



PARTIAL REVIEW OF REGIONAL  
SPATIAL STRATEGY (RSS) –

Consultation on Interim Draft Policies: Travelling  
Showpeople  
January – 27 March 2009

(Responses by Question)

## **North West Regional Assembly**

### **PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –** Consultation on Interim Draft Policies: Travelling Showpeople

A consultation report from

#### **CAG Consultants**

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

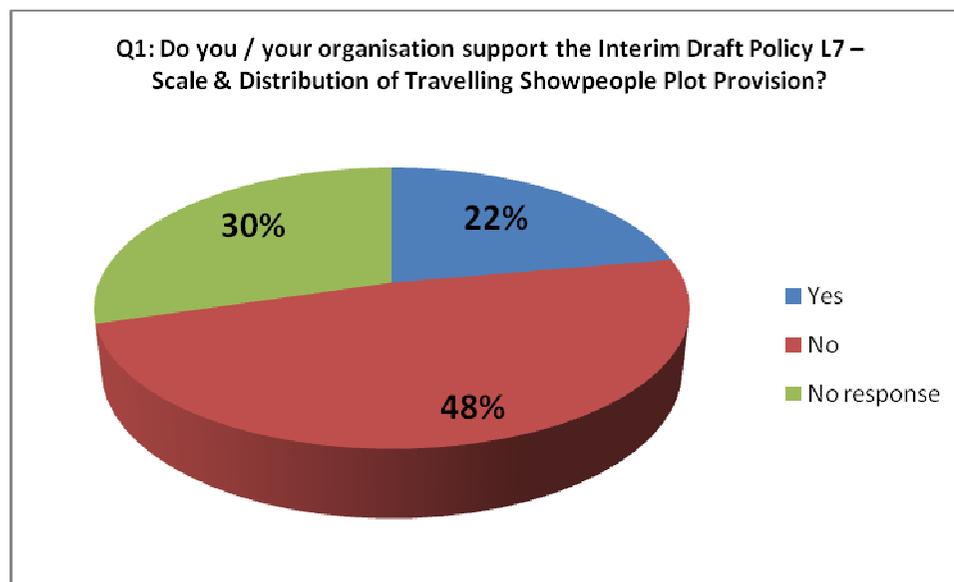
March 2009

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## 1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?



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

The table below shows the verbatim comments received.

Organisation:	1. Do you / your organisation support the Interim Draft Policy L7 – Scale & Distribution of Travelling Showpeople Plot Provision?	2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)
AGMA	-	"3.0 Travelling Showpeople (Policy L7) 3.1 The GM GTAA focussed solely on need for Travelling Showpeople within the sub-

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		<p>region and identified a number of critical issues including the size and numbers of pitches currently provided. However, given the sample size and the fact that the study was only based on the sub-region, the GM GTAA was unable to take account of the preferences of Travelling Showpeople.</p> <p>3.2 Therefore, whilst the GM GTAA forms an important part of the evidence base, this work needs to be considered alongside other areas of research, including the work carried out by the Showmen’s Guild Lancashire and Cheshire Sections – The North West’s Travelling Showpeople’s Current Base Location, Preferred Base Locations and Operating Patterns. This study identified the preferences of Travelling Showpeople across the North West, which 4NW has taken account of in the Draft Policy L7."</p>
Allerdale Borough Council	No	We endorse the comments of Cumbria County Council, and have concerns similar to those we have on Policy L6 (G & Ts) and for the same reasons.
Blackpool Council	Yes	It seeks a fair and equitable distribution on future increases in provision across the Region, related to where Travelling Showpeople currently live and work.
Cheshire East Council	Yes	-
Cheshire West and Chester Council	No	-
Chorley Borough Council	-	1. Chorley Council supports the principle of Interim Draft Policy L7. However, we object to the Travelling Showpeople plot provision identified for the Borough.
CPRE North West	No	<p>Overall we support the policy, subject to the following amendments:-</p> <p>1. The policy should also refer to policy DP9. Mitigation of &amp; adaptation to climate change applies to all policy areas, eg locating Travelling Showpeople’s sites should take account of reducing emissions from travel, particularly in light of the long distances they currently unnecessarily have to travel; design should include consideration of shading from trees, permeability of surfaces, increased future flood risk etc. If individual policies are to be picked out for cross-referencing, the environmental protection provisions of policy EM1 should also be included.</p>

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		<p>2. The reference to rural exception sites is sensible. However, the reference to amending Green Belt boundaries in policy is neither necessary nor desirable. LAs could do this if necessary without being told in RSS that they can, and shouldn't be encouraged to do so unless there is no other option. Para 11 provides sufficient guidance. Otherwise GB policy may be seen to be undermined.</p> <p>The policy as it stands actively promotes considering the provision of sites in the Green Belt, whereas para 11 much more closely reflects the provisions of RDF4 and PPG2. Either the reference to Green Belt in the policy should be removed, or replaced with the following sentences from para 11: "All other alternatives should be explored before Green Belt locations are considered. If there is an identified need for a Gypsy and Traveller site in an area and no suitable sites outside the Green Belt boundary exist, in exceptional circumstances, limited alterations or sites inset in the Green Belt could be considered. Such proposals should be brought forward through the plan making process and specifically allocated as a Travelling Showpeople site only."</p>
Cumbria County Council.	-	<p>1.1 As with draft Policy L6, the idea of refining the existing Gypsy and Traveller Accommodation Assessment (GTAA) approach to the provision of new Travelling Showpeople sites in Policy L7, by distributing them according to the needs of that community is considered to a good one. However, the methodology adopted by 4NW in this case is not sufficiently transparent, nor does it appear robust.</p> <p>1.2 It is therefore of concern that Table 7.3 and Interim Policy L7 indicates for Cumbria: a current authorized provision in 2007 of 50 plots. a minimum additional requirement of 20 plots between 2007- 2016; and a total proposed provision of 70 plots at 2016.</p> <p>1.3 These figures are significantly higher than the Cumbria GTAA, which shows: a current authorised provision in 2007 of 33 plots a minimum additional requirement of 18 plots between 2007 - 2016; and a total proposed provision of 56 plots at 2016</p> <p>1.4 It would seem that the bulk of the discrepancy in the figures lies in the calculation of the current authorised provision; there is a need to agree current authorised position as there are significant discrepancies.</p> <p>1.5 The apparent justification for the proposed increase in the level of provision for</p>

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		<p>Cumbria (Table 7.3) comes from the analysis contained in the 'North West's Travelling People's Current Base Location, Preferred Base Locations and Operating Pattern', prepared for 4NW and based on data collected in Autumn 2007. This document highlights the fact that a survey of Travelling Showpeople indicated that within Cumbria, only Allerdale hosts any Showmen in Cumbria as a base for 2 families (out of 110 families in the North West). This represents 1.82% (7.5 out of 352.71) of the single preferred permanent base location had identified 'anywhere in Cumbria'. In terms of multiple locations, no specific district was identified in Cumbria, although just 1.7% (9 out of 525) of the number of preferences identified 'Cumbria ' as a preferred base.</p> <p>1.6 In terms of existing locations in Cumbria, only Allerdale was identified as having a base for a small number of Travelling Showpeople in March. As the show year progresses during April - June, more Travelling Showpeople seem to operate in Cumbria than in the previous months, specifically within Eden District and South Lakeland. However, by July, Cumbria would appear to have no Show/Fairs operated by the North West's Travelling Showpeople. In August, there is evidence of some Travelling Showpeople in South Lakeland, but by October, at the season end, there appear to be no Travelling Showpeople operating in the sub-region at that time.</p> <p>1.7 Having taken account of the aforementioned survey, the proposed scale and distribution of Travelling Showpeople plot provision shown in Table 7.3 does not adequately reflect both current authorised provision, and also likely future use. It would seem that additional provision is proposed in Eden or Barrow, despite those being locations used by Travelling Showpeople during June and August respectively.</p> <p>1.8 As with proposed Polic L6, the proposal for a 3% compound increase in the level of overall provision between 2016 and 2021 does not seem to be based on sound evidence, and not in accordance with guidance in PPS3 - Housing . Instead, as with our suggestions above, it is recommended that a review of needs should take place at that point to justify further provision.</p> <p>1.9 The reference to the provision of temporary accommodation linked to festivals should be included in the text rather than policy. 1.10 As with draft Policy L6, the reference to the use of an exceptions site policy is considered inappropriate in this</p>

