assembly submitted to Communities and Local Government an *Interim Regional Statement on Gypsy & Traveller Policy* followed in November 2007 by a *Travelling Showpeople Supplement*. Both addressed the estimated requirement for additional pitch/plot provision on the basis of secondary information, with the intention that both documents would be superseded by the RSS Revision once the findings of the local authorities' Gypsy and Traveller Accommodation Assessments (GTAAAs) became available.
5. The 6 sub-regional Gypsy and Traveller Accommodation Assessments (GTAAAs), commissioned by the local authorities of the West Midlands, were completed between 2007 and 2008. They form the basis of the technical work contributing to the Phase 3 Revision. Table 1 overleaf shows the local authorities covered by each, and also shows who carried out the study.

### ***Overview of Gypsy and Traveller Accommodation Assessments***

6. The team from the Universities of Birmingham and Salford examined the GTAAAs and produced an *Overview report*<sup>1</sup>. This report assessed the study methods used, their implications for robustness and the reliability of findings of the GTAAAs, and set out the resulting pattern of requirements for residential and transit pitches for Gypsies and Travellers and plots for Travelling Showpeople. 'Requirements' are defined as the number of additional pitches or plots to be provided in order to meet assessed 'need' for pitches/plots net of any estimated 'supply' arising during the relevant planning period.
7. As a result of this desk-based benchmarking exercise, the Overview concluded that the survey methods and ways in which pitch requirements were calculated are

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<sup>1</sup> *Overview of Gypsy and Traveller Accommodation Assessments* (May 2008)

sufficiently consistent and robust for the GTAA findings to be relied upon to give a regional picture of requirements. While the GTAAs differ in detail in the way pitch requirements have been estimated – reflecting non-prescriptive guidance from CLG – there appear to be no significant methodological gaps or errors which should (or realistically could) be remedied prior to consideration of the estimates in the RSS Revision.

8. Appendix Table A1 of the Overview report presented requirement figures from the GTAA at local authority level for:

- Residential pitches for Gypsies and Travellers Years 1-5
- Residential pitches for Gypsies and Travellers Years 6-10
- Transient pitches
- Plots for Travelling Showpeople

9. The table reveals gaps in estimates from the GTAAs:

- The South HMA GTAA does not provide figures for residential pitches Years 6-10
- The West and Birmingham/Coventry/Solihull GTAAs do not quantify transient requirements
- The Birmingham/Coventry/Solihull GTAA notes the need to re-locate a large yard for Showpeople but does not express this in terms of plots.

**Table 1: Summary of West Midlands GTAAAs**

<b>GTAA</b>	<b>Local authorities covered</b>	<b>Lead consultant</b>
North HMA	East Staffordshire, Newcastle-under-Lyme, Stafford, Staffordshire Moorlands, Stoke-on-Trent	SHUSU (University of Salford)
Southern Staffordshire/Northern Warwickshire (A5 Corridor)	Cannock Chase, Lichfield, South Staffordshire, Tamworth, North Warwickshire, Nuneaton & Bedworth, Rugby	SHUSU (University of Salford)
West	Bridgnorth, North Shropshire, Oswestry, Shrewsbury & Atcham, South Shropshire, Herefordshire, Telford & Wrekin (and Powys)	CURS (University of Birmingham)
South HMA	Bromsgrove, Malvern Hills, Redditch, Worcester, Wyre Forest, Wychavon, Wyre Forest, Stratford-on-Avon, Warwick	In-house survey; report by Rupert Scott
Black Country	Dudley, Sandwell, Walsall, Wolverhampton	Fordham Research
Birmingham/Coventry/Solihull	Birmingham, Coventry, Solihull	CURS (University of Birmingham)

10. Appendix Table A2 of the *Overview* report made estimates to fill these gaps as follows:

- South HMA residential pitch requirements Years 6-10 were estimated by applying a 3%pa growth rate to reported current authorised pitches plus Year 1-5 residential requirements taken from the GTAA. A similar method had been applied in each GTAA other than the Black Country where a 3.9%pa growth rate had been used (based on survey findings).
- Transient pitch requirements in West and Birmingham/Coventry/Solihull were estimated on the assumptions that: numbers broadly reflect the levels of unauthorised encampment reported in the GTAAs; each local authority has an allocation of at least 5 pitches and all estimates are rounded to the nearest 5 pitches (reflecting the practicalities of sustainable site provision).
- The Birmingham/Coventry/Solihull requirement for plots for Travelling Showpeople was estimated on the basis of known current residents on the site together with an allowance for some family increase (a net increase of 5 plots).

All other figures in Appendix Table A2 were taken directly from the GTAAAs.

11. Table 2 summarises the pitch requirements across the Region established in the *Overview* report through the GTAAAs supplemented as described above. Appendix Table A2 of the *Overview* report is sufficiently influential in the process of making regional estimates to warrant inclusion as Appendix 2 of this note.

**Table 2: Summary of Regional Pitch/Plot Requirements Established in the Overview Report**

Residential pitches for Gypsies and Travellers Years 1-5	669 pitches
Residential pitches for Gypsies and Travellers Years 6-10	276 pitches
Transient pitches for Gypsies and Travellers Years 1-5	243 pitches
Plots/yards for Travelling Showpeople Years 1-5	118 plots

#### **Section 4(4) Advice from Strategic Authorities**

12. Advice was sought from the Strategic Planning Authorities on the various issues covered by Phase 3 of the RSS Revision including Gypsies, Travellers and Travelling Showpeople. The *Overview* report was circulated to authorities during the Advice period for information.

13. The Centre for Urban and Regional Studies was asked to bring together and assess Advice submitted on Gypsy, Traveller and Travelling Showpeople issues. A report<sup>2</sup> was produced in August 2008 summarising the Advice and identifying outstanding issues to be resolved.

14. In terms of pitch/plot requirement estimates, there were two main conclusions:

- The Advice broadly supported the figures for pitch requirements estimated by the six sub-regional GTAAAs.
- Authorities did not feel able to go beyond the GTAAAs in making estimates where the GTAA had not provided figures for some periods and/or types of site; authorities neither supported nor rejected the figures suggested to fill some of these gaps in Appendix Table A2 of the *Overview* report (see paragraph 11 above for the basis of these suggestions).

<sup>2</sup> Note On Section 4(4) Advice, Housing: Gypsies, Travellers And Travelling Showpeople (August 2008)

One issue emerging from the Advice was how to treat the variable time periods covered by the GTAAAs; the Advice had asked for figures relating to 2006 to 2011 and 2011-2016 but most GTAAAs are based on 2007 apart from South HMA and Black Country which have a 2008 start date.

15. Having considered the Advice, it was decided that:

- In the absence of Advice to the contrary, the amended pitch requirement figures from the GTAAAs as presented in Appendix Table A2 of the Overview report should be re-examined and developed as the base ‘need where it arises’ estimate.
- Figures should be re-based to 2007 and should run where possible to 2017.

16. The note produced by Pat Niner (Centre for Urban and Regional Studies) on 30 September 2008 setting out the **permanent pitch requirement** estimates for Gypsies and Travellers and the derivation of the figures is reproduced in Appendix 3. The explanatory notes explain why figures differ slightly from those set out in Appendix Table A2 of the Overview report (Appendix 2 of this note).

The regional estimates are:

2007-2012	660 pitches
<u>2012-2017</u>	<u>279 pitches</u>
2007-2012	939 pitches

When developing the Options it was decided to treat the 10 year period as a whole rather than splitting it into 5 year periods. This practice was followed in the South East of England Single Issue RSS Review process and is a recognition of the practicalities of the Revision timetable and possible implementation period. The figure of 939 permanent pitches for Gypsies and Travellers forms Option 1 ‘need where it arises’.

17. In finalising the ‘need where it arises’ requirement for **transient pitches**, the GTAA-amended figures presented in Appendix Table A2 of the Overview report (Appendix 2 of this note) were accepted with two amendments:

- Appendix Table A2 of the Overview report did not break down the figure of 10-12 pitches across the Black Country to local authority level. It has been assumed that each of the four authorities had a requirement of 3 transient pitches (12 in all). This has the effect of raising the regional total by 1 pitch since the mid-point of the range (11 pitches) had been used initially in calculating the regional total.
- It has been assumed that the requirements arise over the full 10 year period 2007-2017. The GTAAAs are not always explicit about time periods in relation to transient pitches.

This results in a regional total requirement of 244 transient pitches distributed as set out in Appendix 2 of this note, but with 3 pitches each for Dudley, Sandwell, Walsall and Wolverhampton.

18. Similarly, the figures and distribution from Appendix Table A2 of the Overview report (Appendix 2 of this report) for **plot requirements for Travelling Showpeople** have been accepted for the period 2007-2012. This is a regional total of 118 plots.

## **Options and Evidence Base**

### **Developing the Pitch Allocation Options for Permanent Pitches for Gypsies and Travellers**

19. Background guidance for Regional Planning Bodies around developing pitch requirement Options is found in:

- ODPM Circular 01/2006 *Planning for Gypsy and Traveller Caravan Sites*
- ODPM Planning Policy Statement 11 *Regional Spatial Strategies* (2004) which includes the presumption that Options should be developed, consulted upon and appraised in RSS reviews
- CLG *Preparing Regional Spatial reviews on Gypsies and Travellers by regional planning bodies* (2007) which, in Chapter 4 discusses how an RPB might go about taking a strategic view of needs across the region

20. The approach taken in other regions which are more advanced in making a regional estimate of requirements and developing pitch allocation Options in Single Issue RSS Reviews was examined. This examination suggested that:

- The South West Regional Assembly had consulted on a single pitch distribution of requirements for residential and transit pitches for Gypsies and Travellers. This was broadly on a basis of 'need where it arises' as evidenced by the sub-regional GTAAAs and local authority advice. The indications are that the West Midlands would not be permitted to consider one Option only.
- In the East of England a redistributive Option was developed to maximise choice for Gypsies and Travellers and increase deliverability. A minimum of 15 residential pitches for Gypsies and Travellers was allocated to every local authority, top-sliced from the assessed requirements of the authorities with the highest pitch requirements (transit needs and plots for Travelling Showpeople were not considered at this stage). This formed the basis of Option 2 in the consultation; Option 1 was on a 'need where it arises' basis. Following public consultation, the redistributive Option 2 was agreed as the Preferred Option. (Subsequently the report of the Panel of the Examination in Public has accepted in principle this redistributive approach, as has the Secretary of State's Proposed Changes to the Draft Revision of the RSS.)
- The South East of England Regional Assembly was also developing more redistributive Options through Section 4(4) Advice which asked local authorities, within a GTAA or county-wide grouping, to suggest a distribution of residential pitch requirements for Gypsies and Travellers which takes account of planning opportunities and constraints. Most authorities responded and provided an Option B along these lines in addition to Option A (need where it arises). The Regional Assembly itself developed further Options again based around planning opportunities and constraints permitting redistribution across the region; four Options were consulted on. (Subsequently, following sustainability appraisal and consultation, a variant of the wider redistributive approach has been agreed as the Preferred Option.)

21. On the basis of this experience from other Regions, it was decided that Options for the allocation of permanent pitches for Gypsies and Travellers in the West Midlands should be developed:

- Option 1 : 'need where it arises'
- Option 2 : distribution taking account of planning constraints and opportunities
- Option 3 : redistribution to spread provision more evenly by setting a minimum pitch allocation

22. As part of the brief for Advice from the Section 4(4) strategic planning authorities, respondents were asked to provide pitch requirement figures according to each of these Options. Numerical estimates were only received for Option 1. Reasons given for not providing figures for Options 2 and 3 included lack of information and the belief among some Section 4(4) authorities that provision should be made in line with 'need where it arises' as evidenced by the GTAAAs. The Metropolitan authorities, Shropshire and Herefordshire all argued that, in principle, the accommodation needs of Gypsies and Travellers should be met in the authority in which they arise. It proved hard to gauge from comments whether there was any support for the principle of using planning considerations to generate an Option at regional level (Option 2). There was one indication of support (Staffordshire) for an Option based on a more equitable distribution (Option 3).

23. In the absence of conclusive Advice on generating Options for allocating pitch requirements, the Regional Assembly undertook its own work. How the Option 1 distribution to local authorities was determined has been described above. The following sections describe the technical approach in developing Options 2 and 3.

### ***Developing Option 2 (planning constraints and opportunities)***

24. As with other forms of development, finding suitable land for provision of Gypsy and Traveller sites is an important consideration. ODPM Circular 01/2006 discusses issues relating to different forms of planning considerations as they might affect site provision in rural areas and as part of major developments. Option 2 is designed to take account of the extent of suitable land in a district in allocating pitch requirements. Very broadly, districts with larger amounts of 'suitable' land might expect to receive a higher pitch allocation than a district with very little 'suitable' land. 'Suitability' can be defined as encompassing both freedom from constraints and having opportunities to access services.

25. The Regional Assembly commissioned Land Use Consultants to map planning constraints and opportunities to help in the development of Option 2. Their final report was submitted in December 2008<sup>3</sup>. A list of the maps produced is included in Appendix 4. These maps are available for inspection from the Regional Assembly.

26. The **constraints** mapped were:

- Green Belt
- Built-up areas
- Flood risk zones 2 & 3
- Areas of Outstanding Beauty (AONB)
- Sites of Special Scientific Interest (SSSIs)
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- RAMSAR sites
- Grade 1 agricultural land
- National Nature Reserves
- Ancient Woodland
- Peak District National Park

A composite map was built up to identify land covered by one or more of these constraints. Remaining land areas were identified as unconstrained.

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<sup>3</sup> Land Use Consultants, *Gypsy and Traveller Site Provision: Planning Constraints and Opportunities GIS Mapping December 2008*

27. Because of regeneration opportunities and re-use of brown-field land, built-up areas cannot be seen as an absolute constraint. For the development of Option 2 10% of the built-up area is considered to be potentially available in each district and this amount of land is added to unconstrained land.

28. Circular 01/2006 makes clear that Green Belts should not be seen as an absolute constraint since boundary adjustments are possible, and Gypsy and Traveller sites might be seen as 'exceptions' to Green Belt constraints in appropriate circumstances. In the light of known concerns about potential use of the Green Belt, Land Use Consultants ran alternative calculations treating Green Belt as a 100% and as a 95% constraint. Altering the assumption on treatment of Green Belt made very little difference in practice. If pitch requirements were to be allocated between local authorities solely on the basis of their share of the Region's unconstrained land, only two local authorities experience more than a 2 pitch difference under the different Green Belt assumptions. Treating 95% rather than 100% of Green Belt land as a constraint has the effect of reducing requirements by 4 pitches in Herefordshire and by 3 pitches in Shropshire. No authority gains more than 2 pitches. In the light of this analysis, and bearing in mind the guidance in Circular 01/2006, it was decided to assume that 5% of Green Belt land is considered to be potentially available in each affected district and this amount of land is added to unconstrained land.

29. Given the geography of the West Midlands, over half (54%) of unconstrained land is in the more rural western sub-region of Shropshire, Herefordshire and Telford & Wrekin. A distribution of pitch requirements based solely on planning constraints would not make sense in community terms and would be unsustainable. While this distribution appears in column 9 of Table 4 of Land Use Consultants final report, it has not been considered or taken further as a serious, realistic Option.

30. Planning **Opportunities** were defined as:

- Population at 2017
- 60 minutes public transport isochrone to hospitals
- 30 minutes public transport isochrone to primary schools
- 40 minutes public transport isochrone to Regional Employment Land Sites
- 40 minutes public transport isochrone to secondary schools
- Motorways, primary and A roads

These were mapped (see Appendix 4).

note - an isochrone is a line on a chart or map connecting points that have the same value at the same time

31. To help develop Option 2, the area of land in each district within the public transport isochrones for key services was identified. Not surprisingly, the pattern of opportunities is very different from that of constraints. Almost two-fifths (39%) of 'opportunity' land is in the West Midlands conurbation. Again, a distribution of pitch requirements based solely on opportunities would not make sense or be sustainable given where Gypsies and Travellers currently live and their family connections. This has not been considered further.

