

**WEST MIDLANDS RSS INTERIM POLICY STATEMENT:
Provision of New Accommodation for Gypsies,
Travellers and Travelling Showpeople**

TECHNICAL NOTE JANUARY 2010

1. This note outlines the process of developing the pitch and plot allocations for Gypsies, Travellers and Travelling Showpeople included in the West Midlands RSS Interim Policy Statement. Its starting point is the RSS Revision Phase 3 Options Consultation in summer 2009. It deals in turn with residential pitch requirements for Gypsies and Travellers 2007-2017, transit pitch requirements for Gypsies and Travellers 2007-2017, and plot requirements for Travelling Showpeople 2007-2012.
2. The main stages involved in each case were:
 - Consideration of the Options Consultation (report by URSUS Consulting) and development of a 'preferred option' in the form of a First Draft Interim Policy Statement.
 - Consultation on this First Draft via meetings of Policy Leads and RSS Co-ordination Group (4 November 2009), Gypsy, Traveller and Travelling Showpeople Reference Group (11 November 2009) and a request for written responses addressed to all local authority Chief Executive Officers (closing date 30 November 2009).
 - Summary feedback of the results of this consultation to Policy Leads and RSS Co-ordination Group (4 December 2009) and Regional Planning and Environment Executive (15 December 2009).
 - Further technical work to assist the consideration of consultation responses and to suggest limited amendments to the Draft Interim Policy Statement.
 - Presentation of the Second Draft Interim Policy Statement at an RSS Reference Groups seminar on 5 January and at Policy Leads and RSS Co-ordination Group meetings on 6 January 2010.

Residential Pitch Requirements for Gypsies and Travellers 2007-2017

Regional Residential Pitch Total

3. The Options Consultation total pitch requirement was 939, based on GTAA findings which had been slightly adjusted to ensure consistency of time frame. Consultation opinions differed on whether the total was appropriate. 26% agreed with the figure, 31% thought it was too low, 30% that it was too high, and 13% made some other comment. Gypsy and Traveller individuals were most likely to think the figures too low on the basis of their own and their children's experiences. District and parish councils from across the region, but particularly from Staffordshire, were most likely to think the figures too high arguing that they were based on aspirations rather than need for site accommodation.

4. The First Draft Interim Policy Statement retained the 939 total as the most robust figures available (GTAA-based). In support, the Sustainability Appraisal notes that the provision of 939 extra pitches will be vital to ensuring that the Gypsy and Traveller community has access to decent housing, services and opportunities, and that issues around poverty and deprivation, health inequalities and poor health are addressed.

5. Two responses to the subsequent 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. Remedying these errors has 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 raises Stratford's need where it arises requirements 2007-2017 by 7 (from 45 to 52).

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

Allocation of Requirements to Local Authorities

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

- Option 1 : need where it arises from the GTAAs
- 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

8. 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.

9. 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 shows:

- There are fundamental and irreconcilable differences in preferences between different categories of consultee over whether a redistributive Option is 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 is unacceptable.

10. The Sustainability Appraisal notes that differences between pitch requirements in the Options are relatively small both at sub-regional and local authority level; all have the same overall regional total. Despite difficulties in appraising the relative effects and implications of the three Options, it concludes 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 are 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 cannot take account of sustainability in the sense of 'deliverability' or the extent to which the Options reflect Gypsy and Traveller preferences and are 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.

11. In the context of such polarisation of consultation opinion and lack of consensus on which Option is 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.

12. The principles underlying the proposed allocation of residential pitches between local authorities are:

- The regional total of additional pitches 2007-2017 (939 for First Draft and 938 for Second Draft), based primarily on the GTAAs, 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 GTAAs is the starting point. This is in accord with Gypsy and Traveller community wishes and those of some authorities, as expressed in the Consultation.
- A limited redistribution of pitches has been undertaken to reduce the number of additional pitches to be provided in some districts where Option 1 requirements are particularly high. The primary objective is, where possible, to increase deliverability by reducing the task for districts which have already made significant provision. An ideal maximum additional requirement has been 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. Annex 1 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).

13. 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 in paragraph 5 above affecting the need where it arises pitch requirements for North Warwickshire and Stratford on Avon. This affects 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 CEO consultation from Coventry which expressed reasoned objections to First Draft pitch 'imports'.