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		policy context.
Director of Development Preston City Council	No	<p>"Central Lancashire Authorities Response to 4NW Accommodation for Travelling Showpeople: Interim Draft Policy L7- Scale and Distribution of Travelling Showpeople Plot Provision Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L7 and recognise the need to provide additional plots for Travelling Showpeople in the region. However the Central Lancashire authorities do object to the Travelling Showpeople Plot Provision identified for each authority."</p>
Fylde Borough Council	-	<p>The Council has no comment on the Draft Policy since we have seen no numerical evidence to support or object to the regional figures contained in the draft policy</p>
GONW	No	<p>"Whilst GONW generally support the policy we have the following concerns</p> <p>a. A key concern is that need can be met within the region and there are concerns that whilst GONW supported the option for a more equitable distribution of pitch numbers based on need and the requirements of Travelling Showpeople, it is not clear firstly how the current distribution has been achieved and whether it results in a more equitable distribution</p> <p>b. There needs to be a clear, robust and transparent evidence base in order that the overall numbers of pitches can be defended at EiP. There are concerns that currently the evidence base is not robust and this may lead to pitch numbers being reduced through local challenges, leading to insufficient pitches being available overall for the region</p> <p>c. In specific terms the introductory text could provide an overarching introduction to both the Gypsy and Traveller and Travelling show people sections without the need for its wholesale repetition</p> <p>d. In relation to paragraph 2 of the introductory text suggest the addition of "mixed" in relation to inclusive communities and also in relation to "principles of sustainable development" consider the addition of text " where they have access to</p>

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		<p>facilities and services”</p> <p>e. The 2nd paragraph refers to a coordinated review of Gypsy and Traveller Accommodation Assessments, but given the definition of Gypsy and Travellers this would exclude travelling show people and therefore is not relevant in this policy. Need to reference the appropriate assessments for Travelling Showpeople.</p> <p>f. suggested rewording of 5th paragraph “Sites should be identified having regard to circular 01/06 and PPS3, the spatial principles and relevant priorities set out in RDF1 and 2, DP policies and policies RDF4, EM5 L1 and L5”.</p> <p>g. In the next to last paragraph, there are some concerns that the text could imply that Green Belt alteration and rural exceptions could be considered almost as a matter of course. The supporting text clarifies that such approaches can only be considered in specific circumstances</p> <p>h. PPS 3 provides further clarification of the circumstances when rural exceptions can be considered and whilst supporting text does not need to repeat national guidance it should provide reference to PPS3 or ensure it reflects most recent guidance</p> <p>i. In relation to the Green Belt references, there is a concerns that the current wording of the policy may appear to undermine</p> <p>i. the permanence of the Green Belt and may lead to potential conflict with RDF4. PPG2 makes it clear that such uses are not an appropriate use of the Green Belt and that boundaries should only be altered in exceptional circumstances</p> <p>ii. the sustainability of sites and the ability to access to services and facilities</p> <p>iii. the ability of gypsy and traveller communities to be part of mixed inclusive communities”</p>
Hyndburn Borough Council	Yes	-
Knowsley MBC	No	We disagree with the pitch distribution figures. Although we agree that a co-ordinated sub-regional review of the GTAA should be undertaken by 2013, there seems to be little point if the findings of assessment are subsequently disregarded.

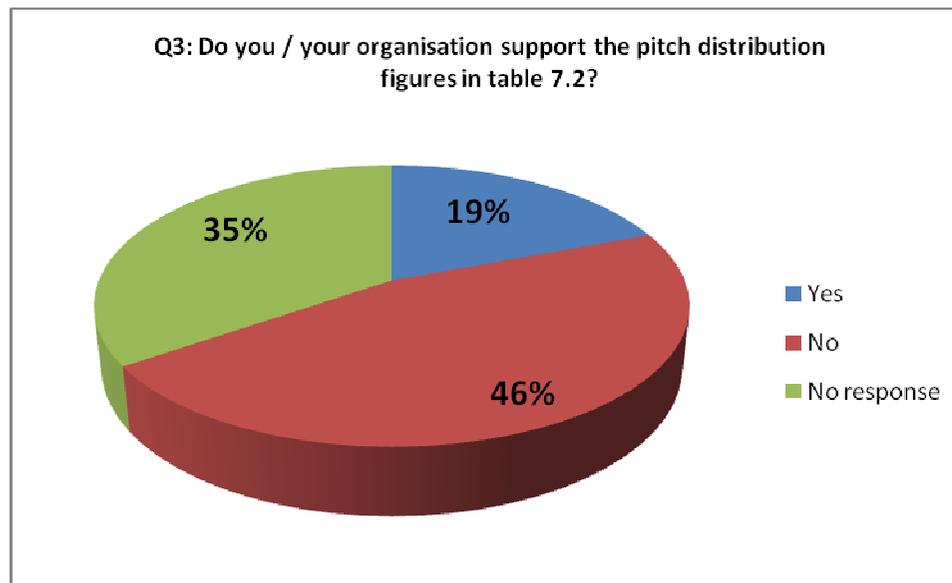
<b>Organisation:</b>	<b>1. Do you / your organisation support the Interim Draft Policy L7 – Scale &amp; Distribution of Travelling Showpeople Plot Provision?</b>	<b>2. Please tell us why you have given this response. (If your comment relates to pitch distribution please go to question 5.)</b>
Lake District National Park Authority	Yes	Generally support, although you may want to think about presenting some of the information as supporting text to make the policy more punchy.
Lancashire County Council	-	<p>Several issues arise from the interim draft policy. In relation to the principle of the policy:</p> <p>There is support in principle for the inclusion of a policy which sets out requirements for Travelling Showpeople accommodation needs as required by Circular 4/2007, including requirements for individual districts. It is accepted that the North West and Lancashire Sub regional GTAA's identify a need for additional plots for Travelling Showpeople. Policies need to be founded on a sound evidence base and will be subject to examination in public. Paragraph 22 of Circular 4/2007 states that, "Regional Planning Bodies should maintain an up to date understanding of the likely strategic accommodation requirements of their area over the lifespan of the RSS which should inform the preparation and review of the RSS</p>
Macclesfield Borough Council	No	As with the Gypsies and Travellers policy, it is unclear how the requirement figures have been formulated. It is not considered that sufficient evidence or justification has been provided to enable a full assessment of the pitch figures proposed.
Northwest Regional Development Agency	-	The general thrust of the interim draft policy for Travelling Showpeople reflects the requirements of DCLG Circulars 01/2006 and 04/2007 which deal with Planning for Travelling Showpeople.
On behalf of Liverpool and Sefton Councils	No	Because of the pitch distribution figures
Sefton MBC	No	Because of the pitch distribution figures
South Lakeland District Council.	-	We would expect that the policies on the scale and distribution of gypsy and travellers pitch provision and travelling showpeople plot provision would match that in our own evidence – the Cumbria Gypsy and Traveller Accommodation Needs Assessment. This is necessary to ensure that they are justifiable.

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South Ribble Borough Council	No	<p>"Central Lancashire Authorities Response to 4NW Accommodation for Travelling Showpeople: Interim Draft Policy L7- Scale and Distribution of Travelling Showpeople Plot Provision Introduction</p> <p>1 The Central Lancashire authorities of Preston City Council, South Ribble Borough Council and Chorley Council support the principle of Interim Draft Policy L7 and recognise the need to provide additional plots for Travelling Showpeople in the region. However the Central Lancashire authorities do object to the Travelling Showpeople Plot Provision identified for each authority."</p>
South Ribble Borough council	No	<p>"South Ribble Borough Council Response to 4NW Accommodation for Travelling Showpeople: Interim Draft Policy L7- Scale and Distribution of Travelling Showpeople Plot Provision Introduction</p> <p>1 South Ribble Borough Council supports the principle of Interim Draft Policy L7 and recognises the need to provide additional plots for Travelling Showpeople in the region. However the Borough Council does object to the Travelling Showpeople site provision identified for the authority. Proposed Plot Allocations</p> <p>2 South Ribble Borough Council has been allocated a plot provision number of 10 additional plots for the period to 2016</p> <p>3 Beyond 2016 to 2021 provision will be made across the region for an annual 3% compound increase in the level of overall plot provision. Therefore the Borough Council is being asked to provide 10 plots (2007 – 2016) and 2 further plots (2016- 2021), 12 in total over the whole period. This additional compound provision would need to be future proofed in that the further allocation to 2021 would need to be raised from 2 to 5 plots.</p> <p>4 The Borough Council rejects the individual authority proposed plot provision on the basis that more evidence needs to be provided by 4NW and the Showmens Guild about the need for pitches in the local authority areas (additional information has been requested by Lancashire authorities). The proposed plot provision seems to be based on a preference by a small percentage of Travelling Showpeople to be located in the central Lancashire area, as it will assist their travelling patterns and a requirement by</p>

