

WM RSS Revision Phase 3: Technical Background Report on the Development of Options for Pitch Provision for Gypsies and Travellers and Travelling Showpeople 2007-2017

1. The West Midlands Regional Spatial Strategy is being revised in three Phases. Matters being revised in Phase 3 are:
 - Rural Services: To identify and prioritise the services that are critical to the sustainability of rural communities, and to identify mechanisms for promoting their provision;
 - Communities for the Future: To identify the number of pitches required for Gypsies, Travellers and Travelling Showpeople;
 - Culture, Sport and Tourism: To improve the provision of, and access to, quality cultural and sports assets and provide opportunities to increase the rate of participation / attendance in cultural activities;
 - Environment: To further develop environmental policies in the RSS, including flood risk, air quality, renewable energy and Green Belt;
 - Minerals: To develop policies on safeguarding mineral resources and the future supplies of construction aggregates and brick clay.

2. To assist in Communities for the Future element, a Gypsy and Traveller Reference Group was established to offer advice to the Regional Assembly. The membership is shown in Appendix 1. The Centre for Urban and Regional Studies (University of Birmingham) and the Salford Housing & Urban Studies Unit (University of Salford) were commissioned to provide technical advice and assistance on this part of the RSS Revision.

3. This report outlines the technical work undertaken in order to establish an estimate of the pitch/plot requirements for Gypsy, Traveller and Travelling Showpeople communities. For clarity it is in two main sections:
 - Estimating numerical regional pitch/plot requirements
 - Generating Options for the allocation of pitch/plot requirements at local authority level.

4. The geographical diversity of the West Midlands Region is significant in this regard. In particular, it is important to note the extreme contrast between the highly urbanised conurbation authorities and those of the largely rural west of the Region. Except in parts of the rural west, nowhere in the Region is far distant from good communication routes.

Estimating Regional Pitch/Plot Requirements

5. In accordance with Government requirements, in March 2007 the Regional Assembly submitted to Communities and Local Government an *Interim Regional Statement on Gypsy & Traveller Policy* followed in November 2007 by a *Travelling Showpeople Supplement*. Both addressed the estimated requirement for additional pitch/plot provision on the basis of secondary information, with the intention that both documents would be superseded by the RSS Revision once the findings of the local authorities' Gypsy and Traveller Accommodation Assessments (GTAAAs) became available.

6. The 6 sub-regional Gypsy and Traveller Accommodation Assessments (GTAAs), commissioned by the local authorities of the West Midlands, were completed between 2007 and 2008. They form the basis of the technical work contributing to the Phase 3 Revision. Table 1 overleaf shows the local authorities covered by each, and also shows who carried out the study.

Overview of Gypsy and Traveller Accommodation Assessments

7. The team from the Universities of Birmingham and Salford examined the GTAAs and produced an *Overview* report¹. This report assessed the study methods used, their implications for robustness and the reliability of findings of the GTAAs, and set out the resulting pattern of requirements for residential and transit pitches for Gypsies and Travellers and plots for Travelling Showpeople. 'Requirements' are defined as the number of additional pitches or plots to be provided in order to meet assessed 'need' for pitches/plots net of any estimated 'supply' arising during the relevant planning period.

8. As a result of this desk-based benchmarking exercise, the *Overview* concluded that the survey methods and ways in which pitch requirements were calculated are sufficiently consistent and robust for the GTAA findings to be relied upon to give a regional picture of requirements. While the GTAAs differ in detail in the way pitch requirements have been estimated – reflecting non-prescriptive guidance from CLG – there appear to be no significant methodological gaps or errors which should (or realistically could) be remedied prior to consideration of the estimates in the RSS Revision.