32. To develop a more realistic Option taking account of planning constraints and opportunities, the decision was taken to distribute only a proportion of regional pitch requirements on this basis with the remainder being allocated according to 'need where it arises' as in Option 1. This is in recognition of the importance of Gypsy and Traveller established community links reflected in current population patterns. Alternative scenarios were generated by varying the proportion of requirements to be allocated according to

constraints and opportunities, and the ways in which constraints and opportunities are combined:

- A. 75% of requirements allocated as in Option 1, 25% allocated on the basis of the authorities' proportion of the region's unconstrained land area.
- B. 75% of requirements allocated as in Option 1, 25% allocated on the basis of the authorities' proportion of the region's footprint of opportunities on unconstrained land.
- C. 75% of requirements allocated as in Option 1, 25% allocated on the basis of the authorities' proportion of the region's opportunity land area.
- D. 60% of requirements allocated as in Option 1, 20% allocated on the basis of the authorities' proportion of the region's footprint of opportunities on unconstrained land, and 20% allocated on the basis of the authorities' proportion of the region's opportunity land area.
- E. 50% of requirements allocated as in Option 1, 50% allocated on the basis of the authorities' proportion of the region's footprint of opportunities on unconstrained land.

33. The methodology used to calculate pitch requirements under each scenario was similar, varying only the source data taken from the Land Use Consultants report and the proportion of requirements allocated on the basis of constraints/opportunities and Option 1 (need where it arises). The steps in the methodology relating to Scenario B (subsequently taken forward as the preferred formulation of Option 2) are detailed in the box below.

#### **Method of Calculating Option 2 Scenario**

There are three steps in the methodology:

- First, each district is given 75% of its Option 1 'need where it arises' requirement. South Staffordshire, for example, with an Option 1 requirement of 50 is given 37.5 pitches.
- The second step is to calculate the number of pitches each district will receive on the basis of planning constraints and opportunities. For each authority, the area (in hectares) in the footprint of opportunities on unconstrained land is listed. The total footprint across the Region is 19,515 hectares. At district level the range is from 16 hectares in Wolverhampton to 4,313 hectares in Shropshire. Each authority's share of the regional total is calculated. This percentage is then applied to the figure for 25% of regional pitch requirements (235) to give the number of pitches each authority will receive reflecting opportunities and constraints. For example, South Staffordshire has an opportunity footprint on unconstrained land of 509 hectares which represents 2.6% of the regional total. 2.6% of 235 pitch requirement is 6.1 pitches.
- The final step is to add together the 'need where it arises' and the opportunities/constraints elements to give the Option 2 requirement. In the example of South Staffordshire, this is 37.5 plus 6.1 = 43 (rounded to the nearest whole number).

34. Appendix 5 brings together these scenarios and their outcomes in terms of permanent pitch requirement allocations to individual local authorities. Table 3 summarises the effect of each of the Option 2 scenarios tested at 'county' level (combining Shropshire, Herefordshire and Telford & Wrekin, combining Stoke on Trent with Staffordshire, and grouping the metropolitan boroughs together). The figures in the table are the difference between the particular Option 2 scenario and Option 1.

**Table 3: Effect of Option 2 Scenarios at 'County' Level: Differences from the Option 1 Distribution**

Area	Option 2 Scenarios				
	A	B	C	D	E
Shropshire/Herefordshire/Telford & Wrekin	+68	+41	-27	+33	+81
Staffordshire/Stoke on Trent	-14	+1	-5	-15	0
Warwickshire	-12	-15	-18	-24	-30
Worcestershire	-8	-2	-16	-20	-2
Conurbation	-34	-25	+67	+27	-49

35. Of these alternative scenarios, B (75% Option 1; 25% on opportunity footprint on unconstrained land) has been identified as the preferred formulation of Option 2 to take forward for consultation. The reasons are:

- It satisfies the logic of including both planning constraints and opportunities.
- It is the least redistributive of the scenarios tested. The other scenarios redistribute requirements to an extent likely to be unsustainable in the way they ignore current Gypsy and Traveller settlement and likely preferences and/or to be undeliverable. The redistributive effect is heightened by the contrasting nature of the major gainers and losers (the rural west and the conurbation) under the different scenarios. This is the direct consequence of West Midlands geography.

36. Table 4 overleaf sets out the preferred formulation of Option 2 showing the allocation of pitches at district council level. Its advantages lie in recognising the importance of existing communities (through the 'need where it arises' element) and easing potential supply issues by focusing more on suitable land for site development. Its weaknesses are that some districts retain very small pitch allocations so that areas of choice for Gypsies and Travellers are not greatly increased over Option 1. There are also some questions over sustainability because of the general westward shift of requirements into the more rural parts of the Region and away from the employment opportunities represented by the large settled population of the conurbation. Gypsies and Travellers might prove unwilling to take up opportunities in line with Option 2.

**Table 4: Option 2: Pitch Requirements at District Level and Comparison with Option 1**

Local authority	Pitch requirements 2007-2017		Difference between Option 1 and Option 2
	Option 1	Option 2	
<b>Staffordshire</b>			
Cannock Chase	35	28	-7
East Staffordshire	15	23	+8
Lichfield	11	12	+1
Newcastle-under-Lyme	20	20	0
South Staffordshire	50	44	-6
Stafford	37	42	+5
Staffordshire Moorlands	2	7	+5
Tamworth	7	6	-1
<b>Warwickshire</b>			
North Warwickshire	18	16	-2
Nuneaton & Bedworth	29	27	-2
Rugby	66	55	-11
Stratford-on-Avon	45	43	-2
Warwick	13	15	+2
<b>Worcestershire</b>			
Bromsgrove	3	4	+1
Malvern Hills	33	34	+1
Redditch	0	4	+4
Worcester	22	19	-3
Wychavon	66	70	+4
Wyre Forest	44	35	-9
<b>Metropolitan districts</b>			
Birmingham	19	16	-3
Coventry	3	5	+2
Dudley	21	17	-4
Sandwell	3	3	0
Solihull	26	23	-3
Walsall	39	31	-8
Wolverhampton	36	27	-9
<b>Unitary authorities</b>			
Herefordshire	109	109	0
Shropshire	93	122	+29
Stoke-on-Trent	40	36	-4
Telford & Wrekin	34	46	+12
<b>West Midlands</b>	<b>939</b>	<b>939</b>	<b>0</b>

### ***Developing Option 3 (a more even distribution with a minimum pitch allocation)***

37. Groups representing Gypsies and Travellers at the Examination in Public in the South West argued that it should be possible for Gypsies and Travellers to live on authorised sites in all parts of the country. Because the current pattern of provision is uneven, pitch requirements estimated purely on a ‘need where it arises’ basis as in Option 1 tend to reinforce current inequalities and mean that there will still be local authority areas with no or very low provision even after 10 years. This is true in most regions of England, including the West Midlands. The underlying principle of Option 3 is that the allocation of requirements should seek to redress some of these inequalities, thus increasing choice for Gypsies and Travellers and increasing deliverability by spreading the range of potential areas for new site provision.

38. CURS was asked to develop potential scenarios for the allocation of permanent pitch requirements between local authorities according to the Option 3 principles. A note was produced in October 2008 setting out 7 possible scenarios which are reproduced in Appendix 6. Two of these scenarios were taken forward for discussion at the RSS Gypsy and Traveller Reference Group meeting in December 2008.

39. The scenarios relate to the 5 year period 2007-2012<sup>4</sup>, working on a base (need where it arises – Option 1) requirement figure of 660 pitches across the Region. At this stage the district councils of Shropshire were included as separate entities – they were amalgamated in later analyses in recognition of unitary status for the county from April 2009. The seven scenarios developed are described below, with a brief account of their rationale and implications.

- **Scenario A:** One of the arguments sometimes made is that distributions of requirements on a ‘need where it arises’ basis are ‘unfair’ because they ‘penalise’ the local authorities which have made provision and benefit those which have made no provision and therefore appear to have no additional need arising. Scenario A was introduced to show the effect of taking a logical ‘maximum fairness’ argument by allocating inversely to the level of current provision using the Caravan Count figures from January 2008 for caravans on authorised social and private sites as a proxy. Wychavon, the local authority with the highest level of current provision, is set at zero and other allocations are set in relation to this inversely so that the authorities with the lowest current provision receive the highest future allocation. The arithmetic of the calculation means that authorities with no authorised provision receive an allocation of 23 pitches. This has a major redistributive effect, both at local and sub-regional levels. It is likely to be judged unsustainable, since it totally ignores Gypsy and Traveller preferences. It would probably not be deliverable and would lead to continuing unauthorised encampments and developments in the areas where need arises and where little or no provision is planned. This scenario was rejected as unrealistic.
- **Scenario B:** This scenario tested another possible interpretation of ‘fairness’ by giving every authority a similar allocation. Each authority receives an equal allocation regardless of current provision or assessed need. Authorities with a base (need where it arises) requirement of up to 20 pitches receive an allocation of 19 pitches, others receive an allocation of 20. Although this scenario has the effect of increasing the potential choice of locations open to Gypsies and Travellers, it is unlikely to be

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<sup>4</sup> These were the first allocation scenarios to be developed. They covered the 5 years 2007-2012. At a later stage in the process of developing scenarios, it was decided that they should cover the 10 years 2007-2017 and some of these early scenarios were re-run for the full 10 year period (see paragraph 42).

sustainable or deliverable because it ignores Gypsy and Traveller preferences for living in areas of major settlement at present. Again it could lead to continuing unauthorised development of sites in ‘popular’ areas. This scenario was rejected as unrealistic.

- **Scenario C:** Each authority receives an allocation of at least 10 pitches. The pitches ‘diverted’ into these authorities are subtracted from the base (need where it arises) requirements of all other authorities in proportion to their base requirement so that those with the highest base requirements lose the most pitches in their allocation. The rationale for ensuring that every local authority makes a minimum provision is to increase choice for Gypsies and Travellers while also increasing deliverability by increasing the number of potential locations for provision. The 10 pitch minimum was set at a level which would allow economic site development and ensure Gypsy and Traveller families would not be isolated in ‘new’ areas. It also reflects West Midlands geography and pitch requirements. The scenario has two main merits: it ensures that there will be provision in all parts of the region; and it retains a distribution in which authorities with a relatively high requirement on a ‘need where it arises’ basis still have relatively high allocations thus facilitating retention of existing family links and communities. It implies, however, that some need might be ‘diverted’ over long distances. While not taken forward immediately, this scenario forms the basis for the currently preferred Option 3 allocation.
- **Scenario D:** This scenario was intended to counter the need for long-distance ‘diversion’ of need implied by Scenario C. It aims to redistribute pitches more locally. Authorities are brought up to a 10 pitch minimum only where ‘excess’ pitches can be diverted from an adjoining authority with a base requirement of more than 20 pitches. It is assumed that only a third of base requirements can be exported. West Midlands geography is such that not all authorities can reach a 10 pitch minimum by purely local redistribution, and some of the authorities with the highest requirements cannot divert requirements elsewhere. The scenario is also complex to formulate and explain. It was rejected.
- **Scenario E:** This scenario is intended to give weight to Section 4(4) Advice which was sought on different Options. Authorities covered by Section 4(4) Advice which explicitly argued in favour always meeting requirements on a ‘need where it arises’ basis (Herefordshire, Shropshire and the conurbation authorities) retain their base (need where it arises) requirements. Elsewhere pitches are redistributed as in Scenario C so that none of these authorities has an allocation of less than 10 pitches. It is less redistributive than Scenario C both because some authorities in the conurbation retain very low pitch requirements, and Herefordshire, which has the highest ‘need where it arises’ requirement retains all its pitches. This scenario was taken forward to the RSS Gypsy and Traveller Reference Group as moderately redistributive, in line with local authority preferences and therefore more deliverable. It was also felt this scenario indicated that the Assembly had taken notice of the Advice offered.
- **Scenario F:** Under scenario F half of requirements are allocated according to the base (need where it arises) distribution. The other 50% is allocated in proportion to the district’s share of total regional housing proposals (RSS Phase 2 Revision preferred option, and Black Country Core Strategy Preferred Option). There are three arguments in favour of aligning an element of the pitch allocation with bricks and mortar housing development proposals: it reflects the desire to mainstream Gypsy and Traveller site provision; it maximises potential for sites to be provided in conjunction with major housing developments; and it might be seen to reflect patterns

of employment opportunities for Gypsies and Travellers. However, allocating 50% scenario produces a major shift from the more rural areas of the region primarily towards the conurbation authorities. The extent of this shift in pitch allocations away from the need where it arises base suggests that this scenario would be both unsustainable and undeliverable, not least because of land values. Unauthorised development might continue in more rural areas.

- **Scenario G:** This scenario sought to mitigate the major and unrealistic redistributive effect of Scenario F by reducing the proportion of pitch requirements allocated in line with regional housing proposals. It is similar to Scenario F, except that 75% of requirement is allocated in line with the base (need where it arises) distribution and 25% according to the proportion of regional housing proposals. The redistributive effect is less marked, but still from broadly rural areas to the conurbation. This scenario was taken to the RSS Gypsy and Traveller Reference Group for comment.

40. Table 5 shows the effects in terms of pitch gains and losses of each of these scenarios at 'county' level (combining Shropshire, Herefordshire and Telford & Wrekin, combining Stoke on Trent with Staffordshire, and grouping the metropolitan boroughs together). The figures in the table are the difference in pitch numbers between the particular scenario and Option 1. It is important to note that, while some scenarios are not very redistributive at this scale, they all have quite significant effects at the level of individual local authorities.

**Table 5: Effect of Option 3 Scenarios (October 2008) at 'County' Level: Differences from Option 1**

Area	Option 3 Scenarios						
	A	B	C	D	E	F	G
Shropshire/Herefordshire/ Telford & Wrekin	-38	-34	-8	+3	-2	-22	-11
Staffordshire/Stoke on Trent	+32	+23	+1	-2	+2	-15	-8
Warwickshire	-27	-28	-12	+17	-12	-25	-13
Worcestershire	-9	+5	+9	+7	+12	-23	-11
Conurbation	+43	+33	+10	+9	0	+85	+43

41. Scenarios E and G were developed for discussion with the RSS Gypsy and Traveller Reference Group in December 2008. By this stage, thinking on Option 2 had progressed and the decision had been taken to consider the 10 year period 2007-2017 in framing allocation scenarios. Option 3 scenarios E and G were therefore re-run over the 10 year period (2007-2017); in addition Shropshire was treated as a single entity. The re-run scenarios are detailed in Appendix 7.

42. The RSS Gypsy and Traveller Reference Group discussion suggested:

- Little merit was seen in the scenario in which 25% of requirements are allocated in line with bricks and mortar housing proposals. Locational considerations for bricks and mortar housing and for Gypsy and Traveller sites were thought to be different. This scenario was rejected.
- It was strongly felt that Advice should not be permitted to over-ride the principle of giving every local authority a minimum pitch allocation. It was also pointed out that the Advice process might introduce inconsistencies into a local authority allocation process because of differences between unitary and county strategic planning authorities: unitary authorities both provide Advice and receive an allocation while in county areas, the Advice is given by the County Council, but the allocation primarily affects the districts. This scenario was also rejected.

43. Following this meeting, CURS produced two further variants of Option 3 (see Appendix 8):

- **Scenario H** sought to compromise between Scenario E as taken to the RSS Gypsy and Traveller Reference Group by ensuring that all local authorities have a minimum requirement allocation of 14 pitches (over 10 years) regardless of their Section 4(4) Advice, but that Advice is respected and 'need where it arises' allocations are retained wherever the minimum is met. Apart from meeting minimum requirements in Coventry and Sandwell, other redistribution only takes place outside Herefordshire, Shropshire and the conurbation. This was felt not to have particular merit. It added complexity without necessarily increasing sustainability, deliverability or acceptability.
- **Scenario I** was effectively a re-run of Scenario C setting a 14 pitch minimum allocation and redistributing pitches to meet this minimum from other authorities across the Region such that those authorities with the highest Option 1 (need where it arises) allocation lose most pitches. This has been taken forward as the preferred formulation of Option 3.