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		4NW to spread the plot distribution around Lancashire."
St Helen's MBC	No	The Local Authority raise concern that these figures go against the evidence of the GTAA findings, which showed a requirement of nil provision. There is a willingness to accept that provision should be made, subject to sufficient evidence to justify that there is a need for this level of provision in St Helens. Whilst we are not discounting that a potential need exists, it remains unclear how the required provision relates to the sub-regional need and operational requirements of Travelling Showpeople. The methodology of the additional study work, and its findings, have not been provided to justify the disregard of the GTAA findings. We would like to fully understand how this provision would link with provision in neighbouring authorities relative to the overall need. However, it remains unclear from the methodology and evidence provided exactly how the figures for St Helens have been arrived at.
Warrington Borough Council	Yes	Warrington Borough Council supports the objectives of and wording of draft policy L7.
West Lancashire District Council	Yes	
Wirral MBC	No	Wirral Council has a firm and stated commitment to work closely with its partners to ensure that everyone living, visiting and working in the Borough will be treated fairly and with respect regardless of their race, gender, age, disability, sexual orientation or faith. However, in this case the Council is concerned that Draft Interim Policy L7 and the proposed pitch distribution figures set out in Table 7.3 are not fully supported by the available evidence. The statement that where Local Development Frameworks look beyond 2016 provision will be made for the same proportion of the regional requirement as in Table 7.3 for 2007-2016 is not clear. It is, for example, not clear whether the annual 3% compound increase to be applied post-2016 will be applied pro-rata at district level, irrespective of local need or demand. The requirement for new major developments to include provision for travelling showpeople is unduly restrictive and poorly defined in terms of the types of land use or development being considered and appears contrary to the intention to identify sites through Local Development

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		<p>Frameworks. The Policy text with regard to sites in the Green Belt should better reflect the comments provided in the supporting text, which make it clear that this option should be a last resort, in exceptional circumstances, where all other alternatives have been exhausted. While the text on the possibility of redistributing provision through the preparation of joint or co-ordinated Local Development Documents is welcome, the implications of a “co-ordinated” approach should be clarified in the supporting text for the avoidance of doubt.</p>

### 3. Do you / your organisation support the pitch distribution figures in table 7.2?



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

The table below shows the verbatim comments received.

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.																		
AGMA	-	<p>"Regional Distribution 3.3</p> <p>AGMA broadly supports the need to address the preferences of Travelling Showpeople because of the need to locate Showpeople in areas where they apply most of their trade and to try and achieve a more equitable distribution of sites across the region.</p> <p>At the moment, GM currently has 72% (see Table 4) of the Region's total provision for Travelling Showpeople but the evidence in the research provided by the Showmen's Guild suggests that a considerable amount of their trade is applied outside of GM throughout the year. Therefore, the Partial Review of RSS provides an opportunity to achieve a more equitable regional distribution of provision for Travelling Showpeople outside of GM, which also meets their needs. Table 4 - Proposed Sub-regional Distribution at 2016 for Travelling Showpeople</p> <table border="1" data-bbox="743 798 1796 989"> <thead> <tr> <th>Sub-Region</th> <th>Current Provision</th> <th>% of total</th> </tr> </thead> <tbody> <tr> <td>Cumbria</td> <td>50</td> <td>10%</td> </tr> <tr> <td>Cheshire</td> <td>22</td> <td>5%</td> </tr> <tr> <td>M'side</td> <td>0</td> <td>0%</td> </tr> <tr> <td>G M'cr</td> <td>356</td> <td>72%</td> </tr> <tr> <td><b>Total</b></td> <td><b>492</b></td> <td><b>100%</b></td> </tr> </tbody> </table> <p>3.4 As the policy is currently drafted, GM would still have the vast majority of the Region's total provision for Travelling Showpeople by 2016 (65%). Whilst this is less than the current percentage of 72%, AGMA considers that the proposed distribution could be more evenly distributed throughout the region. Merseyside, for example, has no provision at present and would only have 1% of the total regional provision by 2016 under the current Draft Policy, despite having similar links to the region's motorway networks and being of a similar size and area to GM.</p> <p>3.5 Therefore, although the Draft Policy does try to redistribute some of the new provision for Travelling Showpeople away from the GM sub-region, AGMA suggests that 4NW should consider an even greater distribution of requirements to provide a more even spread of provision across the region over the longer term. Sub-Regional Distribution</p> <p>3.6 It has become clear that there will need to be some redistribution of the pitch</p>	Sub-Region	Current Provision	% of total	Cumbria	50	10%	Cheshire	22	5%	M'side	0	0%	G M'cr	356	72%	<b>Total</b>	<b>492</b>	<b>100%</b>
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		<p>requirements within the GM sub-region from the discussions that have taken place at the workshops. At the moment four districts within GM have no provision but AGMA accepts that these may need to provide some level of provision to meet the needs and preferences of the Travelling Showpeople.</p> <p>3.7 However, AGMA does have some concerns as to whether the proposed pitch provisions in some districts within GM will be utilised, where there is no direct evidence of need. This concern is particularly applicable to Stockport, where the GM GTAA and Draft Policy currently indicate no pitch requirements. It has been suggested that Stockport may need to provide for 20 pitches in the light of the evidence on preferences supplied by the Travelling Showpeople. Stockport have indicated that an initial requirement of 10 pitches would be more appropriate to facilitate the geographical spread within the sub-region but allow true demand over the longer term to be determined in the next review of RSS. AGMA reserves the right to comment on any revised pitch requirements for Travelling Showpeople in the next stage of consultation."</p>
Allerdale Borough Council	No	As above. Please refer to our submission on G & T Policy L6.
Blackpool Council	-	<p>Blackpool Council finds it difficult to firmly support or object to the plot distribution figure in the context of the limitations in the information which has been made available. The Policy seeks to address where people currently live and would like to live – also having regard to locations where previously little provision is made, but where fairground sites and their work is currently located.</p> <p>It is understood that the consultation with the Showmans Guild members has informed the process, but the information provided only shows broadly in which LPAS there is any need. It provides no detail of the precise numbers of fairs and their distribution across the Region. In these terms, for example, Blackpool Council is aware there are 16 fairs in the Fylde Sub-Region, only 2 of which take place in Blackpool. It is not known how this compares with the incidence of fairs elsewhere across the NW Region. Nevertheless, it is accepted that some increased provision is needed in the Fylde Sub-Region. Whether it is of the scale proposed, which represents a major increase from the earlier Lancashire GTAA Survey (which only identified the need for 3 additional TSP plots for the Fylde Sub-Region – as against 30 now required by draft Policy L7) or a significantly lower figure is questioned. Equally, the evidence for an equal split of</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.2?</b>	<b>4. Please tell us why you have given this response.</b>
		required provision across the Fylde Sub-Region is unclear – both in relation to the incidence of fairs (only 2 of 16 in Blackpool) and, in Blackpool’s terms, its acute shortage of land and already high level of existing provision of the separate, but still similar requirements for Gypsy and Traveller sites.
Cheshire East Council	Yes	Consultation with the G&T Co-ordinator for the Cheshire sub-regional partnership has indicated that a higher figure than that in the GTAA for Cheshire could be justified based on the additional information contained in the Showmen’s Guild report on current & preferred base locations and operating patterns for Travelling Showpeople based in the North West region.
Cheshire West and Chester Council	No	<p>Whilst the provision of additional information is noted Cheshire West and Chester is seeking further clarification. It is understood that the figures consulted upon before Christmas took account of the report produced by the Showmen’s Guild. This report identified 3 plots for Cheshire West &amp; Chester for Travelling Showpeople although the GTAA identified 4 plots. The figures now consulted upon are for 10 plots. It would be helpful to demonstrate how the final figure for the authority was arrived at to enable an informed response (it is noted that the Showman’s Guild state that plots need to be at least 5 pitches).</p> <p>Consultation with the G&amp;T Co-ordinator for the Cheshire sub-regional partnership has indicated that a higher figure than that in the GTAA for Cheshire could be justified, however the Council would still like to see the reasoning behind the suggested figure.</p>
Chorley Borough Council	-	<p>2. Chorley Council has been allocated 10 additional travelling showpeople plots for the period to 2016. Beyond 2016 to 2021 provision will be made across the region for an annual 3% compound increase in the level of overall plot provision. This will mean that a further 2 plots are needed in Chorley, which when future proofed will rise to 5 plots. Therefore, 15 plots in total will be required in the Borough up until 2021.</p> <p>3. Chorley Council rejects the level of plot provision proposed on the basis that more evidence needs to be provided by 4NW and the Showmen’s Guild about the need for pitches in the Borough ( additional information has been requested by Lancashire authorities). The proposed plot provision seems to be based on a preference by a small percentage of Travelling Showpeople to be located in the Central Lancashire area (including Chorley) , as it will assist their travelling patterns and a requirement by 4NW to spread the plot distribution around Lancashire.</p> <p>4. The Lancashire GTAA07 indicated a requirement for 9 additional pitches in</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
		<p>Lancashire between 2006 and 2016, but did not find a requirement for any pitches in Chorley. The Interim draft RSS policy initially required 14 plots in Chorley Borough, which has risen to 15 plots in the draft RSS policy, when future proofing is taken into account . This level of provision is astonishing when compared with the Lancashire GTAA suggested requirement of 0 plots.</p> <p>5. 4NW state that the methodology for Travelling Showpeople plots was never driven by the GTAA and that this evidence was just a starting point and the option now suggested is a more equitable distribution that supports the needs of Travelling Showpeople. They also highlight that the GTAA failed to ask about overcrowding and doubling up. However, there appears to be very little evidence to support this position.</p> <p>6. A survey of Travelling Showpeople produced for the North West by 4NW with assistance from the Showmens Guild provides little evidence of need, but simply suggests that every one of the 41 authorities in the North WEst should set aside 1 acre for 10 plots , which would sort out all requirements. A further study ' The North West's Travelling Showpeople's Current Base Location, Preferred Base Locations and Operating Patterns' 4NW, 2008 is based on data collected in the Showmen's Guild Travelling Preference Survey (Autumn 2007). this study identified that there are small proportions of Travelling Showpeople based in Chorley Borough. 3.1% to 6% location (multiple) show the same percentage preference. The report indicates in its comparison of current base to preferred base that Travelling Showpeople operating in the NW would ideally like to be based in Bolton or Preston. Chorley is not identified. The report also found that no operating patterns wer identified in Chorley during Dec 2006- Oct 2007 for Travelling Showpeople. The Report does conclude that there is a definite need for a wider breadth of provision across the region. Travelling Shopeople say that they need ot be located in more suitable locations to reflect their travelling patterns and that overcrowding on existing sites and doubling up leads to unacceptable conditions. Geographically central locations are favoured with good mortoway links, but a judgement is still required on locations. there is little hard evidence to support that level of provision proposed in Chorley Borough.</p> <p>To conclude, in the absence of clear evidence of substantial need , Chorley Council objects to the high proposed allocation of plots for Travelling Showpeople in Chorley Borough.</p>
CPRE North West	Yes	We would not wish to comment on the detail of the figures as we have not analysed the evidence on which they are based. However, we support the methods by which the