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

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

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

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

¹ *Overview of Gypsy and Traveller Accommodation Assessments* (May 2008)

Table 1 : Summary of West Midlands GTAAs		
GTAA	Local authorities covered	Lead consultant
North HMA	East Staffordshire, Newcastle-under-Lyme, Stafford, Staffordshire Moorlands, Stoke-on-Trent	SHUSU (University of Salford)
Southern Staffordshire/Northern Warwickshire (A5 Corridor)	Cannock Chase, Lichfield, South Staffordshire, Tamworth, North Warwickshire, Nuneaton & Bedworth, Rugby	SHUSU (University of Salford)
West	Bridgnorth, North Shropshire, Oswestry, Shrewsbury & Atcham, South Shropshire, Herefordshire, Telford & Wrekin (and Powys)	CURS (University of Birmingham)
South HMA	Bromsgrove, Malvern Hills, Redditch, Worcester, Wyre Forest, Wychavon, Wyre Forest, Stratford-on-Avon, Warwick	In-house survey; report by Rupert Scott
Black Country	Dudley, Sandwell, Walsall, Wolverhampton	Fordham Research
Birmingham/Coventry/Solihull	Birmingham, Coventry, Solihull	CURS (University of Birmingham)

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

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

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

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

Table 2 : Summary of Regional Pitch/Plot Requirements Established in the <i>Overview</i> Report	
Residential pitches for Gypsies and Travellers Years 1-5	669 pitches
Residential pitches for Gypsies and Travellers Years 6-10	276 pitches
Transient pitches for Gypsies and Travellers Years 1-5	243 pitches
Plots/yards for Travelling Showpeople Years 1-5	118 plots

Section 4(4) Advice from Strategic Authorities

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

14. The Centre for Urban and Regional Studies was asked to bring together and assess Advice submitted on Gypsy, Traveller and Travelling Showpeople issues. A report² was produced in August 2008 summarising the Advice and identifying outstanding issues to be resolved.

² *Note On Section 4(4) Advice, Housing: Gypsies, Travellers And Travelling Showpeople* (August 2008)

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

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

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

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

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

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

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

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

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

- Appendix Table A2 of the *Overview* report did not break down the figure of 10-12 pitches across the Black Country to local authority level. It has been assumed that each of the four authorities had a requirement of 3 transient pitches (12 in all). This has the effect of raising the regional total by 1 pitch since the mid-point of the range (11 pitches) had been used initially in calculating the regional total.

- It has been assumed that the requirements arise over the full 10 year period 2007-2017. The GTAA's are not always explicit about time periods in relation to transient pitches.

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

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

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

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

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

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

- The South West Regional Assembly had consulted on a single pitch distribution of requirements for residential and transit pitches for Gypsies and Travellers. This was broadly on a basis of 'need where it arises' as evidenced by the sub-regional GTAA's and local authority advice. The indications are that the West Midlands would not be permitted to consider one Option only.
- In the East of England a redistributive Option was developed to maximise choice for Gypsies and Travellers and increase deliverability. A minimum of 15 residential pitches for Gypsies and Travellers was allocated to every local authority, top-sliced from the assessed requirements of the authorities with the highest pitch requirements (transit needs and plots for Travelling Showpeople were not considered at this stage). This formed the basis of Option 2 in the consultation; Option 1 was on a 'need where it arises' basis. Following public consultation, the redistributive Option 2 was agreed as the Preferred Option. (Subsequently the report of the Panel of the Examination in Public has accepted in principle this redistributive approach, as has the Secretary of State's Proposed Changes to the Draft Revision of the RSS.)

- The South East of England Regional Assembly was also developing more redistributive Options through Section 4(4) Advice which asked local authorities, within a GTAA or county-wide grouping, to suggest a distribution of residential pitch requirements for Gypsies and Travellers which takes account of planning opportunities and constraints. Most authorities responded and provided an Option B along these lines in addition to Option A (need where it arises). The Regional Assembly itself developed further Options again based around planning opportunities and constraints permitting redistribution across the region; four Options were consulted on. (Subsequently, following sustainability appraisal and consultation, a variant of the wider redistributive approach has been agreed as the Preferred Option.)

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

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

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

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

Developing Option 2 (planning constraints and opportunities)

25. As with other forms of development, finding suitable land for provision of Gypsy and Traveller sites is an important consideration. ODPM Circular 01/2006 discusses issues relating to different forms of planning considerations as they might affect site provision in rural areas and as part of major developments. Option 2 is designed to take account of the extent of suitable land in a district in allocating pitch requirements. Very broadly, districts with

larger amounts of 'suitable' land might expect to receive a higher pitch allocation than a district with very little 'suitable' land. 'Suitability' can be defined as encompassing both freedom from constraints and having opportunities to access services.