14. Table 1 (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. The allocation and its rationale is described in greater detail below.

15. Map 1 shows the basic geography of residential pitch requirements (need where it arises) across the region. Authorities with requirements below 14 and above 42 pitches are distinguished in line with the principle set out in paragraph 12 above. Unshaded authorities have need where it arises residential requirements between 14 and 42 pitches.

16. The map identifies the authorities where pitches must be re-allocated to make reductions to achieve the 42 pitch maximum, and helps identify the areas to be considered as potential recipients of re-allocated pitches because of low need where it arises requirements. Low requirements on this basis tends to correspond broadly to the level of current pitch provision. Map 2 which distinguishes relatively high and low providers in relation to the regional average provision of around 37 pitches.

Table 1 : Derivation of Preferred Option Allocation of Additional Residential Pitch Requirements : Draft 1 and Draft 2				
Local authority	Consultation Option 1	Provision in Regional Policy Statement		Derivation Draft 1 Reason for change between Draft 1 and Draft 2
		Draft 1	Draft 2	
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		Derivation Draft 1 <i>Reason for change between Draft 1 and Draft 2</i>
		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		Derivation Draft 1
		Draft 1	Draft 2	<i>Reason for change between Draft 1 and Draft 2</i>
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		Derivation Draft 1
		Draft 1	Draft 2	<i>Reason for change between Draft 1 and Draft 2</i>
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>

Local authority	Consultation Option 1	Provision in Regional Policy Statement		Derivation Draft 1 <i>Reason for change between Draft 1 and Draft 3</i>
		Draft 1	Draft 2	
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>
West Midlands Region	939	939	938	Regional total requirement maintained <i>Reduction of 1 pitch – see net effect of changes in North Warwickshire and Stratford on Avon</i>

17. A further factor taken into account, where possible, is 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 Landuse Consultants (ref). The extent of opportunity footprint on unconstrained land in hectares is shown alongside other basic information in Annex 2.

18. 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 has been no redistribution because of the large spatial size of these authorities and the extent of unconstrained land available.
- South Staffordshire : South Staffordshire has 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 are 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 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 are 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 are 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 rationale for the Local Authorities' GTAA in this area. Diversions in excess of 3 pitches to Warwick, Coventry and North Warwickshire are 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 has not been 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.

19. This pattern of re-allocation is summarised in Map 3 which shows the flows between 'exporting' and 'importing' authorities. Table 2 shows the very limited number of areas where the basic principles of allocation (see paragraph 12) have not been met.

Table 2 : Authorities where Allocation Principles are Not Met	
Local authority	Comment
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.

Transit Requirements for Gypsies and Travellers

20. 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.

21. 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 and 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.

22. 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 has identified a nil need for provision (two districts only) authorities are encouraged to work towards establishing some form of transient provision and contribute to the creation of a comprehensive transitory network across the region.

23. 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.

24. 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 GTAAs. 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 has been 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.

25. The consequence of these amendments is to reduce the regional transit pitch requirement from 244 to 224 pitches. The principle of distribution remains the need where it arises approach from the GTAAs.

Plot Requirements for Travelling Showpeople

26. The regional plot requirements for Travelling Showpeople in the Consultation Options was taken directly from the GTAAs. There was some agreement amongst those responding to the Consultation that the number of plots allocated for Travelling Showpeople (118) during the five year period 2007-2012 will 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.

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

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

28. 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) has been incorporated in all Drafts of the Interim Policy Statement.

29. 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.

30. 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 are retained in the Interim Policy Statement. The Midland Section Showmen's Guild has expressed its complete support for the Interim Policy Statement.

31. Two issues emerged in the subsequent consultation processes:

- 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 has not been 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 has been taken into account by an explanatory footnote to the table of plot requirements in the Interim Policy Statement and Policies relating to relocations.

Annex 1 : Justification for 14 Pitches Minimum and 42 Pitch Maximum Allocations

In Consultation Option 3, a minimum 14 pitch allocation 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 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 GTAA's (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.

Annex 2 : 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
	West Midlands Region	1,094	938	938	19,515	Neutral