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.2?</b>	<b>4. Please tell us why you have given this response.</b>
		figures have been derived, ie analysis of actual need, including consultation with the Showman's Guild and settled communities.
Cumbria County Council.	No	Please see response to ques 4
Director of Development Preston City Council	-	<p>"Proposed Plot Allocations</p> <p>2 Preston City, South Ribble and Chorley Councils have both been allocated the same proposed plot provision number – 10 additional plots each for the period to 2016</p> <p>3 Beyond 2016 to 2021 provision will be made across the region for an annual 3% compound increase in the level of overall plot provision. Therefore the Central Lancashire area is being asked to provide 30 plots (2007 – 2016) and 6 further plots (2016- 2021), 36 in total over the whole period. This additional compound provision would need to be future proofed in that the further allocation to 2021 would need to be raised from 2 to 5 plots.</p> <p>4 The Central Lancashire authorities rejects the individual authority proposed plot provision on the basis that more evidence needs to be provided by 4NW and the Showmens Guild about the need for pitches in the three local authority areas (additional information has been requested by Lancashire authorities). The proposed plot provision seems to be based on a preference by a small percentage of Travelling Showpeople to be located in the central Lancashire area, as it will assist their travelling patterns and a requirement by 4NW to spread the plot distribution around Lancashire."</p>
Fylde Borough Council	No	The Council has seen no hard or numerical evidence to support the need for the 10 additional plots indicated in Table 7.3. Together with the draft provision in Blackpool and Wyre, this would equate to a Fylde sub-region provision of 30 plots. To date the alleged need has not demonstrated itself in terms of approaches made by the travelling community to the Council in recent years. The Council would prefer to abide by the findings of the Lancashire Gypsy and Traveller Accommodation Assessment published in May 2007.
GONW	No	See comments above in relation to evidence base
Hyndburn Borough Council	Yes	Hyndburn already has a Travelling Showpeople's site of significant size that is normally under utilised / occupied therefore agrees with the proviso that no further provision is required in the Borough. However please see comments below at Q9.
Knowsley MBC	No	The Merseyside GTAA is considered to be a robust evidence base. Its conclusions

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.2?</b>	<b>4. Please tell us why you have given this response.</b>
		should therefore form the basis for RSS provision.
Lake District National Park Authority	No	We would like to see a reference to the LDNP with a '0' allocation made in table 7.3. This would make it clear and limit the need for assumptions.
Lancashire County Council	-	<p>In relation to the specific requirements set out in the policy:</p> <p>The overall requirement for additional plots in the North West is significantly above the level identified in the GTAA. The overall requirement of 75 additional plots in Lancashire is significantly above the 9 plots identified in the Lancashire GTAA.</p> <p>The principle of having a broader geographic distribution of provision is supported in the surveys of Travelling Showpeople which are used to inform the interim draft policy. However it is not clear how the surveys have informed the increase in plot requirements in Lancashire above those of the GTAA or how they have informed the distribution of plots in Lancashire. The supporting evidence should be clear in order for the policy to be sound.</p>
Macclesfield Borough Council	No	See previous answer.
Northwest Regional Development Agency	-	<p>We have no wish to comment on the overall scale of provision or figures for individual local authorities, which are based on evidence from the surveys of Travelling Showpeople undertaken in 2007 and 2008. However, on a point of detail, we note that the figures for the Cumbria sub-region in Tables 7.2 and 7.3 exclude the Lake District National Park. Further clarification is required as to whether the figures for Allerdale, Copeland, Eden and South Lakeland relate to the areas outside the National Park. We suggest that the position with regard to the National Park is made explicitly clear (for example, by including a zero requirement within the tables if this is the case) We do, however, wish to express our support for the underlying approach which seeks to address the current uneven distribution of plots for Travelling Showpeople. By increasing provision in areas where choices are currently constrained by a lack of facilities, and by widening the geographic distribution to increase provision in areas beyond those where the highest levels of need are evident, these policies will help to widen the opportunities available to these communities.</p>
On behalf of Liverpool and Sefton Councils	-	"Please note: delegated authority as been granted to Sefton officers to make an official response on behalf of Sefton Council. For Liverpool these constitute officer level comments only which augment but do not supersede separate comments they have