44. One further variant of Option 3 was tested in March 2009 (Appendix 9). This was developed in response to Elected Member comments, made at WMRA's Strategy Advisory Panel meeting held on 4 March 2009, that a further Option should be formulated which extended the choice for districts. Option 3 **Scenario J** follows the redistributive method of Scenario I except that a minimum pitch allocation of 20 rather than 14 pitches is imposed over the 10 year period 2007-2017. This is obviously more redistributive than Option 3 Scenario I. It has the effect of reinforcing allocation increases over Option 1 in Staffordshire, Worcestershire and the conurbation, and decreasing allocations in Warwickshire and particularly in Herefordshire / Shropshire / Telford & Wrekin. At 'county' level the effect over and above that created in Option 3 Scenario I is quite small. However, the impact is much greater at the level of individual authorities, possibly affecting contentiousness and deliverability. For these reasons, Option 3 Scenario J was rejected.

45. Table 6 overleaf sets out the preferred formulation of Option 3 at district level and compares it with Option 1 which might be regarded as the base position of need where it arises. There are three steps in allocating pitch requirements in line with this formulation of Option 3:

- First, the authorities with 'need where it arises' requirements less than 14 are identified. There are eight such authorities (Lichfield, Staffordshire Moorlands, Tamworth, Warwick, Bromsgrove, Redditch, Coventry and Sandwell). Together, these authorities have 'need where it arises' requirements for 42 pitches compared with the 112 pitches required to give the 14 pitch minimum. This means that 70 pitches (112 minus 42) must be diverted from elsewhere to produce the minimum allocation in these authorities. Each of these eight authorities has a 14 pitch allocation in Table 6.
- The second step is to calculate how many pitches are required on a 'need where it arises' basis in the authorities where such requirements are equal to or greater than the minimum of 14 pitches. This total is 897 (939 total requirement less 42 pitches attributable to the authorities under the minimum threshold).
- The third step is to 'divert' 70 pitches to the eight authorities with less than the 14 pitches required on a 'need where it arises' basis. This is done pro rata to the level of 'need where it arises' requirements. Each 'exporting' authority's share of the 70 diverted pitches is calculated according to its share of the 'need where it arises' requirement of 897 calculated in step 2. This is then subtracted from the 'exporting' authority's 'need where it arises' requirement. For example, South Staffordshire has a 'need where it arises' requirement of 50 pitches, which represents roughly 5.6% of

the total requirement of 897 pitches. 5.6% of 70 is just under 4 which is the amount by which the South Staffordshire ‘need where it arises’ requirement is reduced in Table 6 (50 minus 4 = 46).

**Table 6: Preferred Option 3: Pitch Requirements at District Level and Comparison with Option 1**

Local authority	Pitch requirements 2007-2017		Difference between Options 1 and 3
	Option 1	Option 3	
<b>Staffordshire</b>			
Cannock Chase	35	32	-3
East Staffordshire	15	14	-1
Lichfield	11	14	+3
Newcastle-under-Lyme	20	19	-1
South Staffordshire	50	46	-4
Stafford	37	34	-3
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
<b>Warwickshire</b>			
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	27	-2
Rugby	66	61	-5
Stratford-on-Avon	45	41	-4
Warwick	13	14	+1
<b>Worcestershire</b>			
Bromsgrove	3	14	+11
Malvern Hills	33	30	-3
Redditch	0	14	+14
Worcester	22	20	-2
Wychavon	66	61	-5
Wyre Forest	44	41	-3
<b>Metropolitan districts</b>			
Birmingham	19	18	-1
Coventry	3	14	+11
Dudley	21	19	-2
Sandwell	3	14	+11
Solihull	26	24	-2
Walsall	39	36	-3
Wolverhampton	36	33	-3
<b>Unitary authorities</b>			
Herefordshire	109	100	-9
Shropshire	93	86	-7
Stoke-on-Trent	40	37	-3
Telford & Wrekin	34	31	-3
<b>West Midlands</b>	<b>939</b>	<b>939</b>	<b>0</b>

46. This formulation of Option 3 has two particular merits:

- It means that there will be authorised provision in all parts of the Region, thus increasing potential choice for Gypsies and Travellers.
- It retains a distribution in which authorities with relatively high base figures still have relatively high allocations – thus it retains a significant element of ‘need where it arises’ requirement and might be assumed to reflect existing communities and their connections, and desires to retain these links in the future.

47. Its main limitation is the practicalities of delivery. It implies that some requirements might be diverted to distant areas where the Gypsies and Travellers in need may have no

connections. In terms of the broad geography of redistribution relative to Option 1 and 'need where it arises' requirements:

- Staffordshire and Stoke-on-Trent gain 7 pitches overall.
- Warwickshire loses 11 pitches overall.
- Worcestershire gains 12 pitches overall.
- The metropolitan districts of the conurbation gain 11 pitches overall.
- Shropshire, Herefordshire and Telford & Wrekin lose 19 pitches overall.

48. While the shifts between sub-regions are relatively modest, this Option is significantly redistributive at district level, particularly for the authorities with fewer than 14 pitches required on a 'need where it arises' basis. Thus Redditch gains 14 pitches. The biggest reduction in requirements compared with Option 1 is 9 pitches in Herefordshire.

### **Transient Pitches for Gypsies and Travellers**

49. Paragraph 15 summarised how the regional requirement for transient pitches for Gypsies and Travellers was established drawing on the GTAA-amended figures presented in Appendix Table A2 of the Overview report (Appendix 2 of this note) with further minor amendments. These figures include an assessment of requirements on a 'need where it arises' basis.

50. The following factors were considered in relation to the possibility of generating Options for allocating transient pitch allocations:

- There is no known regional precedent for generating Options for transient pitch allocations. The South West included a single 'need where it arises' allocation. Neither the East of England nor the South East of England RSS Reviews included an assessment of transit pitch requirements at local authority level so the question of Options did not arise.
- Very little is known, in a research sense, about travelling patterns of Gypsies and Travellers and thus transient pitch needs. It is recognised that there are many motives for travelling (work, visiting family, going to fairs, having a holiday, etc) with potentially different locational implications. In this context, it is hard to identify criteria on which to generate alternative pitch distributions for Options.
- One potential criterion is the major road network including motorways. This was mapped as part of the Land Use Consultants work. In the West Midlands, the network is such that no local authority is isolated from a major route of some kind. While this factor may be relevant in terms of determining the appropriate location of sites at a local level, it fails to discriminate at a strategic level.
- At the South West RSS Review Examination in Public, Gypsy and Traveller representatives argued that transit provision should be made in all local authorities visited by Gypsies and Travellers, and this principle appears to have been accepted by the Panel. In the West Midlands, the amended-GTAA figures already indicate the need for provision in all but two local authority areas.

51. Bearing these points in mind, it was decided that consultation should take place on a single distribution of transient pitch requirements, primarily on a 'need where it arises' basis from the GTAs. Table 7 sets out the preferred distribution. In addition, policy related to transit pitches will encourage joint working between authorities to allow identification of suitable sites over a wider geographical area and thereby contribute to speedier delivery. Those authorities with a zero allocation in Table 7 will be encouraged to work towards establishing some form of transient provision in order to contribute to the creation of a comprehensive 'Transitory Network' for the Region.

**Table 7: Distribution of Transient Pitch Requirements**

<b>Unitary Authorities:</b>	
Shropshire	35 pitches
Herefordshire	10 pitches
Telford & Wrekin	10 pitches
Stoke-on-Trent	10 pitches
	<b>65 pitches TOTAL</b>
<b>Staffordshire:</b>	
Cannock Chase DC	5 pitches
East Staffordshire BC	5 pitches
Lichfield DC	5 pitches
Newcastle-under-Lyme BC	5 pitches
South Staffordshire DC	5 pitches
Stafford BC	2 pitches
Staffordshire Moorlands DC	2 pitches
Tamworth BC	5 pitches
	<b>34 pitches TOTAL</b>
<b>Warwickshire:</b>	
North Warwickshire DC	5 pitches
Nuneaton & Bedworth BC	5 pitches
Rugby BC	5 pitches
Stratford-on-Avon DC	10 pitches
Warwick DC	15 pitches
	<b>40 pitches TOTAL</b>
<b>Worcestershire:</b>	
Bromsgrove DC	0 pitches
Malvern Hills DC	10 pitches
Redditch BC	18 pitches
Worcester CC	20 pitches
Wychavon DC	20 pitches
Wyre Forest DC	0 pitches
	<b>68 pitches TOTAL</b>
<b>West Midlands:</b>	
Birmingham CC	15 pitches
Coventry CC	5 pitches
Solihull MBC	5 pitches
Dudley MBC	3 pitches
Sandwell MBC	3 pitches
Walsall MBC	3 pitches
Wolverhampton CC	3 pitches
	<b>37 pitches TOTAL</b>
<b>West Midlands Region</b>	<b>244 pitches</b>

#### **Plots for Travelling Showpeople**

52. Paragraph 16 noted acceptance of the figures and distribution from Appendix Table A2 of the Overview report (Appendix 2 of this report) for plot requirements for Travelling Showpeople for the period 2007-2012. This gives a regional total of 118 plots distributed between local authorities on the basis of 'need where it arises' as evidenced by the GTAs.

53. The views of the Midlands Section of the Showmen's Guild of Great Britain were sought on both overall requirements numbers and possible distributions. The Guild was unable to provide definitive advice on these issues. They noted that family links are important to Travelling Showpeople for economic and social reasons; such links tend to reinforce a desire to remain in areas of current settlement. However, the Guild also noted that Showpeople are highly adaptable and previously have had sites/yards in many more local authorities across the West Midlands than now.

54. Due to the variable treatment in GTAAAs, it was decided to restrict consideration of requirements for Travelling Showpeople to a five year period 2007-2012. There is less established practice than in relation to Gypsies and Travellers on what would be the appropriate family growth rate to apply for future periods for Showpeople. In addition, there may be factors affecting the future of the trade which are currently unknown but which could have accommodation consequences.

55. It was also decided that the appropriate level of analysis would be at a 'county' rather than district level. There were two reasons for this:

- It follows the precedents set in the South West and East of England by Examination in Public Panels (and later accepted in Secretary of State's Proposed Changes)<sup>5</sup>.
- It reflects the reality of planning for sites/yards for Travelling Showpeople. At district level, numerical requirements are likely to be low in any area. The economics of site/yard provision suggest that, if an existing site cannot be extended, a larger site is likely to be provided than would meet the plot requirements of a single district. In this context, it would be sensible to encourage authorities to work together to identify, in consultation with local Showpeople, the most appropriate locations across the wider area.

56. Thus the plot allocations are based on the following geographical areas:

Herefordshire, Shropshire and Telford & Wrekin  
Staffordshire and Stoke on Trent  
Warwickshire  
Worcestershire  
West Midlands conurbation

57. Where GTAAAs did not correspond to county areas, the 'county' totals were reached by adding together the appropriate district requirement figures from the GTAAAs. This affects Staffordshire (spilt between two GTAAAs) and Warwickshire (split between two GTAAAs). The figures from the Black Country and Birmingham/Coventry/Solihull GTAAAs are added together to reach the conurbation total.

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<sup>5</sup> *Regional Spatial Strategy for the South West : Review of Additional Pitch Requirements for Gypsies and Travellers : Examination in Public Report of the Panel*, April 2008. At:

<http://www.gos.gov.uk/497666/docs/166217/622079/fullpanelreport>

*The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes – for public consultation July 2008* At:

[http://gosw.limehouse.co.uk/portal/regional\\_strategies/drss?pointId=109242](http://gosw.limehouse.co.uk/portal/regional_strategies/drss?pointId=109242)

*Regional Spatial Strategy Single Issue Review Planning for Gypsy and Traveller Accommodation in the East of England : Examination in Public Report of the Panel*, December 2008 At:

[http://www.gos.gov.uk/goee/docs/Planning/Regional\\_Planning/808762/ReportfinalrevDec08.pdf](http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/808762/ReportfinalrevDec08.pdf)

*Accommodation for Gypsy and Travellers and Travelling Showpeople in the East of England : The Secretary of State's Proposed Changes to the Draft Revision of the Regional Spatial Strategy and Statement of Reasons*, March 2009 At: [http://goe-consult.limehouse.co.uk/portal/rss\\_gt\\_proposed\\_changes/gtproposedchanges?pointId=12380860886](http://goe-consult.limehouse.co.uk/portal/rss_gt_proposed_changes/gtproposedchanges?pointId=12380860886)

58. A single redistributive Option was developed in addition to Option 1 which is on a ‘need where it arises’ basis from the GTAAAs. This was prompted by the fact that, under Option 1, over half of the additional pitch requirements arise in the conurbation. This reflects the pattern of current provision, but could lead to implementation challenges over land supply and land values. Appendix 10 is a note produced by Pat Niner (CURS) in early January 2009 which provides the rationale for a redistributive approach and describes how the Options have been developed. Two versions of a redistributive Option 2 are outlined, one which re-allocates a third of the conurbation requirement to Shropshire/Herefordshire/Telford & Wrekin and Warwickshire, and one of which re-allocates half of the conurbation requirement to the same areas.

59. Members of the RSS Gypsy and Traveller References Group thought that the less redistributive version of Option 2 would be more politically acceptable, and this version was preferred. The plot allocation Options for Travelling Showpeople agreed for consultation are shown in Table 8.

**Table 8: Distribution of additional Plot requirements for Travelling Showpeople 2007 – 2012**

<b>Sub-region</b>	<b>Option 1</b>	<b>Option 2</b>
Shropshire / Herefordshire / Telford & Wrekin	9 plots	19 plots
Staffordshire / Stoke on Trent	23 plots	23 plots
Warwickshire	1 plot	12 plots
Worcestershire	22 plots	22 plots
West Midlands Conurbation	63 plots	42 plots
<b>Region</b>	<b>118 plots</b>	<b>118 plots</b>

## **Consultation on Options for the Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople - June to August 2009**

60. As there were a number of choices as to the nature and content of new or revised policies, the Regional Assembly issued an Options consultation document in June 2009 to identify those choices and the consequences of adopting them. Responses to the consultation were taken into account in the development of the Interim Policy Statement.

61. A full summary of the responses to the Options consultation can be downloaded from the WMRA website at:

[http://www.wmra.gov.uk/Planning\\_and\\_Regional\\_Spatial\\_Strategy/RSS\\_Revision/RSS\\_Revision\\_Phase\\_3.aspx](http://www.wmra.gov.uk/Planning_and_Regional_Spatial_Strategy/RSS_Revision/RSS_Revision_Phase_3.aspx)

62. The Options Consultation included three Options for allocating pitch requirements at local planning authority level:

- Option 1: need where it arises from the GTAA
- Option 2: 75% allocated according to need where it arises and 25% according to planning constraints and opportunities
- Option 3: redistribution of requirements to ensure that all authorities provide at least 14 additional pitches

63. A third (34%) of consultees thought the three Options provided a good range of solutions, 50% thought that they did not and 16% were undecided. The main reason given by those thinking the Options inadequate was that they were insufficiently redistributive and all tended to perpetuate, to too great an extent, current imbalances and patterns of provision.

64. Opinion was split on which Option consultees preferred: 36% preferred Option 1, 23% preferred Option 2, 24% preferred Option 3 and 18% preferred none of the specified Options while making a relevant comment. Many in this last group thought the Options insufficiently redistributive. Further analysis showed:

- There were fundamental and irreconcilable differences in preferences between different categories of consultee over whether a redistributive Option was preferred. Three-quarters of Gypsy and Traveller individual consultees preferred the non-redistributive Option 1 (so that family links could be retained) while the majority of other consultees preferred one of the redistributive Options to widen areas of provision and share 'the burden'.
- About 7 out of 10 local authorities preferred a redistributive Option, but this was split between Option 2, Option 3 and none of the Options on the grounds that none was sufficiently redistributive.
- There was no consensus between local authorities across the region or within sub-regions on the preferred Option.
- Accepting the preferred Options identified by local authorities is incompatible with retaining the regional total of 939 additional residential pitches to be provided. Most local authority consultees preferred the Option which gave their authority the lowest additional requirement. Combining preferred Options would have the effect of lowering the regional total by up to 20% which was unacceptable.