26. The Regional Assembly commissioned Land Use Consultants to map planning constraints and opportunities to help in the development of Option 2. Their final report was submitted in December 2008³. A list of the maps produced is included in Appendix 4. These maps are available for inspection from the Regional Assembly.

27. The **constraints** mapped were:

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

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

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

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

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

Circular 01/2006, it was decided to assume that 5% of Green Belt land is considered to be potentially available in each affected district and this amount of land is added to unconstrained land.

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

31. Planning **opportunities** were defined as:

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

These were mapped (see Appendix 4).

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

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

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

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

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

Method of Calculating Option 2 Scenario

There are three steps in the methodology:

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

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

Table 3 : Effect of Option 2 Scenarios at ‘County’ Level : Differences from the Option 1 Distribution					
Area	Option 2 Scenarios				
	A	B	C	D	E
Shropshire/Herefordshire/Telford & Wrekin	+68	+41	-27	+33	+81
Staffordshire/Stoke on Trent	-14	+1	-5	-15	0
Warwickshire	-12	-15	-18	-24	-30
Worcestershire	-8	-2	-16	-20	-2
Conurbation	-34	-25	+67	+27	-49

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

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

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

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

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

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

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

40. The scenarios relate to the 5 year period 2007-2012⁴, working on a base (need where it arises – Option 1) requirement figure of 660 pitches across the Region. At this stage the district councils of Shropshire were included as separate entities – they were amalgamated in later analyses in recognition of unitary status for the county from April 2009. The seven scenarios developed are described below, with a brief account of their rationale and implications.

- **Scenario A** : One of the arguments sometimes made is that distributions of requirements on a 'need where it arises' basis are 'unfair' because they 'penalise' the local authorities which have made provision and benefit those which have made no provision and therefore appear to have no additional need arising. Scenario A was introduced to show the effect of taking a logical 'maximum fairness' argument by allocating inversely to the level of current provision using the Caravan Count figures from January 2008 for caravans on authorised social and private sites as a proxy. Wychavon, the local authority with the highest level of current provision, is set at zero and other allocations are set in relation to this inversely so that the authorities with the lowest current provision receive the highest future allocation. The arithmetic of the calculation means that authorities with no authorised provision receive an allocation of 23 pitches. This has a major redistributive effect, both at local and sub-regional levels. It is likely to be judged unsustainable, since it totally ignores Gypsy and Traveller preferences. It would probably not be deliverable and would

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

lead to continuing unauthorised encampments and developments in the areas where need arises and where little or no provision is planned. This scenario was rejected as unrealistic.

- **Scenario B** : This scenario tested another possible interpretation of 'fairness' by giving every authority a similar allocation. Each authority receives an equal allocation regardless of current provision or assessed need. Authorities with a base (need where it arises) requirement of up to 20 pitches receive an allocation of 19 pitches, others receive an allocation of 20. Although this scenario has the effect of increasing the potential choice of locations open to Gypsies and Travellers, it is unlikely to be sustainable or deliverable because it ignores Gypsy and Traveller preferences for living in areas of major settlement at present. Again it could lead to continuing unauthorised development of sites in 'popular' areas. This scenario was rejected as unrealistic.
- **Scenario C** : Each authority receives an allocation of at least 10 pitches. The pitches 'diverted' into these authorities are subtracted from the base (need where it arises) requirements of all other authorities in proportion to their base requirement so that those with the highest base requirements lose the most pitches in their allocation. The rationale for ensuring that every local authority makes a minimum provision is to increase choice for Gypsies and Travellers while also increasing deliverability by increasing the number of potential locations for provision. The 10 pitch minimum was set at a level which would allow economic site development and ensure Gypsy and Traveller families would not be isolated in 'new' areas. It also reflects West Midlands geography and pitch requirements. The scenario has two main merits: it ensures that there will be provision in all parts of the region; and it retains a distribution in which authorities with a relatively high requirement on a 'need where it arises' basis still have relatively high allocations thus facilitating retention of existing family links and communities. It implies, however, that some need might be 'diverted' over long distances. While not taken forward immediately, this scenario forms the basis for the currently preferred Option 3 allocation.
- **Scenario D** : This scenario was intended to counter the need for long-distance 'diversion' of need implied by Scenario C. It aims to redistribute pitches more locally. Authorities are brought up to a 10 pitch minimum only where 'excess' pitches can be diverted from an adjoining authority with a base requirement of more than 20 pitches. It is assumed that only a third of base requirements can be exported. West Midlands geography is such that not all authorities can reach a 10 pitch minimum by purely local redistribution, and some of the authorities with the highest requirements cannot divert requirements elsewhere. The scenario is also complex to formulate and explain. It was rejected.