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
		<p>prepared for their authority. Knowsley are unable to share in making officer level comments but they have expressed concern at the way the partial review figures have been derived in their own separate response.</p> <p>The evidence for the requirement needs to be clarified. The Merseyside Gypsy &amp; Traveller Accommodation Assessment (MG&amp;TAA) did not identify any need for Travelling Showperson's accommodation within the study area of Knowsley, Liverpool, Sefton and Wirral.</p> <p>The evidence presented that there is need for sites is based on a survey of an undefined proportion of Travelling Showpeople who are members of the Showmen's Guild. Unfortunately it does not indicate how many travelling Showpeople operate outside of the Guild, the sample size, what the response rate was. It indicates that two respondents indicated a preference for a site in Sefton and Wirral, and 5 other respondents indicated Sefton or Wirral as one of several preferred locations. It would have been useful to know:</p> <ul style="list-style-type: none"> <li>• who requires sites in Sefton and Wirral;</li> <li>• the size of site and number of pitches required (a 5 pitch site has been chosen arbitrarily);</li> <li>• for those who indicated a multiple preference, what other locations they considered so we can liaise with other Councils;</li> <li>• what size of site was required;</li> <li>• where exactly are they required – although we recognise that a RSS is not required to say where the pitches are required, this is important as both Sefton and Wirral are large boroughs;</li> <li>• whether they were looking to purchase or rent a site (either from the Council/RSL or a private landlord) and what their financial capacity was; and</li> <li>• indicate whether there is a need for temporary site and if so, what size. We intend to contact 4NW shortly to see if this information can be obtained so that we may explore this matter further."</li> </ul>
Sefton MBC	No	<p>"Please note: delegated authority as been granted to Sefton officers to make an official response on behalf of Sefton Council.</p> <p>Sefton does not support the requirement for the provision of 5 Travelling Showperson's pitches (on one site) in Sefton as it feels that the evidence needs to be clarified first.</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
		<p>The Merseyside Gypsy &amp; Traveller Accommodation Assessment (MG&amp;TAA) did not identify any need for Travelling Showperson's accommodation within the study area of Knowsley, Liverpool, Sefton and Wirral.</p> <p>The requirement for TSP pitches in Sefton was unexpected as there has not been a pre-application inquiry or actual application for a Travelling Showpersons site in Sefton to the knowledge of current Development Control staff. Travelling fairs do operate in Sefton, although the majority are fairly small in size, with only a few larger fairs. There is a permanent operation at the former Pleasureland site in Southport, however it is hard to see how this would necessitate a permanent site. The evidence presented that there is need for a site is based on a survey of an undefined proportion of Travelling Showpeople who are members of the Showmen's Guild. Unfortunately it does not indicate how many travelling Showpeople operate outside of the Guild, the sample size, what the response rate was. It indicates that one respondent indicated a preference for a site in Sefton, and 2 other respondents indicated Sefton as one of several preferred locations. It would have been useful to know:</p> <ul style="list-style-type: none"> <li>• who requires sites in Sefton;</li> <li>• the size of site and number of pitches required (a 5pitch site has been chosen arbitrarily);</li> <li>• for those who indicated a multiple preference, what other locations they considered so we can liaise with other Councils;</li> <li>• what size of site was required;</li> <li>• where exactly in Sefton they required – although we recognise that a RSS is not required to say where the pitches are required, this is important as Sefton is over 15 miles from top to bottom and over 8 miles wide;</li> <li>• whether they were looking to purchase or rent a site (either from the Council/RSL or a private landlord) and what their financial capacity was; and</li> <li>• indicate whether there is a need for temporary site and if so, what size.</li> </ul> <p>Sefton intends to contact 4NW shortly to see if this information can be obtained so that we may explore this matter further.</p> <p>Sefton has a very limited supply of available land for housing and employment uses. Although we understand that the requirement for Travelling Showpeople pitches is modest, it will still be challenging to find suitable sites."</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
South Lakeland District Council.	-	<p>"The draft interim policies propose (for South Lakeland):</p> <ul style="list-style-type: none"> <li>• A minimum of 10 additional permanent residential pitches between 2007 and 2016 for gypsy and travellers.</li> <li>• A minimum of 5 additional transit residential pitches over the same timescale.</li> <li>• A minimum of 5 additional plots for travelling showpeople between 2007 and 2016</li> </ul> <p>The Cumbria Gypsy and Traveller Accommodation Needs Assessment suggest that there is a need for (in South Lakeland):</p> <ul style="list-style-type: none"> <li>• 5 extra residential pitches between 2007 and 2016 for gypsies and travellers</li> <li>• 5 extra transit pitches over the same timescale.</li> <li>• 3 additional plots for travelling showpeople between 2007 and 2016</li> </ul> <p>Therefore it is felt that amendments are required to ensure that the figures in the policy are consistent with evidence and robust. Namely:</p> <ul style="list-style-type: none"> <li>• The target for new permanent residential pitches for gypsies and travellers should be reduced from 10 to 5.</li> <li>• The target for plots for travelling showpeople should be reduced from 5 to 3.</li> </ul> <p>Given that these are intended as minimum standards, and that our LDF will include a positively worded policy on Gypsies and Travellers and Travelling Showpeople (which could support further provision) a higher target is considered unjustified. Indeed, setting a higher target in the RSS could present particular problems for a District where sustainable development land is at a premium."</p>
South Ribble Borough Council	-	<p>"Proposed Plot Allocations</p> <p>2 Preston City, South Ribble and Chorley Councils have both been allocated the same proposed plot provision number – 10 additional plots each for the period to 2016</p> <p>3 Beyond 2016 to 2021 provision will be made across the region for an annual 3% compound increase in the level of overall plot provision. Therefore the Central Lancashire area is being asked to provide 30 plots (2007 – 2016) and 6 further plots (2016- 2021), 36 in total over the whole period. This additional compound provision would need to be future proofed in that the further allocation to 2021 would need to be raised from 2 to 5 plots.</p> <p>4 The Central Lancashire authorities rejects the individual authority proposed plot provision on the basis that more evidence needs to be provided by 4NW and the</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
		<p>Showmens Guild about the need for pitches in the three local authority areas (additional information has been requested by Lancashire authorities). The proposed plot provision seems to be based on a preference by a small percentage of Travelling Showpeople to be located in the central Lancashire area, as it will assist their travelling patterns and a requirement by 4NW to spread the plot distribution around Lancashire."</p>
South Ribble Borough council	No	<p>"The Lancashire GTAA 07 indicated a requirement for 9 additional pitches in Lancashire between 2006 and 2016 and identified 0 pitches for South Ribble.</p> <p>7 The interim draft RSS policy initially required 9 plots in South Ribble.</p> <p>8 The draft RSS policy (Jan 09) now seeks that South Ribble accommodates 10 plots to 2016 and a further 2 until 2021 which will need to be future proofed so the requirement will be 15 plots in total for the Borough.</p> <p>9 Clearly the pitch provision for South Ribble (2007 –2021), when compared with the Lancashire GTAA suggested requirement of 0 plots, is an astonishing level of new provision. So is the requirement to require 75 additional plots for travelling show people in Lancashire out of a North West total of 285 (26% of NW provision).</p> <p>10 4NW now say the largest percentage of requirement in the North West is in Greater Manchester but this does not reflect the needs of Travelling Showpeople (TS). 4NW now say the methodology for Travelling Showpeople plots was never driven by the GTTA, the evidence was just a starting point and the option now supported is more equitable distribution that supports the needs of the Travelling Showpeople. The GTTA also failed to ask about overcrowding and doubling up.</p> <p>11 The Showmen’s Guild represents members of the Travelling Showpeople and is a national organisation subdivided into regions. A survey of Travelling Showpeople produced for the North West by 4NW with assistance from The Showmen’s Guild analyses existing supply of pitches but provides little evidence of need. It simply suggests that every one of the 41 authorities in the North West should set aside 1 acre to allow for 10 plots each and that would sort out all requirements.</p> <p>12 A further study “The North West’s Travelling Show people’s Current Base Location, Preferred Base Locations and Operating Patterns” 4NW, 2008 is based on data collected in the Showmen’s Guild Travelling Preference survey (Autumn 2007).</p> <p>13 400 plus surveys were sent out and 110 were returned. The study identified that there were no travelling showpeople currently based in South Ribble. The report looked at where Travelling Showpeople if given a choice would prefer to be based</p>