65. The Sustainability Appraisal noted that differences between pitch requirements in the Options were relatively small both at sub-regional and local authority level; all had the same overall regional total. Despite difficulties in appraising the relative effects and implications of the three Options, it concluded that Option 2, which was partially informed by planning constraints and opportunities, may perform better than the other Options on criteria related to travel and transport, flood risk, environmental assets and biodiversity. The Options were

probably equal in terms of poverty, health, access to services and sustainable communities. The conclusions of the Sustainability Appraisal in favour of Option 2 were felt to be insufficiently strong and decisive to determine Option choice alone for two different reasons:

- The methodology used means that the Sustainability Appraisal could not take account of sustainability in the sense of 'deliverability' or the extent to which the Options reflect Gypsy and Traveller preferences and were therefore likely to prevent continuing unauthorised development of sites in 'preferred' locations despite provision elsewhere.
- Option 2 was preferred by less than a quarter of consultees.

#### **Consultation on the Draft Interim Policy Statement with Local Authorities and Gypsy & Traveller Reference Group: November 2009**

66. Further consultation was undertaken in November 2009 with local authorities, other stakeholders and the Gypsy and Traveller Reference Group on a draft of the Interim Regional Policy Statement.

67. All representations were carefully considered and taken into account where possible. In particular, evidenced amendments to GTAA's findings on current pitch provision figures and requirements were incorporated.

68. Two responses to the CEO consultation included factual evidence with implications for the regional pitch total:

- North Warwickshire noted that investigations for a planning application had shown that the GTAA had counted caravans rather than pitches on one private site, and had also, through a misunderstanding of information supplied, double-counted the same site both as an unauthorised development and as an authorised site with a temporary planning permission due to expire before 2012. Remedyng these errors had the effect of reducing North Warwickshire's need where it arises pitch requirements 2007-2017 by 8 pitches (from 18 to 10).
- Stratford on Avon reported that a Planning Inspector had found that their GTAA had under-stated requirements by 7 pitches by omitting the needs of a group seeking to develop a site in the district. This raised Stratford's need where it arises requirements 2007-2017 by 7 (from 45 to 52).

69. The net effect of these two factors was to reduce the regional pitch requirement 2007-2017 by 1 pitch (from 939 to 938). This was the base for the Second Draft Interim Policy Statement.

70. In the context of such polarisation of consultation opinion and lack of consensus on which Option was preferred, the First Draft Interim Policy Statement included a new further Option developed so as to combine elements of each of the Consultation Options. This was based on the, then, regional pitch requirement of 939 pitches and did not include the adjustments since made to North Warwickshire and Stratford on Avon requirement base.

71. The principles underlying the proposed allocation of residential pitches between local authorities were:

- The regional total of additional pitches 2007-2017 (939 for First Draft and 938 for Second Draft), based primarily on the GTAA's, is to be achieved.

- There is need to take a strategic view across local authorities in accordance with Circular 1/2006, and not simply to develop strategy just on the views of the individual authorities themselves taken in isolation.
- ‘Need where it arises’ (Option 1 in the Options Consultation) as estimated by the region’s GTAAAs was the starting point. This is in accord with Gypsy and Traveller community wishes and those of some authorities, as expressed in the Options Consultation.
- A limited redistribution of pitches was undertaken to reduce the number of additional pitches to be provided in some districts where Option 1 requirements were particularly high. The primary objective was, where possible, to increase deliverability by reducing the task for districts which have already made significant provision. An ideal maximum additional requirement was set at 42 pitches, three times the figure 14 which was used as a minimum pitch requirement (for a local authority area though not necessarily all on one site) in Consultation Option 3 as a minimum sustainable Gypsy and Traveller community to recognise family links and avoid isolation. Appendix 11 provides further information on the derivation of the 14 pitch minimum and 42 pitch maximum premises.
- In order to maintain the regional total of pitches, redistribution obviously requires additional pitches to be provided in some other districts. Thus a decrease in any local authority area’s allocation must be balanced by an increase in provision in other local authorities nearby. This has been done on a case by case basis, aiming to ‘divert’ pitches over as short a distance as possible while at the same time increasing choice for Gypsies and Travellers by raising provision in some districts with low requirements under Consultation Option 1 (need where identified in the GTAA).

72. These principles were applied at both First and Second Draft stages. There were two reasons why changes were necessary between First and Second Drafts:

- The changes noted above affecting the need where it arises pitch requirements for North Warwickshire and Stratford on Avon. This affected allocations as well as the regional pitch requirement base. North Warwickshire ‘imported’ pitches in the First Draft. Stratford was an ‘exporter’ with a need where it arises total over the 42 pitch maximum threshold in the First Draft, and the changes increased the ‘excess’ to be re-allocated.
- A very strongly argued response to the Chief Executive Officer (CEO) consultation from Coventry which expressed reasoned objections to First Draft pitch ‘imports’.

73. Table 9 (overleaf) summarises the rationale for the allocation at local authority level and First and Second Draft stages. Column 2 shows Consultation Option 1 figures (need where it arises); column 3 shows the allocation in the First Draft and column 4 the allocation in the Second Draft of the Interim Policy Statement. The final column summarises the rationale for the allocations distinguishing First Draft (normal font) and changes introduced in the Second Draft (italics). The North Warwickshire and Stratford on Avon changes in the Option 1 figures are also shown in italics.

**Table 9: Derivation of Preferred Option Allocation of Additional Residential Pitch Requirements: Draft 1 and Draft 2**

<b>Local authority</b>	<b>Consultation Option 1</b>	<b>Provision in Regional Policy Statement</b>		<b>Derivation Draft 1 Reason for change between Draft 1 and Draft 2</b>
		<b>Draft 1</b>	<b>Draft 2</b>	
Cannock Chase	35	35	35	Need where it arises from GTAA <i>No change</i>
East Staffordshire	15	15	15	Need where it arises from GTAA <i>No change</i>
Lichfield	11	14	14	Increased allocation for pitches (3) diverted from South Staffordshire <i>No change</i>
Newcastle under Lyme	20	20	20	Need where it arises from GTAA <i>No change</i>
South Staffordshire	50	42	42	Reduced to 42 pitch allocation; pitches diverted to Lichfield (3), Sandwell (2) and Telford & Wrekin (3) <i>No change</i>
Stafford	37	37	37	Need where it arises from GTAA <i>No change</i>
Staffordshire Moorlands	2	2	2	Need where it arises from GTAA; unrealistic to increase allocation because of isolation from existing areas of Gypsy and Traveller settlement and lack of evidence of demand to live in the area <i>No change</i>
Stoke on Trent	40	40	40	Need where it arises from GTAA <i>No change</i>
Tamworth	7	7	10	Need where it arises from GTAA <i>Increased allocation for pitches (3) diverted from Rugby</i>

Local authority	Consultation Option 1	Provision in Regional Policy Statement		<b>Derivation Draft 1</b> <b>Reason for change between Draft 1 and Draft 2</b>
		Draft 1	Draft 2	
North Warwickshire	18 10	21	16	Increased allocation for pitches (3) diverted from Rugby <i>Base GTAA figure (as in Consultation Option 1) reduced by 8 pitches to 10 to remedy GTAA errors. Increased allocation for pitches (6) diverted from Rugby</i>
Nuneaton & Bedworth	29	29	29	Need where it arises from GTAA <i>No change</i>
Rugby	66	42	42	Reduced to 42 pitch allocation; pitches diverted to North Warwickshire (3), Warwick (4) and Coventry (17) <i>Reduced to 42 pitch allocation; pitches diverted to Tamworth (3), North Warwickshire (6), Warwick (3) and Coventry (12)</i>
Stratford on Avon	45 52	42	42	Reduced to 42 pitch allocation; pitches (3) diverted to Warwick <i>Base GTAA figure (as in Consultation Option 1) raised by 7 pitches to 52 to take account of Planning Inspector's decision. Reduced to 42 pitch allocation; pitches diverted to Warwick (7), Redditch (1) and Solihull (2)</i>
Warwick	13	20	23	Increased allocation for pitches diverted from Rugby (4) and Stratford on Avon (3) <i>Increased allocation for pitches diverted from Rugby (3) and Stratford on Avon (7)</i>

Local authority	Consultation Option 1	Provision in Regional Policy Statement		<b>Derivation Draft 1</b> <b><i>Reason for change between Draft 1 and Draft 2</i></b>
		Draft 1	Draft 2	
Bromsgrove	3	14	14	Increased allocation for pitches (11) diverted from Wychavon <i>No change</i>
Malvern Hills	33	33	33	Need where it arises from GTAA <i>No change</i>
Redditch	0	13	14	Increased allocation for pitches diverted from Wychavon (13) <i>Increased allocation for pitches diverted from Stratford on Avon (1) and Wychavon (13)</i>
Worcester	22	22	22	Need where it arises from GTAA <i>No change</i>
Wychavon	66	42	42	Reduced to 42 pitch allocation; pitches diverted to Bromsgrove (11) and Redditch (13) <i>No change</i>
Wyre Forest	44	42	42	Reduced to 42 pitch allocation; pitches diverted to Dudley (2) <i>No change</i>

Local authority	Consultation Option 1	Provision in Regional Policy Statement		<b>Derivation Draft 1</b> <i>Reason for change between Draft 1 and Draft 2</i>
		Draft 1	Draft 2	
Birmingham	19	19	19	Need where it arises from GTAA <i>No change</i>
Coventry	3	20	15	Increased allocation for pitches (17) diverted from Rugby <i>Increased allocation for pitches (12) diverted from Rugby</i>
Dudley	21	23	23	Increased allocation for pitches (2) diverted from Wyre Forest <i>No change</i>
Sandwell	3	5	5	Increased allocation for pitches (2) diverted from South Staffordshire <i>No change</i>
Solihull	26	26	28	Need where it arises from GTAA <i>Increased allocation for pitches (2) diverted from Stratford on Avon</i>
Walsall	39	39	39	Need where it arises from GTAA <i>No change</i>
Wolverhampton	36	36	36	Need where it arises from GTAA <i>No change</i>

<b>Local authority</b>	<b>Consultation Option 1</b>	<b>Provision in Regional Policy Statement</b>		<b>Derivation Draft 1 Reason for change between Draft 1 and Draft 3</b>
		<b>Draft 1</b>	<b>Draft 2</b>	
Herefordshire	109	109	109	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land <i>No change</i>
Shropshire	93	93	93	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land <i>No change</i>
Telford & Wrekin	34	37	37	Increased allocation for pitches diverted from South Staffordshire <i>No change</i>
<b>West Midlands Region</b>	<b>939</b>	<b>939</b>	<b>938</b>	Regional total requirement maintained <i>Reduction of 1 pitch – see net effect of changes in North Warwickshire and Stratford on Avon</i>

74. A further factor taken into account, where possible, was the extent of unconstrained land within an opportunity footprint (for access to services) in the authority. This information was developed at the Options stage by Land Use Consultants. The extent of opportunity footprint on unconstrained land in hectares is shown alongside other basic information in Appendix 12.

75. Local authorities with a need where it arises requirement of over 42 pitches can be conveniently considered in four sub-regional groupings:

- Shropshire and Herefordshire: both unitary authorities have relatively high current provision and need where it arises requirements. There was no redistribution because of the large spatial size of these authorities and the extent of unconstrained land available.
- South Staffordshire: South Staffordshire had 8 pitches in excess of the 42 threshold. These have been shared between Lichfield, Sandwell and Telford & Wrekin as the geographically closest areas with either low need where it arises requirements (Lichfield and Sandwell) or high capacity evidenced by the extent of unconstrained land (Telford & Wrekin). Individually the increased allocations are small and never exceed 3 pitches. Pitch allocations in Cannock Chase, Stafford, Wolverhampton and Walsall were not increased despite their proximity to South Staffordshire because of their relatively high current provision and need where it arises requirements. In addition, the Habitats Regulations Review of the draft Interim Policy Statement highlighted the sensitivity of Cannock Chase as a significant European site.
- Wychavon and Wyre Forest: together these authorities have requirements 26 pitches in excess of the 42 pitch maximum. Requirements were diverted from Wychavon to adjoining Bromsgrove and Redditch, both of which have very low current provision and need where it arises requirements. In both instances the allocation achieves the 14 pitch threshold set for a sustainable community. Two pitches were diverted from Wyre Forest to Dudley primarily on the grounds of geographical proximity, easing the sub regional pressure with only marginal impact on adjoining authority areas.
- Rugby and Stratford on Avon: together these authorities have requirements 34 in excess of the 42 pitch threshold. Pitches have been diverted to Redditch, Solihull, Warwick, Coventry, North Warwickshire and Tamworth. Diversions are primarily determined by proximity and/or accessibility along the A5 route which formed the underlying rational for the Local Authorities' GTAA in this area. Diversions in excess of 3 pitches to Warwick, Coventry and North Warwickshire were made on the grounds of current provision and 'needs where they arise' requirements which are low relative to other authorities in this sub-region. The allocation to Nuneaton & Bedworth was not increased because it has the highest current provision and requirements among potential 'importers' of pitches. Because of the geography in this sub-region and paucity of re-allocation options, it has not been possible to take significant account of extent of unconstrained opportunity land.

Table 10 shows the very limited number of areas where the basic principles of allocation (see above) were not met.

<b>Table 10: Authorities where Allocation Principles are Not Met</b>	
<b>Local authority</b>	<b>Comment</b>
Staffordshire Moorlands	Taking account of current provision, there will still be fewer than 14 pitches. There is no evidence of Gypsies and Travellers seeking pitches in Staffordshire Moorlands and the area is remote from 'exporting' areas.
Tamworth	Taking account of current provision, there will still be fewer than 14 pitches. Tamworth has relatively little unconstrained opportunity land.
Sandwell	Sandwell has been allocated fewer than 14 additional pitches. However, taking account of current provision, there will be more than 14 as a sustainable community. Sandwell has relatively little unconstrained opportunity land.
Herefordshire	The allocation is in excess of 42 additional pitches, justified by the size of the authority and the extent of unconstrained opportunity land.
Shropshire	The allocation is in excess of 42 additional pitches, justified by the size of the authority and the extent of unconstrained opportunity land.

76. Opinions in the Options Consultation differed on whether the total **transit pitch requirements** (244) would meet the accommodation needs of Gypsies and Travellers. 39% thought the figure was about right, 28% thought it was too low, 17% that it was too high, and 17% made some other comment. Gypsy and Traveller individuals were most likely to think the figures too low. Many of those who thought residential pitch requirements too high also thought transit requirements were too high.

77. A single geographical distribution of transit provision was consulted on, based on the findings of the sub-regional Gypsy and Traveller Accommodation Assessments. 35% of consultees thought that this distribution would meet the accommodation needs of Gypsies and Travellers; 52% thought that it would not and 14% were not sure. Reasons for thinking the distribution would not meet needs included the need for a more even spread across the region, fear of over-provision in some areas and need for greater provision in metropolitan and urban areas.

78. The consultation on transit provision included the encouragement of joint working between local authorities to allow identification of suitable sites over a wider geographical area, thus contributing to speedier delivery. Where the GTAA had identified a nil need for provision (two districts only) authorities were encouraged to work towards establishing some form of transient provision and contribute to the creation of a comprehensive transitory network across the region.

79. The consultation asked whether the draft policy for transit provision should be strengthened. 46% thought that it should and referred to delivery mechanisms which might be included. 49% thought that the draft policy should not be strengthened and 5% were not sure.