- Scenario E** : This scenario is intended to give weight to Section 4(4) Advice which was sought on different Options. Authorities covered by Section 4(4) Advice which explicitly argued in favour always meeting requirements on a 'need where it arises' basis (Herefordshire, Shropshire and the conurbation authorities) retain their base (need where it arises) requirements. Elsewhere pitches are redistributed as in Scenario C so that none of these authorities has an allocation of less than 10 pitches. It is less redistributive than Scenario C both because some authorities in the conurbation retain very low pitch requirements, and Herefordshire, which has the highest 'need where it arises' requirement retains all its pitches. This scenario was taken forward to the RSS Gypsy and Traveller Reference Group as moderately redistributive, in line with local authority preferences and therefore more deliverable. It was also felt this scenario indicated that the Assembly had taken notice of the Advice offered.
- Scenario F** : Under scenario F half of requirements are allocated according to the base (need where it arises) distribution. The other 50% is allocated in proportion to the district's share of total regional housing proposals (RSS Phase 2 Revision preferred option, and Black Country Core Strategy Preferred Option). There are three arguments in favour of aligning an element of the pitch allocation with bricks and mortar housing development proposals: it reflects the desire to mainstream Gypsy and Traveller site provision; it maximises potential for sites to be provided in conjunction with major housing developments; and it might be seen to reflect patterns of employment opportunities for Gypsies and Travellers. However, allocating 50% scenario produces a major shift from the more rural areas of the region primarily towards the conurbation authorities. The extent of this shift in pitch allocations away from the need where it arises base suggests that this scenario would be both unsustainable and undeliverable, not least because of land values. Unauthorised development might continue in more rural areas.
- Scenario G** : This scenario sought to mitigate the major and unrealistic redistributive effect of Scenario F by reducing the proportion of pitch requirements allocated in line with regional housing proposals. It is similar to Scenario F, except that 75% of requirement is allocated in line with the base (need where it arises) distribution and 25% according to the proportion of regional housing proposals. The redistributive effect is less marked, but still from broadly rural areas to the conurbation. This scenario was taken to the RSS Gypsy and Traveller Reference Group for comment.

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

scale, they all have quite significant effects at the level of individual local authorities.

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

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

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

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

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

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

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

from other authorities across the Region such that those authorities with the highest Option 1 (need where it arises) allocation lose most pitches. This has been taken forward as the preferred formulation of Option 3.

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

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

- First, the authorities with 'need where it arises' requirements less than 14 are identified. There are eight such authorities (Lichfield, Staffordshire Moorlands, Tamworth, Warwick, Bromsgrove, Redditch, Coventry and Sandwell). Together, these authorities have 'need where it arises' requirements for 42 pitches compared with the 112 pitches required to give the 14 pitch minimum. This means that 70 pitches (112 minus 42) must be diverted from elsewhere to produce the minimum allocation in these authorities. Each of these eight authorities has a 14 pitch allocation in Table 6.
- The second step is to calculate how many pitches are required on a 'need where it arises' basis in the authorities where such requirements are equal to or greater than the minimum of 14 pitches. This total is 897 (939 total requirement less 42 pitches attributable to the authorities under the minimum threshold).
- The third step is to 'divert' 70 pitches to the eight authorities with less than the 14 pitches required on a 'need where it arises' basis. This is done pro rata to the level of 'need where it arises' requirements. Each 'exporting' authority's share of the 70 diverted pitches is calculated according to its share of the 'need where it arises' requirement of 897 calculated in step 2. This is then subtracted from the 'exporting' authority's 'need where it arises' requirement. For example, South Staffordshire has a 'need where it arises' requirement of 50 pitches, which represents roughly 5.6% of the total requirement of 897 pitches. 5.6% of 70 is just under 4 which is the amount by which the South Staffordshire 'need where it arises' requirement is reduced in Table 6 (50 minus 4 = 46).