Organisation:	3. Do you / your organisation support the pitch distribution figures in table 7.2?	4. Please tell us why you have given this response.
		<p>incomparison to their current base. The report identified that given a choice, 2.5% of the travelling Showpeople surveyed identified a single preference for South Ribble. In relation to those that identified a number of preferred locations 3.2 % chose South Ribble</p> <p>14 The report indicates in its comparison of current base to preferred base that Travelling Showpeople operating in the NW would ideally like to be based in Bolton or Preston. South Ribble is not identified</p> <p>15 The report also looked at operating locations i.e. fairs at different intervals of the year. No operating patterns were identified in the Borough South Ribble during Dec 2006 – Oct 2007 for Travelling Showpeople.</p> <p>16 However the report concludes there is a definite need for a wider breadth of provision of permanent and temporary pitches across the region. Travelling Showpeople prefer to be based elsewhere i.e. coastal and central districts of the region. Issues of overcrowding and doubling up on existing sites are common therefore provision needs to be improved elsewhere.</p> <p>17 The Showmen’s Guild says what is not reflected in the GTTA study provision is where Travelling Showpeople are now based and in relation to their travelling position where is there a suitable location for them to be based. Travelling Showpeople say they need to be located in more suitable locations to reflect their travelling patterns. Overcrowding on existing sites and doubling up leads to unacceptable conditions and personal requirements (i.e. more room for offspring to marry and have larger caravans).</p> <p>18 It would seem that geographical central locations are favoured and this makes the South Ribble area, a central location with good motorway networks, a favoured location. However there needs to be a judgment on locations."</p>
St Helen's MBC	No	<p>What is unclear is whether the figures can be justified as there are requirements in neighbouring authorities and there is a risk of duplicating need here if the same group are pursuing sites in a number of authorities but only require one site. If evidence can be provided to validate this element then we would have no particular problem with the figures.</p>
Warrington Borough Council	Yes	<p>The level of provision proposed for the Borough, identified at Table 7.3 of the draft policy, closely aligns with the level of need previously identified within the Cheshire Gypsy and Traveller Accommodation Assessment. The additional evidence which has</p>

<b>Organisation:</b>	<b>3. Do you / your organisation support the pitch distribution figures in table 7.2?</b>	<b>4. Please tell us why you have given this response.</b>
		been used to modify this previously identified need is considered robust and credible and the plot provision proposed for Warrington is therefore supported.
West Lancashire District Council	Yes	-
Wirral MBC	No	<p>The Showmans Guild Preference Survey, on which the proposed distribution figures are based, does not explain why Wirral was identified as a preferred permanent base while surrounding districts such as Liverpool, Knowsley, Ellesmere Port and Chester were not identified, especially given the pattern of activity recorded across the wider sub-region including north Cheshire and North Wales. It is not evident, for example, why Wirral would be preferred ahead of a more accessible site in Cheshire West and Chester. The reference in Appendix 3 of the analysis of the Preference Survey to the number of preferences for a preferred base location in Wirral MBC as "1.16" implies that the underlying figures have been apportioned in some way and may not, therefore, represent a focused preference for a site in Wirral. It is not clear how the figures in Appendix 3 (for single preferences) and the figures in Appendix 4 (for multiple preferences) relate. The use of the term "the Wirral" in some parts of the report could also indicate a potential confusion in the Survey responses between the Metropolitan Borough of Wirral and the rest of the Wirral peninsula.</p> <p>The underlying data has not been provided. It is not clear whether the preferences recorded in the Survey relate to single plots or groups of plots (extended families). Assuming that they relate to single plots, the scale of preference indicated for Wirral would not appear to be strong enough to justify the identification of a 5 plot site in Wirral. The higher figure would not be justified where the figures in Draft Interim Policy L7 are already expressed as "at least" and the figures in Table 7.3 are expressed as the minimum to be provided.</p>

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

The table below shows the verbatim comments received.

Organisation:	5. Do you have any comments to make about the supporting text?
AGMA	-
Allerdale Borough Council	The proposals need to be more robustly argued with clear reference to evidence.
Blackpool Council	no
Cheshire East Council	-
Cheshire West and Chester Council	-
Chorley Borough Council	-
CPRE North West	We support the supporting text as it stands
Cumbria County Council.	None other than as already stated in Ques 4
Director of Development Preston City Council	<p>"Range of Studies and Evidence</p> <p>5 The Lancashire GTAA 07 indicated a requirement for 9 additional pitches in Lancashire between 2006 and 2016 and identified 0 pitches for Preston South Ribble and Chorley.</p> <p>6 The interim draft RSS policy initially required 21 plots in Preston</p> <p>7 The interim draft RSS policy initially required 9 plots in South Ribble.</p> <p>8 The interim draft RSS policy initially required 14 plots in Chorley Borough. The draft RSS policy (Jan 09) now seeks that Chorley Preston and South Ribble each accommodate 10 plots to 2016 and a further 2 until 2021 which will need to be future proofed so the requirement will be 15 plots in total for each Borough.</p> <p>9 Clearly the pitches for Preston City, South Ribble and Chorley (2007 –2021), and compared with the Lancashire GTAA suggested requirement of 0 plots, is an astonishing level of new provision. So is the requirement to require 75 additional plots for travelling show people in Lancashire out of a North West total of 285 (26% of NW provision).</p> <p>10 4NW now say the largest percentage of requirement in the North West is in Greater Manchester but this does not reflect the needs of Travelling Showpeople (TS). 4NW now say the methodology for Travelling Showpeople plots was never driven by the GTTA, the evidence was just a starting point and the option now supported is more equitable distribution that supports the needs of the Travelling Showpeople. The GTTA also failed to ask about overcrowding and doubling up.</p>

Organisation:	5. Do you have any comments to make about the supporting text?
	<p>11 The Showmen's Guild represents members of the Travelling Showpeople and is a national organisation subdivided into regions. A survey of Travelling Showpeople produced for the North West by 4NW with assistance from The Showmen's Guild analyses existing supply of pitches but provides little evidence of need. It simply suggests that every one of the 41 authorities in the North West should set aside 1 acre to allow for 10 plots each and that would sort out all requirements.</p> <p>12 A further study "The North West's Travelling Show people's Current Base Location, Preferred Base Locations and Operating Patterns" 4NW, 2008 is based on data collected in the Showmen's Guild Travelling Preference survey (Autumn 2007).</p> <p>13 400 plus surveys were sent out and 110 were returned. The study identified that there were no travelling showpeople currently based in South Ribble. The report looked at where Travelling Showpeople if given a choice would prefer to be based in comparison to their current base. The report identified that given a choice, 2.5% of the Travelling Showpeople surveyed identified a single preference for South Ribble. In relation to those that identified a number of preferred locations 3.2 % chose South Ribble.</p> <p>14 This study identified there are small proportions of travelling show people based in Chorley Borough (0.1-2%).</p> <p>15 3.1 to 6% indicated a single preference to be in Chorley. Those that chose more than one preferred location (multiple) showed the same percentage 3.1 to 6% for Chorley. The report indicates in its comparison of current base to preferred base that Travelling Showpeople operating in the NW would ideally like to be based in Bolton or Preston. Chorley and South Ribble are not identified.</p> <p>16 The report also looked at operating locations i.e. fairs at different intervals of the year. No operating patterns were identified in the Boroughs of Chorley and South Ribble during Dec 2006 – Oct 2007 for Travelling Showpeople.</p> <p>17 However the report concludes there is a definite need for a wider breadth of provision of permanent and temporary pitches across the region. Travelling Showpeople prefer to be based elsewhere i.e. coastal and central districts of the region. Issues of overcrowding and doubling up on existing sites are common therefore provision needs to be improved elsewhere.</p> <p>18 The Showmen's Guild says what is not reflected in the GTTA study provision is where Travelling Showpeople are now based and in relation to their travelling position where is there a suitable location for them to be based. Travelling Showpeople say they need to be located in more suitable locations to reflect their travelling patterns. Overcrowding on existing sites and doubling up leads to unacceptable conditions and personal requirements (i.e. more room for offspring to marry and have larger caravans).</p> <p>19 It would seem that geographical central locations are favoured and this makes the Central Lancashire authorities a central location with good motorway networks. However there needs to be a judgement on locations."</p>
Fylde Borough Council	
GONW	See comments above but note much of the supporting text is similar to that for Gypsy and Traveller policy and

Organisation:	5. Do you have any comments to make about the supporting text?
	consider there may be ways to reduce repetition
Hyndburn Borough Council	
Knowsley MBC	The content of the supporting text is sufficient.
Lake District National Park Authority	
Lancashire County Council	
Macclesfield Borough Council	
Northwest Regional Development Agency	We note the remark in the supporting text that the distributions of additional plots, nevertheless, remain concentrated to a significant degree in the areas where Travelling Showpeople currently reside. Whilst this is not an area of direct concern to the NWDA, we would encourage 4NW and the local authorities to reach a wide consensus that is seen as fair and equitable by all concerned. In respect of the policy, we welcome and support references in the supporting text which helpfully set out the position in respect of: (a) sites for Travelling Showpeople in the Green Belt having regard to national planning policy in PPG 2; and (b) factors to be taken into consideration when assessing the suitability and design of sites.
On behalf of Liverpool and Sefton Councils	no
Sefton MBC	No
South Lakeland District Council.	
South Ribble Borough Council	<p>"Range of Studies and Evidence</p> <p>5 The Lancashire GTAA 07 indicated a requirement for 9 additional pitches in Lancashire between 2006 and 2016 and identified 0 pitches for Preston South Ribble and Chorley.</p> <p>6 The interim draft RSS policy initially required 21 plots in Preston</p> <p>7 The interim draft RSS policy initially required 9 plots in South Ribble.</p> <p>8 The interim draft RSS policy initially required 14 plots in Chorley Borough. The draft RSS policy (Jan 09) now seeks that Chorley Preston and South Ribble each accommodate 10 plots to 2016 and a further 2 until 2021 which will need to be future proofed so the requirement will be 15 plots in total for each Borough.</p> <p>9 Clearly the pitches for Preston City, South Ribble and Chorley (2007 –2021), and compared with the Lancashire GTAA suggested requirement of 0 plots, is an astonishing level of new provision. So is the</p>