80. In view of the range and balance of opinion it was felt appropriate to retain the principle of basing both the regional total and the distribution of transit pitches on the evidence from the GTAAAs. Three amendments/amplifications were made in response to the detail of the Options and later consultations:

- The definition of 'transit pitches' was amplified to make clear that it included both formal transit site pitches and other less formal stopping places or emergency stopping places. This was always the intention, but was spelled out more explicitly.
- Birmingham drew attention to an error in transfer of information from the GTAA (10 pitches) to the figure for their transit requirements in the Options Consultation (15 pitches). This was remedied.
- Shropshire argued that their Options Consultation requirement (35 pitches) was significantly higher than indicated by their GTAA which had been less explicit in quantifying need for stopping places (beyond a formal transit site which was specified). The total (35 pitches) was significantly higher than any other authority. These points were felt to have weight and the Shropshire requirement has been reduced to 20 transit pitches.

81. The consequence of these amendments was to reduce the regional transit pitch requirement from 244 to 224 pitches. The principle of distribution remained the need where it arises approach from the GTAAAs.

82. The regional plot requirements for **Travelling Showpeople** in the Options consultation was taken directly from the GTAAAs. There was some agreement amongst those responding to the Options consultation that the number of plots allocated for Travelling Showpeople (118) during the five year period 2007-2012 would meet these accommodation needs. 65% of consultees agreed that it would, 18% said that it would not and 17% were unsure but made a comment. Many of those not agreeing with the figures questioned the validity of the Gypsy and Traveller Accommodation Assessments as a basis for predicting need, but failed to provide alternative evidence.

83. Two Options for the distribution of plots for Travelling Showpeople were consulted upon:

- Option 1: need where it arises from the GTAAAs
- Option 2: a more redistributive Option which spreads some plot requirements from the West Midlands Conurbation

84. The majority of consultees (54%) favoured Option 1 as being in line with the wishes of the Travelling Showpeople community and metropolitan authorities. 21% favoured Option 2 as widening potential choice, and 25% did not indicate a preferred Option but made a comment. Option 1 (need where it arises) was incorporated in all Drafts of the Interim Policy Statement.

85. The Options for Travelling Showpeople were expressed on a County basis rather than at district level. 60% of consultees agreed with this approach; 19% disagreed and 21% expressed no preference.

86. No evidence was produced to suggest that the figures for the regional total or the need where it arises allocation to local authorities (Consultation Option 1) should be amended and these were retained in the Interim Policy Statement. The Midland Section Showmen's Guild has expressed its complete support for the Draft Interim Policy Statement.

87. Two issues emerged in the November 2009 consultation:

- Government Office for the West Midlands argued that, in order to be fully compliant with Circular 04/2007, plot allocation should be made at the level of individual local authorities rather than county groupings. Following precedent in Single Issue RSS Reviews in the South West and East of England, this was not done. There is no robust method of allocating small numbers of plots between local authorities for a group with a large area of search and commercial as well as residential considerations to satisfy.
- The specific requirements of a large funfair operator to relocate his depot, currently in Birmingham, to a location which might be outside the conurbation. This was taken into account by an explanatory footnote to the table of plot requirements in the Draft Interim Policy Statement and Policies relating to relocations.

**Consultation on the Draft Interim Policy Statement with Local Authorities and Gypsy & Traveller Reference Group: January - February 2010**

88. At its meeting on 15<sup>th</sup> January 2010 the Assembly Board requested a final round of consultation with local authorities via Chief Executives. Any re-distribution of pitch numbers from one local authority area would necessitate the accommodation of those pitches in at least one neighbouring authority. The Assembly Board therefore requested that any local authority which considered their figures to be too high to negotiate alternative sub-regional solutions with their neighbouring authorities. This final round of consultation took place between 22<sup>nd</sup> January and 19<sup>th</sup> February 2010. In addition to local authorities, the Draft Interim Policy Statement was also circulated to the members of the Gypsy & Traveller RSS Reference Group for comment.

89. A summary of the responses received in the final round of consultation is attached as Appendix 13.

90. In the light of evidence provided in the final round of consultation, a change was made to the transit pitch requirement for Herefordshire in Policy 3 with a reduction from 10 to 5 additional transit pitches which reduced the regional total to 219 pitches. An additional paragraph was added in response to Telford and Wrekin DC which encourages those preparing planning applications for Gypsy and Traveller accommodation to consult this Police and Fire Services for their advice, expertise and experience in ensuring the consistent delivery of high design standards in the design and layout of sites across the West Midlands.

91. No further evidence or alternative sub-regional solutions were put forward during the consultation which would justify any further changes to the Draft Interim Policy Statement.

**Approval by the West Midlands Regional Assembly**

92. The Regional Assembly Board approved the Interim Policy Statement on 17<sup>th</sup> March 2010.

## **Reference and Web links**

The evidence base comprises of both Guidance issued by Government and Regional documents:

1. ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites
2. CLG Circular 01/2007: Planning for Travelling Showpeople 3. Research report on Gypsy's and Travellers Housing Needs in the West Midlands Region, CURS 2004
3. West Midlands Regional Interim Statement on Gypsy and Traveller Policy, WMRA, March 2007
4. West Midlands Travelling Showpeople Supplement, WMRA, November 2007
5. West Midlands Regional Overview of Gypsy & Traveller Accommodation Assessments, WMRA, May 2008
6. West Midlands Regional Spatial Strategy Phase Three Review – Regional Note on Section 4 (4) Advice, WMRA, September 2008

WMRAs Gypsy and Traveller evidence base is also heavily informed by the outcomes from the six Gypsy and Traveller Accommodation Assessments which were undertaken by local authorities on a sub-regional basis:

1. North Housing Market Area GTAA – East Staffordshire, Newcastle-under-Lyme, Stafford, Staffordshire Moorlands, Stoke-on-Trent  
Website:  
[http://www.newcastle-staffs.gov.uk/housing\\_content.asp?id=A780A050&cat=1359](http://www.newcastle-staffs.gov.uk/housing_content.asp?id=A780A050&cat=1359)
2. Southern Staffordshire and Northern Warwickshire GTAA – Cannock Chase, Lichfield, South Staffordshire, Tamworth, North Warwickshire, Nuneaton & Bedworth, Rugby  
Website:  
[http://www.northwarks.gov.uk/site/scripts/google\\_results.php?q=Gypsy+and+Traveller+Accommodation+Assessments&ie=&site=&output=xml&client=&lr=&oe=&filter=0](http://www.northwarks.gov.uk/site/scripts/google_results.php?q=Gypsy+and+Traveller+Accommodation+Assessments&ie=&site=&output=xml&client=&lr=&oe=&filter=0)
3. West Housing Market Area GTAA – Bridgnorth, North Shropshire, Oswestry, Shrewsbury & Atcham, South Shropshire, Herefordshire, Telford & Wrekin (and Powys)  
Website:  
<http://www.shropshire.gov.uk/planning.nsf/open/08641C34071A249C802574C903AD21C>
4. South Housing Market Area GTAA – Bromsgrove, Malvern Hills, Redditch, Worcester, Wyre Forest, Wychavon, Stratford-on-Avon, Warwick  
Website:  
<http://bromsgrove.whub.org.uk/home/bdc-planning-lplan-corestrategy-evidencebase-1?highlightTerm=gypsy%20accommodation>
5. Black Country GTAA – Dudley, Sandwell, Walsall, Wolverhampton  
Website:  
<http://blackcountrycorestrategy.dudley.gov.uk/what-is-the-joint-core-strategy-about/evidence>

6. Birmingham, Coventry & Solihull GTAA  
Website:  
[http://www.coventry.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=17754405](http://www.coventry.gov.uk/ccm/cms-service/stream/asset/?asset_id=17754405)

The Regional Assembly has also been informed by other research/data which has been carried out within/ has association to the Traveller arena:

1. National Curriculum Assessment, GCSE and equivalent attainment and post-16 attainment by pupil characteristics in England 2005/2006 (provisional):  
SFR46/2006, National Statistics
2. The Health Status of Gypsies and Travellers in England, Report to the Department of Health, School of Health and Related Research, University of Sheffield. Van Cleemput, P, et al. 2004
3. Count of Gypsy and Traveller Caravans: Last five counts. 21 January 2008, CLG.

**APPENDIX 1: MEMBERSHIP OF THE RSS GYPSY AND TRAVELLER  
REFERENCE GROUP**

<b>Name</b>	<b>Authority / Organisation</b>
Mark Collyer	Birmingham, Coventry & Solihull GTAA
Andy Dennis	Black Country GTAA
Diane Davidson	CARA Housing Association
Pat Niner	CURS – University of Birmingham
Dennis Latham	Derbyshire Gypsy Liaison Group / Walsall Forum
Angela Powell	Equalities and Human Rights Commission
Jannine McMahon	Government Office West Midlands
Caroline Keightley	Homes & Communities Agency
Joanne Rosa	Housing team – WMRA
Steve Forrest	Housing team – WMRA
Gemma Poxon	Housing team – WMRA
Helen White	Irish Societies
Eleanor Taylor	North Housing Market Area GTAA
Robert Back	Northern Warwickshire & Southern Staffordshire GTAA
David Clarke	Planning team – WMRA
Ada Wells	Regional Spatial Strategy Policy Lead - Housing
Juliana Crowe	Rooftops Housing
Peter Newman	South Housing Market Area GTAA
Robert Leahy	Warwickshire CC
Jake Berriman	West Housing Market Area GTAA
Alistair Webster	West Mercia Constabulary
Liz Haldron	West Midland Consortium Services for Traveller Children Schools and Families
Jon Lord	West Midlands Planning Aid
Tommy Kayes	WM Branch of the Showmen's Guild
Charlie Merrin	WM Branch of the Showmen's Guild
Pat Weale	Worcestershire CC

**APPENDIX 2: APPENDIX TABLE A2 OF THE OVERVIEW REPORT**

<b>Appendix Table A2: Requirements by Local Authority: GTAs and Supplementary Estimates</b>				
<b>Local authority</b>	<b>Additional residential pitch requirements</b>		<b>Transient requirements</b>	<b>Travelling Showpeople</b>
	<b>Years 1-5</b>	<b>Years 6-10</b>		
East Staffordshire	11	4	5	0
Newcastle-under-Lyme	15	4	5	5
Stafford	22	12	2	0
Staffordshire Moorlands	2	0	2	0
Stoke-on-Trent	29	9	10	0
<b>North HMA</b>	<b>77</b>	<b>28</b>	<b>24</b>	<b>5</b>
Cannock Chase	25	8	5	5
Lichfield	9	1	5	0
South Staffordshire	32	15	5	13
Tamworth	6	1	5	0
North Warwickshire	12	5	5	0
Nuneaton & Bedworth	20	1	5	1
Rugby	48	14	5	0
<b>A5 Corridor</b>	<b>152</b>	<b>51</b>	<b>35</b>	<b>19</b>
Bridgnorth	5	1	5 'pitch' stopping places	0
North Shropshire	22	16	10 'pitch' stopping place	0
Oswestry	8	5	5 'pitch' stopping places	4
Shrewsbury & Atcham	10	3	10 pitch transit site	0
South Shropshire	18	5	5 pitch stopping places	0
Herefordshire	100	31	10 'pitch' stopping place	0
Telford & Wrekin	24	10	10 pitch transit site	5
<b>West</b>	<b>187</b>	<b>71</b>	<b>55 'pitches' 35 as stopping places</b>	<b>9 plots</b>

Local authority	Additional residential pitch requirements		Transient requirements	Travelling Showpeople
	Years 1-5	Years 6-10		
Bromsgrove	0	5	0	0
Malvern Hills	26	10	10	8
Redditch	0	5	18	14
Worcester	16	5	20	0
Wychavon	40	25	20	0
Wyre Forest	30	15	0	0
Stratford-on-Avon	34	10	10	0
Warwick	11	5	15	0
<b>South HMA</b>	<b>157</b>	<b>80</b>	<b>93 stopping places</b>	<b>22</b>
Dudley	14	8	10-12 pitches	3
Sandwell	-1	3		8
Walsall	30	9		20
Wolverhampton	25	11		2
<b>Black Country</b>	<b>67</b>	<b>31</b>	<b>10-12 pitches</b>	<b>33</b>
Birmingham	16	3	15 pitch transit site	30 plots: re-location + 5 plot net gain
Coventry	-4	3	5 'pitch' stopping places	0
Solihull	17	9	5 'pitch' stopping places	0
<b>B'ham/Cov/Solihull</b>	<b>29</b>	<b>15</b>	<b>25 pitches 10 as stopping places</b>	<b>30 plots: re-location + 5 plot net gain</b>
<b>West Midlands Region</b>	<b>669</b>	<b>276</b>	<b>243 pitches including stopping places</b>	<b>118 plots including a relocation</b>

**APPENDIX 3: NOTE OF 30 SEPTEMBER 2008 (LEADING TO OPTION 1)**

<b>Additional Permanent Pitch Requirements for Gypsies and Travellers 2007-2017</b>		
<b>Local authority</b>	<b>Additional permanent pitch requirements</b>	
	<b>2007-2012</b>	<b>2012-2017</b>
<b>Shropshire</b>		
Bridgnorth	5	1
North Shropshire	22	16
Oswestry	8	5
Shrewsbury & Atcham	10	3
South Shropshire	18	5
<b>Staffordshire</b>		
<b>Cannock Chase</b>	<b>25</b>	<b>10</b>
<b>East Staffordshire</b>	<b>11</b>	<b>4</b>
<b>Lichfield</b>	<b>9</b>	<b>2</b>
<b>Newcastle-under-Lyme</b>	<b>15</b>	<b>5</b>
<b>South Staffordshire</b>	<b>32</b>	<b>18</b>
<b>Stafford</b>	<b>22</b>	<b>15</b>
<b>Staffordshire Moorlands</b>	<b>2</b>	<b>0</b>
<b>Tamworth</b>	<b>6</b>	<b>1</b>
<b>Warwickshire</b>		
<b>North Warwickshire</b>	<b>12</b>	<b>6</b>
<b>Nuneaton &amp; Bedworth</b>	<b>20</b>	<b>9</b>
<b>Rugby</b>	<b>48</b>	<b>18</b>
Stratford-on-Avon	34	11
Warwick	11	2
<b>Worcestershire</b>		
Bromsgrove	0	3
Malvern Hills	26	7
Redditch	0	0
Worcester	16	6
Wychavon	40	26
Wyre Forest	30	14
<b>Metropolitan Districts</b>		
<b>Birmingham</b>	<b>16</b>	<b>3</b>
<b>Coventry</b>	<b>0</b>	<b>3</b>
Dudley	14	7
Sandwell	0	3
<b>Solihull</b>	<b>17</b>	<b>9</b>
Walsall	30	9
Wolverhampton	25	11
<b>Unitary Authorities</b>		
Herefordshire	83	26
<b>Stoke-on-Trent</b>	<b>29</b>	<b>11</b>
Telford & Wrekin	24	10
<b>West Midlands Region</b>	<b>660</b>	<b>279</b>

## EXPLANATORY NOTES

The combination of shading and font style in the table indicates the derivation of the figures.

These authorities are covered by the West GTAA. The GTAA provided requirement estimates for 2007-2017, and GTAA figures are included here without amendment. The figures are also those provided by authorities in their Section 4(4) Advice. The Herefordshire figures for both 2007-2012 and 2012-2017 are different from those included in the *Overview Report* (Appendix 2 of this report) because the GTAA was revised in the interim.

*These authorities are covered by the North HMA and Southern Staffordshire/Northern Warwickshire GTAAAs. The 2007-2012 figures are taken directly from the GTAAAs. In both GTAAAs, the second estimate period ran from 2012-2016, i.e. a 4 rather than a 5 year period. The requirements in the table adjust this to a 5 year period ending 2017 by adding another year's 3% increase for family formation. These figures, therefore, amend both the GTAA and the Advice but now meet the time periods requested. In addition, a typing error from the Overview Report has been corrected relating to Nuneaton & Bedworth where the second period requirement should have been 7 (from the GTAA) rather than 1 as it appeared in the Overview Report. This is now increased to 9 because of the 5 year period adjustment. For these reasons the figures for 2012-2017 included in this table differ slightly from those shown in Appendix 2 of this report.*

These authorities are covered by the South HMA. The GTAA provides estimates for the first 5 years only, and in Table 11 of the report this is shown to start in 2008. The figures in the table above assume that the requirements can be taken to relate directly to 2007-2012 (since most of the fieldwork actually took place in 2007). Figures for 2012-2017 are calculated by applying a 3%pa growth rate to the estimated pitch provision at 2012 (authorised pitches for Gypsies and Travellers from GTAA Appendix 1+ requirements 2007-2012 from GTAA Table 11).