Organisation:	5. Do you have any comments to make about the supporting text?
	<p>requirement to require 75 additional plots for travelling show people in Lancashire out of a North West total of 285 (26% of NW provision).</p> <p>10 4NW now say the largest percentage of requirement in the North West is in Greater Manchester but this does not reflect the needs of Travelling Showpeople (TS). 4NW now say the methodology for Travelling Showpeople plots was never driven by the GTTA, the evidence was just a starting point and the option now supported is more equitable distribution that supports the needs of the Travelling Showpeople. The GTTA also failed to ask about overcrowding and doubling up.</p> <p>11 The Showmen’s Guild represents members of the Travelling Showpeople and is a national organisation subdivided into regions. A survey of Travelling Showpeople produced for the North West by 4NW with assistance from The Showmen’s Guild analyses existing supply of pitches but provides little evidence of need. It simply suggests that every one of the 41 authorities in the North West should set aside 1 acre to allow for 10 plots each and that would sort out all requirements.</p> <p>12 A further study “The North West’s Travelling Show people’s Current Base Location, Preferred Base Locations and Operating Patterns” 4NW, 2008 is based on data collected in the Showmen’s Guild Travelling Preference survey (Autumn 2007).</p> <p>13 400 plus surveys were sent out and 110 were returned. The study identified that there were no travelling showpeople currently based in South Ribble. The report looked at where Travelling Showpeople if given a choice would prefer to be based in comparison to their current base. The report identified that given a choice, 2.5% of the Travelling Showpeople surveyed identified a single preference for South Ribble. In relation to those that identified a number of preferred locations 3.2 % chose South Ribble.</p> <p>14 This study identified there are small proportions of travelling show people based in Chorley Borough (0.1-2%).</p> <p>15 3.1 to 6% indicated a single preference to be in Chorley. Those that chose more than one preferred location (multiple) showed the same percentage 3.1 to 6% for Chorley. The report indicates in its comparison of current base to preferred base that Travelling Showpeople operating in the NW would ideally like to be based in Bolton or Preston. Chorley and South Ribble are not identified.</p> <p>16 The report also looked at operating locations i.e. fairs at different intervals of the year. No operating patterns were identified in the Boroughs of Chorley and South Ribble during Dec 2006 – Oct 2007 for Travelling Showpeople.</p> <p>17 However the report concludes there is a definite need for a wider breadth of provision of permanent and temporary pitches across the region. Travelling Showpeople prefer to be based elsewhere i.e. coastal and central districts of the region. Issues of overcrowding and doubling up on existing sites are common therefore provision needs to be improved elsewhere.</p> <p>18 The Showmen’s Guild says what is not reflected in the GTTA study provision is where Travelling Showpeople are now based and in relation to their travelling position where is there a suitable location for them to be based. Travelling Showpeople say they need to be located in more suitable locations to reflect their travelling patterns. Overcrowding on existing sites and doubling up leads to unacceptable conditions and</p>

Organisation:	5. Do you have any comments to make about the supporting text?
	<p>personal requirements (i.e. more room for offspring to marry and have larger caravans).</p> <p>19 It would seem that geographical central locations are favoured and this makes the Central Lancashire authorities a central location with good motorway networks. However there needs to be a judgement on locations."</p>
South Ribble Borough council	
St Helen's MBC	<p>The Government's aim of ensuring equal access to decent and appropriate accommodation options would not appear to be achieved by the distribution proposed, as provision is not required in all authorities.</p>
Warrington Borough Council	<p>In relation to the transit accommodation needs of Travelling Showpeople, it is not clear from the supporting text how these will be met within the region. Paragraph 7 acknowledges that "Travelling Showpeople will stay on legal fairground sites when working, but require secure places to stay whilst travelling with large fairground equipment for up to three to four days between one fair's end and the next fair's start date". Paragraph 7 proceeds to explain that "In response to this an informal network of temporary accommodation (including tolerated stopping places) has developed with some landowners in parts of the region".</p> <p>The supporting text does not however make explicitly clear whether or not this 'informal network' of temporary accommodation is considered sufficient to meet the transient needs of the Travelling Showpeople community throughout the plan period. Clarification on this aspect is required.</p>
West Lancashire District Council	No
Wirral MBC	<p>The supporting text should provide a further explanation of how the figures proposed for individual districts have been arrived at and verified. Further information should also be provided on current working and travelling patterns in support of the figures proposed.</p>

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

The table below shows the verbatim comments received.

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
AGMA	-
Allerdale Borough Council	No
Blackpool Council	No
Cheshire East Council	-
Cheshire West and Chester Council	-
Chorley Borough Council	-
CPRE North West	-
Cumbria County Council.	None other than as already stated in Ques 4
Director of Development Preston City Council	"Additional Information Requested 204NW have been asked to provide local authorities with more information as identified below. 4NW have indicated they will not be able to provide this information before the consultation deadline. <ul style="list-style-type: none"> <li>• More detail on the number and location of fairs</li> <li>• Travelling patterns</li> <li>• How long do fairs last</li> <li>• Planning applications made in Lancashire for Travelling Showpeople pitches</li> <li>• Number of Travelling Showpeople households in the North West</li> <li>• Expansion on Showmens Guild information on pitch criteria and requirements."</li> </ul>
Fylde Borough Council	-
GONW	-
Hyndburn Borough Council	-
Knowsley MBC	The evidence contained within the Merseyside GTAA should be reconsidered.
Lake District National	-

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
Park Authority	
Lancashire County Council	-
Macclesfield Borough Council	-
Northwest Regional Development Agency	-
On behalf of Liverpool and Sefton Councils	No
Sefton MBC	No
South Lakeland District Council.	-
South Ribble Borough Council	<p>"Range of Studies and Evidence</p> <p>5 The Lancashire GTAA 07 indicated a requirement for 9 additional pitches in Lancashire between 2006 and 2016 and identified 0 pitches for Preston South Ribble and Chorley.</p> <p>6 The interim draft RSS policy initially required 21 plots in Preston</p> <p>7 The interim draft RSS policy initially required 9 plots in South Ribble.</p> <p>8 The interim draft RSS policy initially required 14 plots in Chorley Borough. The draft RSS policy (Jan 09) now seeks that Chorley Preston and South Ribble each accommodate 10 plots to 2016 and a further 2 until 2021 which will need to be future proofed so the requirement will be 15 plots in total for each Borough.</p> <p>9 Clearly the pitches for Preston City, South Ribble and Chorley (2007 –2021), and compared with the Lancashire GTAA suggested requirement of 0 plots, is an astonishing level of new provision. So is the requirement to require 75 additional plots for travelling show people in Lancashire out of a North West total of 285 (26% of NW provision).</p> <p>10 4NW now say the largest percentage of requirement in the North West is in Greater Manchester but this does not reflect the needs of Travelling Showpeople (TS). 4NW now say the methodology for Travelling Showpeople plots was never driven by the GTTA, the evidence was just a starting point and the option now supported is more equitable distribution that supports the needs of the Travelling Showpeople. The GTTA also failed to ask about overcrowding and doubling up.</p> <p>11 The Showmen’s Guild represents members of the Travelling Showpeople and is a national organisation subdivided into regions. A survey of Travelling Showpeople produced for the North West by 4NW with assistance from The Showmen’s Guild analyses existing supply of pitches but provides little evidence of need. It simply suggests that every one of the 41 authorities in the North West should set aside 1 acre to allow for 10</p>