Figures used are as follows.

LA	2007 pitches	2007-2012	2012 base	2012-2017
Bromsgrove	18	0	18	3
Malvern Hills	20	26	46	7
Redditch	0	0	0	0

Worcester	20	16	36	6
Wychavon	123	40	163	26
Wyre Forest	59	30	89	14
Stratford	36	34	70	11
Warwick	0	11	11	2

The figures for the period 2012-2017 differ from those included in the *Overview Report* (Appendix 2 of this report) because better information was provided in the interim on current pitch provision, distinguishing between sites used by Gypsies and Travellers and those used by Travelling Showpeople. This allowed improved estimates of permanent pitch requirements for Gypsies and Travellers to be made for 2012-2017.

***These authorities are covered by the Birmingham-Coventry-Solihull GTAA. The GTAA provided requirement estimates for 2007-2017.***

***In the GTAA, the Coventry figure for 2007-2012 was negative (-4) because it assumed that a number of currently unusable pitches at the Siskin Lane site would be brought back into use following refurbishment. The negative figure was included in the Overview Report and in Appendix 2 of this report. It has been amended to zero in the table above as a more reasonable figure.***

These authorities are covered by the Black Country GTAA. This GTAA provides estimates for permanent pitch requirements for 2008-2013 and 2013-2018. The GTAA figures are used here on the assumption that they provide the best estimate for 2007-2017.

In the GTAA, the Sandwell figure for 2007-2012 was negative (-1) because it takes account of the proposed extension of the Brierley Lane site. The negative figure was included in the *Overview Report* and in Appendix 2 of this report. It has been amended to zero in the table as a more reasonable figure. The Dudley figure for 2012-2017 differs from that included in the *Overview Report* (Appendix 2 of this report) because the GTAA was revised in the interim.

#### **APPENDIX 4: LIST OF MAPS PRODUCED BY LAND USE CONSULTANTS**

1. Green Belt
2. Built-up Areas
3. Flood Risk Zone 2
4. Flood Risk Zone 3
5. Areas of Outstanding Natural Beauty
6. Sites of Special Scientific Interest
7. Special Areas of Conservation
8. Special Protection Areas
9. Ramsar Sites
10. Grade 1 Agricultural Land
11. National Nature Reserves
12. Ancient Woodland
13. National Parks
14. All Constraints
15. 60 minute public transport isochrone to Hospitals
16. 30 minute public transport isochrone to Primary Schools
17. 40 minute public transport isochrone to Regional Employment Land Sites
18. 40 minute public transport isochrone to Secondary Schools
19. 2017 Population Density
20. All isochrones with Motorways, A-roads and Primary Roads
21. Constraints and Opportunities

## APPENDIX 5: OPTION 2 SCENARIOS TESTED

The outcome of each scenario (as outlined in paragraph 32) is shown below together with a summary of changes from Option 1 at 'county' level and brief comments.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 2 Scenario A (75% Option 1; 25% constraints only)			
Local authority	Pitch requirements 2007-2017		Difference and Option 1 and Option 2A
	Option 1	Option 2A	
Shropshire	93	135	+42
Cannock Chase	35	26	-9
East Staffordshire	15	21	+6
Lichfield	11	13	+2
Newcastle-under-Lyme	20	18	-2
South Staffordshire	50	40	-10
Stafford	37	42	+5
Staffordshire Moorlands	2	7	+5
Tamworth	7	5	-2
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	22	-7
Rugby	66	54	-12
Stratford-on-Avon	45	54	+9
Warwick	13	12	-1
Bromsgrove	3	3	0
Malvern Hills	33	40	+7
Redditch	0	1	+1
Worcester	22	17	-5
Wychavon	66	64	-2
Wyre Forest	44	35	-9
Birmingham	19	15	-4
Coventry	3	3	0
Dudley	21	16	-5
Sandwell	3	3	0
Solihull	26	20	-6
Walsall	39	29	-10
Wolverhampton	36	27	-9
Herefordshire	109	136	+27
Stoke-on-Trent	40	31	-9
Telford & Wrekin	34	33	-1
West Midlands	939	939	0

This has the effect:

- Shropshire, Herefordshire and Telford & Wrekin gain 68 pitches
- Staffordshire and Stoke lose 14 pitches
- Warwickshire loses 12 pitches
- Worcestershire loses 8 pitches
- Conurbation loses 34 pitches

This hardly looks sustainable because of the extent of redistribution into the rural west. 8 local authorities still have requirements of fewer than 14 pitches and overall this group would be allocated only 5 more pitches than under Option 1.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 2 Scenario B (75% Option 1; 25% opportunity footprint on unconstrained land)				
Local authority	Pitch requirements 2007-2017		Difference and Option 2B	Option 1
	Option 1	Option 2B		
Shropshire	93	122	+29	
Cannock Chase	35	28	-7	
East Staffordshire	15	23	+8	
Lichfield	11	12	+1	
Newcastle-under-Lyme	20	20	0	
South Staffordshire	50	44	-6	
Stafford	37	42	+5	
Staffordshire Moorlands	2	7	+5	
Tamworth	7	6	-1	
North Warwickshire	18	16	-2	
Nuneaton & Bedworth	29	27	-2	
Rugby	66	55	-11	
Stratford-on-Avon	45	43	-2	
Warwick	13	15	+2	
Bromsgrove	3	4	+1	
Malvern Hills	33	34	+1	
Redditch	0	4	+4	
Worcester	22	19	-3	
Wychavon	66	70	+4	
Wyre Forest	44	35	-9	
Birmingham	19	16	-3	
Coventry	3	5	+2	
Dudley	21	17	-4	
Sandwell	3	3	0	
Solihull	26	23	-3	
Walsall	39	31	-8	
Wolverhampton	36	27	-9	
Herefordshire	109	109	0	
Stoke-on-Trent	40	36	-4	
Telford & Wrekin	34	46	+12	
West Midlands	939	939	0	

This has the effect:

- Shropshire, Herefordshire and Telford & Wrekin gain 41 pitches
- Staffordshire and Stoke gains 1 pitch
- Warwickshire loses 15 pitches
- Worcestershire loses 2 pitches
- Conurbation loses 25 pitches

This is less redistributive than Option 2 Scenario A but is still marked in its effect. 8 local authorities still have an allocation of fewer than 14 pitches, and this group is allocated 14 more pitches than under Option 1.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 2 Scenario C (75% Option 1; 25% opportunities)				
Local authority	Pitch requirements 2007-2017		Difference and Option 2C	Option1
	Option 1	Option 2C		
Shropshire	93	85	-8	
Cannock Chase	35	29	-6	
East Staffordshire	15	17	+2	
Lichfield	11	13	+2	
Newcastle-under-Lyme	20	20	0	
South Staffordshire	50	46	-4	
Stafford	37	34	-3	
Staffordshire Moorlands	2	6	+4	
Tamworth	7	8	+1	
North Warwickshire	18	16	-2	
Nuneaton & Bedworth	29	27	-2	
Rugby	66	54	-12	
Stratford-on-Avon	45	38	-7	
Warwick	13	18	+5	
Bromsgrove	3	8	+5	
Malvern Hills	33	27	-6	
Redditch	0	3	+3	
Worcester	22	21	-1	
Wychavon	66	56	-10	
Wyre Forest	44	37	-7	
Birmingham	19	50	+31	
Coventry	3	14	+11	
Dudley	21	27	+6	
Sandwell	3	14	+11	
Solihull	26	32	+6	
Walsall	39	41	+2	
Wolverhampton	36	36	0	
Herefordshire	109	91	-18	
Stoke-on-Trent	40	39	-1	
Telford & Wrekin	34	33	-1	
West Midlands	939	939	0	

This has the effect:

- Shropshire, Herefordshire and Telford & Wrekin lose 27 pitches
- Staffordshire loses 5 pitches
- Warwickshire loses 18 pitches
- Worcestershire loses 16 pitches
- Conurbation gains 67 pitches

Opportunities predominantly arise in the Conurbation and this is reflected in the pattern of gains and losses. Such large increases in pitch requirements in the conurbation seem neither sustainable nor realistic. Delivery would be very difficult and it is unlikely that the distribution would satisfy Gypsy and Traveller preferences.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 2 Scenario D (60% Option 1; 20% opportunities; 20% constraints)			
Local authority	Pitch requirements 2007-2017		Difference and Option 1 and Option 2D
	Option 1	Option 2D	
Shropshire	93	120	+27
Cannock Chase	35	23	-12
East Staffordshire	15	22	+7
Lichfield	11	14	+3
Newcastle-under-Lyme	20	18	-2
South Staffordshire	50	39	-11
Stafford	37	39	+2
Staffordshire Moorlands	2	9	+7
Tamworth	7	6	-1
North Warwickshire	18	15	-3
Nuneaton & Bedworth	29	22	-7
Rugby	66	47	-19
Stratford-on-Avon	45	47	+2
Warwick	13	16	+3
Bromsgrove	3	7	+4
Malvern Hills	33	34	+1
Redditch	0	3	+3
Worcester	22	17	-5
Wychavon	66	56	-10
Wyre Forest	44	31	-13
Birmingham	19	40	+21
Coventry	3	12	+9
Dudley	21	22	+1
Sandwell	3	12	+9
Solihull	26	26	0
Walsall	39	33	-6
Wolverhampton	36	29	-7
Herefordshire	109	116	+7
Stoke-on-Trent	40	32	-8
Telford & Wrekin	34	33	-1
West Midlands	939	939	0

This has the effect:

- Shropshire, Herefordshire and Telford & Wrekin gain 33 pitches
- Staffordshire loses 15 pitches
- Warwickshire loses 24 pitches
- Worcestershire loses 20 pitches
- Conurbation gains 27 pitches

Not surprisingly the pattern reflects both the conurbation gains from opportunities and the Shropshire/Herefordshire/Telford & Wrekin gains from extent of unconstrained land. There would be challenges to delivery and the lower level of requirements/provision in Staffordshire, Warwickshire and Worcestershire seems likely to frustrate Gypsy and Traveller preferences and could lead to unrealistic disruption of family links.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 2 Scenario E (50% Option 1; 50% opportunity footprint on unconstrained land)				
Local authority	Pitch requirements 2007-2017		Difference and Option 2E	Option 1
	Option 1	Option 2E		
Shropshire	93	150	+57	
Cannock Chase	35	22	-13	
East Staffordshire	15	31	+16	
Lichfield	11	12	+1	
Newcastle-under-Lyme	20	20	0	
South Staffordshire	50	37	-13	
Stafford	37	46	+9	
Staffordshire Moorlands	2	11	+9	
Tamworth	7	6	-1	
North Warwickshire	18	15	-3	
Nuneaton & Bedworth	29	25	-4	
Rugby	66	44	-22	
Stratford-on-Avon	45	40	-5	
Warwick	13	17	+4	
Bromsgrove	3	4	+1	
Malvern Hills	33	35	+2	
Redditch	0	8	+8	
Worcester	22	17	-5	
Wychavon	66	75	+9	
Wyre Forest	44	27	-17	
Birmingham	19	14	-5	
Coventry	3	7	+4	
Dudley	21	12	-9	
Sandwell	3	3	0	
Solihull	26	20	-6	
Walsall	39	24	-15	
Wolverhampton	36	18	-18	
Herefordshire	109	109	0	
Stoke-on-Trent	40	32	-8	
Telford & Wrekin	34	58	+24	
West Midlands	939	939	0	

This has the effect:

- Shropshire, Herefordshire and Telford & Wrekin gain 81 pitches
- Staffordshire remains unchanged
- Warwickshire loses 30 pitches
- Worcestershire loses 2 pitches
- Conurbation loses 49 pitches

This scenario would mean that 34% of additional pitches would be allocated to the rural west. Because of the nature of this area, this is unlikely to meet the needs of Gypsies and Travellers currently living in other parts of the Region. Similarly this scenario reduces the allocation to the Conurbation to an unrealistic extent.

## **APPENDIX 6: PITCH REQUIREMENT OUTCOMES FROM OPTION 3 SCENARIOS (OCTOBER 2008)**

The following table sets out the permanent pitch allocations at local authority level of different scenarios following the Option 3 principle of achieving a sustainable and realistic more even distribution of provision across the Region. All relate to the 5 year period 2007-2012 and an estimated base regional requirement of 660 pitches. The scenarios are described in paragraph 40.

**Alternative Scenarios for the Allocation of Additional Permanent Pitches 2007-2012 between Local Planning Authorities Following Option 3**

No.	Local authority	Base	Scenario A	Scenario B	Scenario C	Scenario D	Scenario E	Scenario F	Scenario G
1	Bridgnorth	5	23	19	10	10	5	5	5
2	North Shropshire	22	15	20	20	20	22	17	19
3	Oswestry	8	21	19	10	10	8	8	8
4	Shrewsbury & Atcham	10	22	19	10	10	10	12	11
5	South Shropshire	18	22	19	16	18	18	13	16
6	Cannock Chase	25	20	20	23	25	23	18	21
7	East Staffordshire	11	22	19	10	11	10	17	14
8	Lichfield	9	23	19	10	10	10	12	10
9	Newcastle-under-Lyme	15	21	19	14	15	14	13	14
10	South Staffordshire	32	15	20	29	29	29	19	26
11	Stafford	22	17	20	20	19	20	20	21
12	Staffs Moorlands	2	23	19	10	10	10	6	4
13	Tamworth	6	23	19	10	6	10	6	6
14	North Warwickshire & Nuneaton	12	22	19	11	12	11	9	10
15	Bedworth	20	18	19	18	20	18	20	20
16	Rugby	48	16	20	43	38	43	34	41
17	Stratford-on-Avon	34	19	20	31	27	31	22	28
18	Warwick	11	23	19	10	11	10	15	13
19	Bromsgrove	0	21	19	10	10	10	2	1
20	Malvern Hills	26	21	20	24	26	24	17	22
21	Redditch	0	23	19	10	10	10	6	3
22	Worcester	16	20	19	14	16	15	18	17
23	Wychavon	40	0	20	36	33	37	28	34
24	Wyre Forest	30	18	20	27	24	28	18	24

**Alternative Scenarios for the Allocation of Additional Permanent Pitches 2007-2012 between Local Planning Authorities Following Option 3 Continued**

No.	Local authority	Base	Scenario A	Scenario B	Scenario C	Scenario D	Scenario E	Scenario F	Scenario G
25	Birmingham	16	22	19	14	16	16	54	35
26	Coventry	0	22	19	10	10	0	30	15
27	Dudley	14	20	19	13	14	14	22	18
28	Sandwell	0	21	19	10	8	0	20	10
29	Solihull	17	20	19	15	17	17	15	16
30	Walsall	30	20	20	27	29	30	28	29
31	Wolverhampton	25	20	20	23	17	25	18	22
32	Herefordshire	83	11	20	74	83	83	57	70
33	Stoke-on-Trent	29	19	20	26	24	27	25	27
34	Telford & Wrekin	24	18	20	22	22	22	36	30