Organisation:	6. Do you have any additional information or evidence that you would like 4NW to consider?
	<p>plots each and that would sort out all requirements.</p> <p>12 A further study "The North West's Travelling Show people's Current Base Location, Preferred Base Locations and Operating Patterns" 4NW, 2008 is based on data collected in the Showmen's Guild Travelling Preference survey (Autumn 2007).</p> <p>13 400 plus surveys were sent out and 110 were returned. The study identified that there were no travelling showpeople currently based in South Ribble. The report looked at where Travelling Showpeople if given a choice would prefer to be based in comparison to their current base. The report identified that given a choice, 2.5% of the Travelling Showpeople surveyed identified a single preference for South Ribble. In relation to those that identified a number of preferred locations 3.2 % chose South Ribble.</p> <p>14 This study identified there are small proportions of travelling show people based in Chorley Borough (0.1-2%).</p> <p>15 3.1 to 6% indicated a single preference to be in Chorley. Those that chose more than one preferred location (multiple) showed the same percentage 3.1 to 6% for Chorley. The report indicates in its comparison of current base to preferred base that Travelling Showpeople operating in the NW would ideally like to be based in Bolton or Preston. Chorley and South Ribble are not identified.</p> <p>16 The report also looked at operating locations i.e. fairs at different intervals of the year. No operating patterns were identified in the Boroughs of Chorley and South Ribble during Dec 2006 – Oct 2007 for Travelling Showpeople.</p> <p>17 However the report concludes there is a definite need for a wider breadth of provision of permanent and temporary pitches across the region. Travelling Showpeople prefer to be based elsewhere i.e. coastal and central districts of the region. Issues of overcrowding and doubling up on existing sites are common therefore provision needs to be improved elsewhere.</p> <p>18 The Showmen's Guild says what is not reflected in the GTTA study provision is where Travelling Showpeople are now based and in relation to their travelling position where is there a suitable location for them to be based. Travelling Showpeople say they need to be located in more suitable locations to reflect their travelling patterns. Overcrowding on existing sites and doubling up leads to unacceptable conditions and personal requirements (i.e. more room for offspring to marry and have larger caravans).</p> <p>19 It would seem that geographical central locations are favoured and this makes the Central Lancashire authorities a central location with good motorway networks. However there needs to be a judgement on locations."</p>
South Ribble Borough council	-
St Helen's MBC	Concern that the primacy of the GTAA seems to have been diluted by this new evidence and where does that leave us with future GTAA's if the methodology was seen to be flawed
Warrington Borough	-

<b>Organisation:</b>	<b>6. Do you have any additional information or evidence that you would like 4NW to consider?</b>
Council	
West Lancashire District Council	No
Wirral MBC	-

## 7. Any other comments?

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>7. Any other comments?</b>
AGMA	<p>4.3 AGMA also has significant concerns about the delivery of the proposed policy requirements and the implications that this may have for the progress of LDFs. In particular, there are capacity and policy constraints, and issues of sequence of delivery, that will need to be considered by LPA's as they take their LDF's forward and these concerns need to be considered by 4NW when the proposed policy is revised to reflect concerns raised by those making representations.</p> <p>4.4 In terms of Policy L7 (Travelling Showpeople), AGMA broadly supports the aim of having a more equitable distribution of provision across the region and within sub-regions. However, although 4NW have tried to redistribute some of the need out of GM to other sub-regions, it is felt that the Partial Review provides an opportunity to do more. It is clear that there are other sub-regions that have little or no provision currently and are unlikely to have any significant share by 2016 under the current drafting of the Policy.</p>
Allerdale Borough Council	No
Blackpool Council	It needs to be made clear in the Policy or in the supporting text (in line with 4NW comments at the Workshops) that the identification of sites for TSP is seen as a "strategic" need which can be met in the Core Strategy rather than Site Allocation or other DPDs. Delivery and implementation of Policy L7 will be supported by such clarification.
Cheshire East Council	-
Cheshire West and Chester Council	-
Chorley Borough Council	-
CPRE North West	-

<b>Organisation:</b>	<b>7. Any other comments?</b>
Cumbria County Council.	None other than as already stated in Ques 4
Director of Development Preston City Council	<p>Conclusion</p> <p>21 In the absence of clear evidence of substantial need, Preston City, South Ribble and Chorley Councils reject the high-proposed allocations of plots for travelling show people in the Central Lancashire area.</p>
Fylde Borough Council	-
GONW	-
Hyndburn Borough Council	<p>In respect of the existing provision of Travelling Showpeople's 'plots' in Hyndburn quoted in the Interim Draft Policy L7 Table 7.3 i.e. 54, this figure appears to be at variance with information contained in other documents. 'The North West's Travelling Showpeople's Current Base Location, Preferred Base Locations and Operating Patterns' briefing from 4NW based on data collected by the Showmen's Guild clearly suggests that the current provision of plots for Travelling Showpeople in Hyndburn does not offer the required provision in terms of permanent pitches – see text on page 15 and Appendix 1.</p> <p>The Lancashire GTAA (page 84 and Table 33 page 125) states that there are 18 pitches for Travelling Showpeople in Hyndburn (equal to the number of pitches for which planning permission was given in 2001) and goes onto say that the Showmen's Guild states that this provision equates to space for 54 caravans. The GTAA goes onto quote information from The Showman's Guild report 'The Accommodation Situation of Showmen in the North West' June 2007 that makes reference to the suitability (or not) of the Hyndburn provision. At the time of the GTAA 16 out of the 18 pitches were vacant – the Showman's Guild say this maybe due to 2 factors:-</p> <ol style="list-style-type: none"> <li>1. The site's unsuitable location in relation to the pattern of fairs in the region makes it unattractive as an accommodation or storage base and</li> <li>2. The short tenure and pitch rental nature of the site i.e. short stays rather than permanency) makes it unattractive to Showmen whose cultural aspirations would be to buy and own their own family pitch. The GTAA concludes on page 123 that "within the Lancashire Study Area, if the status quo remains, it is the view of the research team that current pitch vacancies on this site should not be seen as a source of potential supply". From a Hyndburn viewpoint we are concerned that the GTAA research team are of the view that 'the current pitch vacancies on this site should not be seen as a source of potential supply.' When planning permission was granted on the Burnley Road site, on appeal in Nov 2001, the Inspector concurred with the applicant's view that there was a real need for permanent quarters for Showpeople in the area.</li> </ol> <p>In light of the above we are uncertain as to whether the current authorised provision figure of 54 in Table 7.3 of the Interim Draft Policy L7 is the correct figure? We are of the view that it should be 18 to reflect the number of pitches that were granted planning permission. This is also consistent with 'pitches' that are used to indicate current authorised provision in the Accommodation for G&amp;T Consultation rather than number of caravans.</p>
Knowsley MBC	-

Organisation:	7. Any other comments?
Lake District National Park Authority	-
Lancashire County Council	-
Macclesfield Borough Council	-
Northwest Regional Development Agency	-
On behalf of Liverpool and Sefton Councils	no
Sefton MBC	No
South Lakeland District Council.	-
South Ribble Borough Council	Conclusion 21 In the absence of clear evidence of substantial need, Preston City, South Ribble and Chorley Councils reject the high-proposed allocations of plots for travelling show people in the Central Lancashire area.
South Ribble Borough council	<p>19 4NW have been asked to provide local authorities with more information as identified below. 4NW have indicated they will not be able to provide this information before the consultation deadline.</p> <ul style="list-style-type: none"> <li>• More detail on the number and location of fairs</li> <li>• Travelling patterns</li> <li>• How long do fairs last</li> <li>• Planning applications made in Lancashire for Travelling Showpeople pitches</li> <li>• Number of Travelling Showpeople households in the North West</li> <li>• Expansion on Showmens Guild information on pitch criteria and requirements.</li> </ul> <p>Conclusion 20 In the absence of clear evidence of substantial need, South Ribble Borough Council rejects the high-proposed allocations of plots for travelling show people in the Borough.</p>
St Helen's MBC	-
Warrington Borough Council	<p>In relation to temporary sites, it is understood that these are used between shows and are necessary because there is a gap between the pull down time allowed by one authority and the set up time allowed by the next. Unless needed because of distance, we could reduce the number of transit sites by having a protocol that commits authorities to work together to agree extended pull down and set up times which join up. The supporting text of Policy L7 could make reference to this or similar approaches to help advocate more proactive cross boundary working relationships.</p>

<b>Organisation:</b>	<b>7. Any other comments?</b>
West Lancashire District Council	No
Wirral MBC	-