**APPENDIX 7: PITCH REQUIREMENT OUTCOMES FROM OPTION 3 SCENARIOS  
(DECEMBER 2008)**

Two Options were developed and presented to the RSS Gypsy and Traveller Reference Group in December 2008. They are based on Option 3 Scenarios E and G (see Appendix 6) amended to cover the 10 year period 2007-2017 and treating Shropshire as a single entity. They are described as Scenarios E<sup>10</sup> and G<sup>10</sup>. The pitch requirement outcomes are as follows.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario E <sup>10</sup>			
Local authority	Pitch requirements 2007-2017		Difference Option 1 and Option 3E <sup>10</sup>
	Option 1	Option 3E <sup>10</sup>	
Shropshire	93	93	0
Cannock Chase	35	32	-3
East Staffordshire	15	14	-1
Lichfield	11	14	+3
Newcastle-under-Lyme	20	18	-2
South Staffordshire	50	46	-4
Stafford	37	34	-3
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	27	-2
Rugby	66	60	-6
Stratford-on-Avon	45	41	-4
Warwick	13	14	+1
Bromsgrove	3	14	+11
Malvern Hills	33	30	-3
Redditch	0	14	+14
Worcester	22	20	-2
Wychavon	66	60	-6
Wyre Forest	44	40	-4
Birmingham	19	19	0
Coventry	3	3	0
Dudley	21	21	0
Sandwell	3	3	0
Solihull	26	26	0
Walsall	39	39	0
Wolverhampton	36	36	0
Herefordshire	109	109	0
Stoke-on-Trent	40	36	-4
Telford & Wrekin	34	31	-3
<b>West Midlands</b>	<b>939</b>	<b>939</b>	<b>0</b>

In terms of the broad geography of redistribution relative to Option 1 requirements:

- Shropshire, Herefordshire and the Conurbation authorities remain unchanged. Including Telford & Wrekin along with Shropshire would mean that the broad Shropshire area loses 3 pitches overall.
- Staffordshire and Stoke-on-Trent gain 5 pitches overall.
- Warwickshire loses 12 pitches overall.
- Worcestershire gains 10 pitches overall.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario G <sup>10</sup>			
Local authority	Pitch requirements 2007-2017		Difference
	Option 1	Option 3G <sup>10</sup>	Option 1 and Option 3G <sup>10</sup>
Shropshire	93	86	-7
Cannock Chase	35	30	-5
East Staffordshire	15	20	+5
Lichfield	11	13	+2
Newcastle-under-Lyme	20	19	-1
South Staffordshire	50	40	-10
Stafford	37	34	-3
Staffordshire Moorlands	2	5	+3
Tamworth	7	7	0
North Warwickshire	18	15	-3
Nuneaton & Bedworth	29	29	0
Rugby	66	57	-9
Stratford-on-Avon	45	37	-8
Warwick	13	17	+4
Bromsgrove	3	4	+1
Malvern Hills	33	28	-5
Redditch	0	4	+4
Worcester	22	23	+1
Wychavon	66	56	-10
Wyre Forest	44	35	-9
Birmingham	19	47	+28
Coventry	3	24	+21
Dudley	21	26	+5
Sandwell	3	16	+13
Solihull	26	25	-1
Walsall	39	38	-1
Wolverhampton	36	31	-5
Herefordshire	109	93	-16
Stoke-on-Trent	40	37	-3
Telford & Wrekin	34	43	+9
<b>West Midlands</b>	<b>939</b>	<b>939</b>	<b>0</b>

The resulting geographical pattern of differences from Option 1 is:

- Shropshire, Telford & Wrekin and Herefordshire lose 14 pitches overall.
- Staffordshire and Stoke-on-Trent lose 12 pitches overall.
- Warwickshire loses 16 pitches overall.
- Worcestershire loses 18 pitches overall.
- The Conurbation gains 60 pitches overall.

## APPENDIX 8: FURTHER FORMULATIONS FOR OPTION 3 (DECEMBER 2008)

Option 3 Scenario H follows the principles:

- There should be a minimum allocation of 14 pitches across the Region, regardless of the Section 4(4) Advice. Thus Coventry and Sandwell get an increased allocation.

- Apart from this, Section 4(4) Advice on meeting need where it arises is followed. Thus the remaining Conurbation authorities, Shropshire and Herefordshire retain their Option 1 requirements.

The diverted pitches to make up the minimum 14 pitch allocations come from the remaining authorities outside the Conurbation, Shropshire and Herefordshire, pro rata to need where it arises so that diversion is greatest from authorities with the highest Option 1 requirements.

<b>Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario H</b>			
Local authority	Pitch requirements 2007-2017		Difference and Option 3H
	Option 1	Option 3H	
Shropshire	93	93	0
Cannock Chase	35	31	-4
East Staffordshire	15	13	-2
Lichfield	11	14	+3
Newcastle-under-Lyme	20	17	-3
South Staffordshire	50	44	-6
Stafford	37	32	-5
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
North Warwickshire	18	16	-2
Nuneaton & Bedworth	29	25	-4
Rugby	66	60	-6
Stratford-on-Avon	45	38	-7
Warwick	13	14	+1
Bromsgrove	3	14	+11
Malvern Hills	33	29	-4
Redditch	0	14	+14
Worcester	22	19	-3
Wychavon	66	59	-7
Wyre Forest	44	37	-7
Birmingham	19	19	0
Coventry	3	3	0
Dudley	21	21	0
Sandwell	3	3	0
Solihull	26	26	0
Walsall	39	39	0
Wolverhampton	36	36	0
Herefordshire	109	109	0
Stoke-on-Trent	40	35	-5
Telford & Wrekin	34	29	-5
West Midlands	939	939	0

Option 3 Scenario I follows the principles:

- There should be a minimum allocation of 14 pitches across the Region.
- Section 4(4) Advice is essentially ignored and pitches to provide the minimum 14 pitch allocation are diverted from all authorities with an Option 1 requirement greater than 14 pitches pro rata to their share of the regional pitch requirement total so that diversion is greatest from the local authorities with the highest Option 1 requirement.

<b>Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario I</b>			
Local authority	Pitch requirements 2007-2017		Difference and Option 1 and Option 3I
	Option 1	Option 3I	
Shropshire	93	86	-7
Cannock Chase	35	32	-3
East Staffordshire	15	14	-1
Lichfield	11	14	+3
Newcastle-under-Lyme	20	19	-1
South Staffordshire	50	46	-4
Stafford	37	34	-3
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	27	-2
Rugby	66	61	-5
Stratford-on-Avon	45	41	-4
Warwick	13	14	+1
Bromsgrove	3	14	+11
Malvern Hills	33	30	-3
Redditch	0	14	+14
Worcester	22	20	-2
Wychavon	66	61	-5
Wyre Forest	44	41	-3
Birmingham	19	18	-1
Coventry	3	14	+11
Dudley	21	19	-2
Sandwell	3	14	+11
Solihull	26	24	-2
Walsall	39	36	-3
Wolverhampton	36	33	-3
Herefordshire	109	100	-9
Stoke-on-Trent	40	37	-3
Telford & Wrekin	34	31	-3
West Midlands	939	939	0

## APPENDIX 9: FURTHER FORMULATION FOR OPTION 3 (MARCH 2009)

Option 3 Scenario J follows the principles:

- There should be a minimum allocation of 20 pitches across the Region.
- Section 4(4) Advice is essentially ignored and pitches to provide the minimum 20 pitch allocation are diverted from all authorities with an Option 1 requirement greater than 20 pitches pro rata to their share of the regional pitch requirement total so that diversion is greatest from the local authorities with the highest Option 1 requirement.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario J				
Local authority	Pitch requirements 2007-2017		Difference and Option 3J	Option 1
	Option 1	Option 3J		
Shropshire	93	78	-15	
Cannock Chase	35	29	-6	
East Staffordshire	15	20	+5	
Lichfield	11	20	+9	
Newcastle-under-Lyme	20	20	0	
South Staffordshire	50	42	-8	
Stafford	37	31	-6	
Staffordshire Moorlands	2	20	+18	
Tamworth	7	20	+13	
North Warwickshire	18	20	-2	
Nuneaton & Bedworth	29	24	-5	
Rugby	66	55	-11	
Stratford-on-Avon	45	38	-7	
Warwick	13	20	+7	
Bromsgrove	3	20	+17	
Malvern Hills	33	28	-5	
Redditch	0	20	+20	
Worcester	22	22	0	
Wychavon	66	55	-11	
Wyre Forest	44	37	-7	
Birmingham	19	20	+1	
Coventry	3	20	+17	
Dudley	21	20	-1	
Sandwell	3	20	+17	
Solihull	26	22	-4	
Walsall	39	36	-3	
Wolverhampton	36	30	-6	
Herefordshire	109	91	-18	
Stoke-on-Trent	40	34	-6	
Telford & Wrekin	34	29	-5	
West Midlands	939	939	0	

**APPENDIX 10: NOTE ON OPTIONS FOR ALLOCATION OF PLOTS FOR TRAVELLING SHOWPEOPLE (JANUARY 2009)**

<b>Distribution of Additional Plot Requirements for Travelling Showpeople : 2007-2012</b>			
County	Option 1	Option 2a	Option 2b
Shropshire/Herefordshire/ Telford & Wrekin	9	19	24
Staffordshire/Stoke on Trent	23	23	23
Warwickshire	1	12	17
Worcestershire	22	22	22
West Midlands Conurbation	63	42	32
<b>Region</b>	<b>118</b>	<b>118</b>	<b>118</b>

**Option 1:** Requirements as identified in the GTAAAs with the following assumptions:

- Requirements in the South HMA and Southern Staffordshire/Northern Warwickshire sub-regional GTAAAs have been split between counties according to the local authority requirements in the GTAAAs.
- The Birmingham/Coventry/Solihull GTAA site re-location is assumed to involve 25 existing plots + 5 additional plots for family growth.

This Option reflects 'need where it arises'. Over half (53%) of additional plot requirements arise in the West Midlands Conurbation.

**Option 2:** Aims to create a wider spread of opportunities for site development for Travelling Showpeople, while reducing the concentration of requirements within the conurbation evident on the 'need where it arises' basis. The process of redistribution is pragmatic and is aimed to achieve, at county level, the potential to develop a sustainable multi-plot site in each county area. Options 2a and 2b make the calculation in different ways. In both instances, 'need where it arises' requirements in Staffordshire and Worcestershire are retained as they already provide reasonable development opportunities. Some of the additional plot requirements from the Conurbation are 'diverted' into Shropshire/Herefordshire/Telford & Wrekin and Warwickshire as follows:

**Option 2a:** Diverts one-third of Conurbation plot requirements (21 plots) with a broadly even distribution between Shropshire etc (10 plots) and Warwickshire (11 plots). These additional diverted plots are added to the 'need where it arises' plots from Option 1.

**Option 2b:** Diverts half of the Conurbation plot requirements (31 plots) with a broadly even distribution between Shropshire etc (15 plots) and Warwickshire (16 plots). These additional diverted plots are added to the 'need where it arises' plots from Option 1.

## Appendix 11

### Justification for 14 Pitches Minimum and 42 Pitch Maximum Allocations

In Consultation Option 3, a minimum 14 pitch allocations for each local authority was adopted to achieve redistribution to increase choice for Gypsies and Travellers and to increase deliverability by spreading responsibility for provision more widely between local authorities. This followed the approach adopted by the East of England Regional Assembly in its Preferred Option for its Single Issue Review where a minimum of 15 pitches was adopted. In the West Midlands the pitch number was amended downwards by one pitch because overall requirements are lower than in the East of England.

The East of England approach, including the minimum pitch allocation, was thoroughly tested at Examination in Public and was broadly endorsed in the Panel Report, and in the Secretary of State's Proposed Changes, and finally in the revision to the East of England Plan.

Justification for setting a pitch minimum at about this level comes from the CLG report *Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies* (2007), page 52 which refers to alternative means of dispersing requirements between areas of high and low need:

'Again, there is unlikely to be evidence unless it is provided in GTAs (and some have attempted to discover locational preferences) and/or advice from local authorities. We think that:

- EITHER dispersion should be relatively modest in terms of distance and extent. For example, where an LPA with high need generated by current provision adjoins one with no site provision, some of the requirements might be 'diverted' to the adjoining area, especially if road links between the areas are good. This would enable existing community and family links to be maintained. Such possibilities might be identified from the maps at Q2.
- OR new areas of site provision should be positively planned, and should be sufficiently extensive to create a viable local community. A 'viable' community should probably be at least 15 pitches with the possibility of extension to accommodate extended family members and family growth in the future, and should be well supported. Planned 'new' communities should, of course, meet other positive criteria for sites including especially employment opportunities and good road access.'

Justification of the 14/15 pitch minimum is in the second bullet. It is clear that this is intended as a viable community, but could include either a single site or several smaller sites. The approach now adopted in the West Midlands essentially seeks to combine both aspects suggested by the CLG report.

### Justification for 42 Pitches Maximum Allocation

In allocating additional pitch requirements, factors relating to equity and the practicalities of delivering high numbers of new pitches were considered and it is therefore proposed that no authority should be expected to provide more than 3 times the minimum allocation (i.e. 14 pitches X 3 = 42 pitches). In effect, this capping of allocations allows recognition to be given to those authorities which have made a significant degree of provision to date, in comparison to authorities which have made limited provision.

## Appendix 12

### Basic Information on Provision, Requirements and Capacity

No.	Local authority	Current provision	Draft 2 requirement	NWIA	Opportunity footprint on unconstrained land	Exporter/importer under Draft 2
1	Cannock Chase	41	35	35	175	Neutral
2	East Staffordshire	17	15	15	995	Neutral
3	Lichfield	2	14	11	274	Importer
4	Newcastle-under-Lyme	17	20	20	426	Neutral
5	South Staffordshire	83	42	50	509	Exporter
6	Stafford	71	37	37	1,157	Neutral
7	Staffordshire Moorlands	1	2	2	415	Neutral
8	Stoke-on-Trent	50	40	40	491	Neutral
9	Tamworth	0	10	7	86	Importer
10	North Warwickshire	21	16	10	229	Importer
11	Nuneaton & Bedworth	36	29	29	441	Neutral
12	Rugby	66	42	66	437	Exporter
13	Stratford-on-Avon	36	42	52	748	Exporter
14	Warwick	0	23	13	429	Importer
15	Bromsgrove	18	14	3	104	Importer
16	Malvern Hills	20	33	33	779	Neutral
17	Redditch	0	14	0	326	Importer
18	Worcester	20	22	22	243	Neutral
19	Wychavon	123	42	66	1,742	Exporter
20	Wyre Forest	59	42	44	206	Exporter
21	Birmingham	10	19	19	168	Neutral
22	Coventry	20	15	3	239	Importer
23	Dudley	27	23	21	81	Importer
24	Sandwell	15	5	3	51	Importer
25	Solihull	37	28	26	295	Importer
26	Walsall	20	39	39	179	Neutral
27	Wolverhampton	40	36	36	16	Neutral
28	Herefordshire	81	109	109	2,260	Neutral
29	Shropshire	124	93	93	4,312	Neutral
30	Telford & Wrekin	39	37	34	1,701	Importer
	<b>West Midlands Region</b>	<b>1,094</b>	<b>938</b>	<b>938</b>	<b>19,515</b>	<b>Neutral</b>

**Appendix 13**

**Summary of Responses Received to January – February 2010 Consultation  
With Local Authorities and Gypsy & Traveller RSS Reference Group**

<b>Local Authority</b>	<b>Date</b>	<b>Summary of Responses</b>	<b>Comments</b>
North Warwickshire BC	10 January 2010	Question why there is a need to re-distribute pitches from Rugby BC – ‘a distant local authority’. No evidence on how this re-distribution of pitches from one local authority to another will work.	Need to apply a Strategic view on meeting needs. GTAA undertaken on the A5 corridor so N. Warwickshire is not so ‘distant’. Policy Statement is not re-distributing pitches, it is addressing a Regional and sub regional backlog of unmet need.
Coventry City Council	8 January 2010  16/02/2010	<p>Preferred approach Option 1: need where it arises. Argues that the proposals are not,</p> <ul style="list-style-type: none"> <li>• fully justified,</li> <li>• undertaken correctly nor</li> <li>• in accordance with the CLG guidance.</li> </ul> <p>Argues - use of a maximum figure of 42 pitch limit contrary to Cir 01/06.</p> <p>Primary concern - the use of 14 and 42 pitches as figures for allocating provision, and the redistribution of pitches accordingly. Both figures remain arbitrary Argues these recommendations apply as much to the overall pitch requirement as they do to site specifics consider redistribution.</p> <p>Fails to correctly follow the stages recommended in the CLG guidance for allocating pitch requirements (2007). Argues that the GTAAAs remain the only robust evidence base to support LDDs until more detailed studies can be undertaken across the region.</p>	<p>CLG expects RPBs should, when taking a strategic view of regional needs, give more weight to pitch allocations between LPAs in GTAAAs which take into account factors other than solely the pattern of need as it arises. The strategic pitch allocation process provides an opportunity to achieve a wider spread of authorised site provision. (CLG, 2007)</p> <p>CLG is unable to give clear guidance on the degree of redistribution or the numbers that might be involved but CLG notes RPBs will probably be forced to make some form of assumptions.</p> <p>A ‘viable’ community should probably be at least 15 pitches sites can be successfully located within existing settlements and there is no reason to avoid LPAs on ‘land shortage’ grounds where land is available for residential development. (This is a point other LA.s also</p>

		<p>Argues it should be the responsibility of the Local Authority that feels its figure is too high to approach neighboring authorities to negotiate the redistribution of need, not the other way around.</p> <p>This approach in addition to the new Para 9.26, to allow localised flexibility where opportunities arise, would conform to national guidance, would be based on a sound evidence base, and would be justified.</p> <p>Concludes - Draft Policy Statement is unsound, unjustified and continues to lack conformity with national guidance.</p>	<p>need to consider again.)</p> <p>Coventry is asked to support other LA.s in its corner of the Region and in the spirit of its traditional sub regional working which is being used to meet its traditional housing needs and growth requirements.</p> <p>Rugby has a very high local need and surrounding authorities are asked to support Rugby.</p> <p>Sustainability has drawn on a reasonable and small set of assumptions based on practice from other parts of the country where the ideas have been subject to an EiP. It is acknowledged that there is a degree of arbitrariness but the principles have been applied consistently but not slavishly or with an inappropriate mechanistic determination.</p> <p>RPB has to take a strategic view, not just a GTAA view. Coventry wants Rugby to take the lead but the role for addressing this is a Regional one in the first instance and remains so under the new Regional Strategy. The RPB has asked LA.s to respond with alternative distributions and this has not been forthcoming.</p> <p>Coventry attach undue weight to the CLG publication which is neither regulation nor formal guidance nor even established best practice. It is the output of the research; a 'tool'</p>
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			<p>which can be used by RPBs in their task of estimating regional pitch requirements and generating options for allocating this requirement between LPAs.</p> <p>This report presents the results of research commissioned to support RPBs &amp; represents an interim measure.</p>
Nuneaton & Bedworth Borough Council	18 02 2010	<p>Does not support the findings of the GTAA and opposes the proposals contained within it.</p> <p>Wishes to continue to question the weight that should be given to the Policy Statement in LDF, examinations and planning enquiries.</p>	<p>The GTAA is the LA.s evidence. No alternative provided.</p> <p>GOWM letter is clear.</p>
Warwick	18 02 2010	<p>Does not support the findings of the GTAA and opposes the proposals contained within it.</p> <p>Wishes to continue to question the weight that should be given to the Policy Statement in LDF, examinations and planning enquiries.</p>	<p>GTAA was over a shorter time base than the others so when benchmarked against the other GTAA's Warwick's figure was increased slightly to adjust and standardise against the other GTAA's for the full 10 year period.</p> <p>The partial redistributive approach is justified strategic response. GTAA's are not the only factor shaping pitch policy allocation.</p> <p>Across the region, the 68 redistributed pitches represent 7% of total requirements. They represent 24% of NWIA requirements in the 'exporting' LAs.</p> <p>No consensus among LA.s noted</p>
CEPOG Seven Metropolitan Authorities	18 02 2010	Table 2, sets out 'indicative' requirements for the period 2017 – 2027, this is not supported by the seven Metropolitan Authorities	GOWM requires and Planning Coordination group negotiated this 'indicative' requirement rather than a statutory

			one. The Draft Policy also looks for a GTAA review on later than 2015.
Birmingham City Council	19 02 2010	<p>Table 2, sets out 'indicative' requirements for the period 2017 – 2027, this is not supported potentially prejudges the 2015 review &amp; may be enforcement issues should illegal encampments materialise over and above provision identified in current GTAAAs prior to 2017.</p> <p>Convey this view to the decision-making meetings that will be considering this report including the Regional Planning Executive on 23 February 2010 and the Assembly Board and Joint Strategy and Investment Board meetings in March.</p>	GOWM requires provision to be shown post 2017, but this is only indicative and subject to a further GTAA review.
Solihull MBC	19 02 2010	<p>Very disappointed at redistribution mechanism (pitch trade-offs) which, in Solihull's case, lacks appropriate and clear justification, and which undermines the robust evidence based approach of the GTAA process.</p> <p>It cannot be said that Solihull has not made a significant degree of provision to date; neither does the GTAA identify low future pitch requirements to warrant an increase in provision pitch requirements beyond 2017.</p>	<p>The slightly redistributive approach following the need to take a strategic not solely GTAA based view is not accounted for in this response, nor is an alternative offered. Also note that the figure for 2007-2017 has only increased by 2 households.</p> <p>Acknowledge Solihull's provision.</p> <p>GOWM requires provision to be shown post 2017, but this is only indicative and subject to a further GTAA review.</p>
Dudley MBC	19 02 2010	<p>Serious concerns and opposition - Relates to Core Strategy now underway.</p> <p><u>Requirements for the period 2017 – 2027</u>, This is not supported potentially prejudges the 2015 review &amp; may be enforcement issues</p>	<p>This ignores the fact that a Regional Strategy has to be produced. No alternative distribution offered. Planning policy production does not stand still waiting for other scales of strategy and process to synchronise.</p> <p>GTAAAs were never going to be the only</p>

			issue CLG requires a Strategic view to be taken.
Sandwell	18 <sup>th</sup> February 2010	Sandwell only have room for 1 more pitch if it is publicly funded. A second scheme also requires funding.  the time period sets targets to 2017 not that of the GTAA and are worried any extra pitches will not be funded.	Need to apply a Strategic view on meeting needs. CLG Guidance is that land is not restricted if it is available for housing. It is no part of this policy or that of Government that all pitches should be all, or even mainly publically funded. Private planning applications and site purchased and development should be included in the pitch provision.
Wolverhampton	22/02/2010	Our position will be that numbers should be determined locally	Need to apply a Strategic view on meeting needs
Telford & Wrekin Council,	19 February 2010	Strongly objects to requirement divergent from the position based on locally evidenced need emphasised within the Council's GTAA  A recurring theme through sub-regional working has been a need to seek the involvement and guidance of organisations such as the Police and Fire Service in site delivery and design, reference to this aspect would be welcomed.	Need to apply a Strategic view on meeting needs.  Agree to include a permissive policy wording but not mandatory.
Stratford upon Avon	18 02 2010	Support 2007 -2017 Not support 2017 – 27 but agrees 2015 review of GTAA	Acknowledged GOWM require this and the approach has been consistent for all and subject to a GTAA refresh by 2015.
Redditch Borough	17 02 2010	Council requests further clarification of the status of these statements to establish clearly their role in the process of planning policy preparation and the weight afforded to them when formulating Development Management decisions.  1 pitch from Stratford – On – Avon and 13 pitches from Wychavon. inappropriate and	Status is as expressed by GOWM letter to WMRA 8 Oct 2009.  14 pitches is the interim policy sustainable community assumption. Redditch is being asked to take some of the pressure from neighbouring

		<p>unsustainable</p> <p>Joint working would be appropriate to provide Transit sites where necessary,</p> <p><b>Travelling Showpeople:</b> Draft Interim Policy Statement proposes 22 plots for Worcestershire and Redditch Borough Council would question the credibility of this evidence.</p>	<p>authorities. Support this approach</p> <p>The basis for the proposals come from the Local Authorities' GTAAAs and in consultation with the Showmans' Guild.</p>
Wychavon District Council	18 02 2010	<p>Support the 2007 - 2017 pitch allocation. 2017 + @3% too high</p> <p>Transit 20 too high</p>	<p>Acknowledged GOWM require this and the approach has been consistent for all and subject to a GTAA refresh by 2015. Consistent with similar LA.s and GTAA</p>
Wyre Forest District Council	18/02/10	<p>Principle of the policy statement is welcomed</p> <p>15 additional - 2017-22 and 17 pitches for the period 2022-27. - additional requirements excessive. Authorities who have historically provided a higher number of permanent pitches would again have to do so over the next phased period based on the assumption of anticipated household growth at an annual 3% compound increase. Extremely difficult to accommodate this level of pitch provision within sustainable locations.</p>	<p>Acknowledged GOWM require this and the approach has been consistent for all and subject to a GTAA refresh by 2015.</p>
Stoke-on-Trent City Council	23 Feb 2010	<p>Accords with .... the Newcastle-under-Lyme and Stoke-on-Trent adopted Core Spatial Strategy. No objections to the proposed pitches allocation. Support Policy 2 - a co-ordinated review of sub-regional GTAA's should be undertaken no later than 2015. Support Policy 3- transit pitches and Policy 6 for supporting travelling Showpeople.</p>	<p>Welcome the support for a redistributive approach.</p>
Stafford	25 Feb 2010	<p>Do not agree with the requirements and oppose the</p>	<p>The GTAA is well researched evidence of</p>

	<p>provision shown. GTAA research outcome is a projection not evidence of actual demand.</p> <p>Concerns are expressed over the inflated levels of provision forecast as a consequence of over ambitious aspirations by respondents and that it is unrealistic to assume that these levels are deliverable.</p> <p>Proportion of new sites expected to be provided by the public sector and the travelling communities has not been addressed.</p> <p>Considered that adequate provision has already been made in the Borough for existing and future requirements and additional sites are not needed - as proven by the lack of applications over the last few years.</p> <p>There should be a more even distribution of total overall provision between Councils to move a fairer proportion of provision to Authorities having disproportionately fewer pitches at present.</p> <p>Additional pitches in Stafford Borough should be reduced to zero.</p> <p>Should more appropriately be addressed in Phase 3 of the RSS</p> <p>No opportunity is given for representations opposing the policy to be heard by an Inspector</p>	<p>the backlog, and is not a projection.</p> <p>The GTAAAs were benchmarked for consistency and are not inflated by 'over ambitious aspirations'. Delivery is not unrealistic. It is partly a function of the LDF identifying sufficient well located sites and the Council facilitating their positive and harmonious integration into the existing communities.</p> <p>The backlog is not about whether it is to be met by either public or private funds. Public funding was never intended to meet the whole need.</p> <p>The GTAA evidence is otherwise. The Authority can argue its case at the LDF EIP.</p> <p>Welcome the support for a redistributive approach.</p> <p>Argue that the strategic view taken does commence a redistributive approach, but this cannot be developed further given the lack of consensus.</p> <p>All areas are asked to play their part in meeting needs. Reducing one LA. area to zero would be unnecessarily contentious, put pressure on other authorities and deny Gypsies and Travellers the opportunity to meet the shortfall of provision in and near accesses to work and services in this authority area.</p>
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			<p>The recent legislation has brought the former planning system to an end.</p> <p>We look forward to these proposals for Gypsies and Traveller provision being heard at EIP under the new Regional Strategy process.</p>
Staffordshire Moorlands DC	19 02 2010	Broadly supportive	
Lichfield	16 02 2010	<p>Strongly objects - Doesn't agree with increases from South Staffordshire Council Green belt a constraint</p> <p>How will this be done?</p>	<p>Need to apply a Strategic view on meeting needs</p> <p>No redistribution alternative suggested.</p> <p>Green Belt is not in itself a reason for not meeting needs.</p> <p>Make provision in LDF and Planning applications on sites identified – as with housing sites. This is not about funding or any one specific ownership or tenure.</p>
Tamworth	18 February 2010 Also 7 Jan 2010	<p>Doesn't agree with increases from Rugby</p> <p>Wants GTAA only – has Green Belt and limited land</p> <p>Would prefer to see Lichfield Tamworth and N Warwickshire do cross boundary working 'make it a requirement'</p>	<p>Need to apply a Strategic view on meeting needs</p> <p>GTAA undertaken on the A5 corridor.</p> <p>Green Belt is not in itself a reason for not meeting needs.</p> <p>Would support a joint Gypsy and Traveller Development Plan Document.</p>
Cannock Chase DC	8 02 2010	<p>Due to green belt and AONB want a significant reduction</p> <p>GTAAs criticised for being 'aspirational'.</p> <p>Travelling Showpeople not robust as only to 2012</p>	<p>Cannock Chase DC doesn't say who should take the pitches</p> <p>This time period is the limit of sensible forward assessment of needs</p>
South Staffordshire Council	15 Feb 2009	<p>Re-enforcing the existing patterns of provision.</p> <p>Giving no serious consideration to the re-distribution of future pitch provision into those parts of the Region where current provision is modest or low.</p>	<p>Welcome the support for a redistributive approach.</p> <p>Argue that the strategic view taken does commence a redistributive approach, but this cannot be developed further given the lack of consensus.</p>

Herefordshire	16 Feb 2010	<p>Transit pitches – question the need for 10</p> <p>Want criteria based policies not site allocations due to fragmented living style.</p>	<b>Agree to reduce to 5.</b>
Irish Traveller Movement in Britain (ITMB)	18 February 2010	<p>Some of draft policy not to be based on a strong foundation of the realities of the Gypsy and Traveller lives.</p> <p>Government required all local authorities 'to increase significantly' Gypsy and Traveller sites. The Draft Policy could go much further.</p> <p>Response encourages more content on best practices in order to properly develop and manage sites.</p> <p>ITMB point out- Race Relations Act (1976, amended 2000) general duty that public authorities must have 'due regard to the need':-</p> <ul style="list-style-type: none"> <li>• To eliminate unlawful racial discrimination;</li> <li>• To promote equality of opportunity;</li> <li>• To promote good relations between persons of different racial groups.</li> </ul> <p>ITMB, want the Draft Policy to do more to energetically pursue these.</p> <p>ITMB supports the redistributive approach to deal with the currently uneven distribution across the region.</p> <p>We strongly note that the numbers of pitches are a conservative and <u>minimum</u> estimate and that there should certainly not be any further revisions that reduce this target and in fact the number should be increased.</p> <p>Want to facilitate greater engagement and involvement by-</p> <p>1 Capacity Development of Gypsy and Traveller individuals and</p>	<p>This is about addressing unmet need not current fragmented living.</p> <p>The respondent appears to be asking more of this Draft Policy statement than it is designed or intended to deliver. We have taken independent expert advice, the advice of traveller representatives and the Gypsy and Traveller Reference Group.</p> <p>The respondent appears to be asking more of this Draft Policy statement than it is designed or intended to deliver.</p> <p>Welcome the support for a redistributive approach.</p> <p>These aspects are covered as far as is appropriate in the Draft Policy – capacity building and development of dialogue and structures for engagement</p>

		<p>organisations</p> <p>2 The development of authorities' awareness of Gypsy and Traveller related issues</p> <p>3 The establishment of forums and networks that provide a safe official space for dialogue to occur.</p>	
Campaign to Protect Rural England	18 02 2010	<p>Welcome the inclusion of significant environmental assets in the determination of sites at LDF level [Policy 4].</p> <p>Welcome the addition of longer term figures for gypsy and traveller sites in Table 2. We would prefer these to be mandatory but believe even indicative figures are better than nothing.</p>	Acknowledged.

This document forms part of a suite of material:

1. West Midlands Regional Spatial Strategy – Interim Policy Statements and Policy Recommendations
- 2. Background Paper - Interim Policy Statement relating to Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople**
3. Background Paper - Interim Policy Statement for Construction Aggregates
4. Background Paper - Policy Recommendation for Rural Services
5. Background Paper - Policy Recommendations for Culture, Sport and Tourism
6. Background Paper - Policy Recommendations for Quality of the Environment
7. Background Paper - Policy Recommendations for Minerals

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