Table 6 : Preferred Option 3 : Pitch Requirements at District Level and Comparison with Option 1			
Local authority	Pitch requirements 2007-2017		Difference between Options 1 and 3
	Option 1	Option 3	
Staffordshire			
Cannock Chase	35	32	-3
East Staffordshire	15	14	-1
Lichfield	11	14	+3
Newcastle-under-Lyme	20	19	-1
South Staffordshire	50	46	-4
Stafford	37	34	-3
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
Warwickshire			
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	27	-2
Rugby	66	61	-5
Stratford-on-Avon	45	41	-4
Warwick	13	14	+1
Worcestershire			
Bromsgrove	3	14	+11
Malvern Hills	33	30	-3
Redditch	0	14	+14
Worcester	22	20	-2
Wychavon	66	61	-5
Wyre Forest	44	41	-3
Metropolitan districts			
Birmingham	19	18	-1
Coventry	3	14	+11
Dudley	21	19	-2
Sandwell	3	14	+11
Solihull	26	24	-2
Walsall	39	36	-3
Wolverhampton	36	33	-3
Unitary authorities			
Herefordshire	109	100	-9
Shropshire	93	86	-7
Stoke-on-Trent	40	37	-3
Telford & Wrekin	34	31	-3
West Midlands	939	939	0

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

- It means that there will be authorised provision in all parts of the Region, thus increasing potential choice for Gypsies and Travellers.

- It retains a distribution in which authorities with relatively high base figures still have relatively high allocations – thus it retains a significant element of ‘need where it arises’ requirement and might be assumed to reflect existing communities and their connections, and desires to retain these links in the future.

48. Its main limitation is the practicalities of delivery. It implies that some requirements might be diverted to distant areas where the Gypsies and Travellers in need may have no connections. In terms of the broad geography of redistribution relative to Option 1 and ‘need where it arises’ requirements:

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

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

Transient Pitches for Gypsies and Travellers

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

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

- There is no known regional precedent for generating Options for transient pitch allocations. The South West included a single ‘need where it arises’ allocation. Neither the East of England nor the South East of England RSS Reviews included an assessment of transit pitch requirements at local authority level so the question of Options did not arise.
- Very little is known, in a research sense, about travelling patterns of Gypsies and Travellers and thus transient pitch needs. It is recognised that there are many motives for travelling (work, visiting family, going to fairs, having a holiday etc) with potentially different locational implications. In this context, it is hard to identify criteria on which to generate alternative pitch distributions for Options.
- One potential criterion is the major road network including motorways. This was mapped as part of the Land Use Consultants work. In the West Midlands, the network is such that no local authority is isolated from a major route of some kind. While this factor may be relevant in

terms of determining the appropriate location of sites at a local level, it fails to discriminate at a strategic level.

- At the South West RSS Review Examination in Public, Gypsy and Traveller representatives argued that transit provision should be made in all local authorities visited by Gypsies and Travellers, and this principle appears to have been accepted by the Panel. In the West Midlands, the amended-GTAA figures already indicate the need for provision in all but two local authority areas.

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

Table 7 : Distribution of Transient Pitch Requirements	
Unitary Authorities: Shropshire Herefordshire Telford & Wrekin Stoke-on-Trent	35 pitches 10 pitches 10 pitches 10 pitches 65 pitches TOTAL
Staffordshire: Cannock Chase DC East Staffordshire BC Lichfield DC Newcastle-under-Lyme BC South Staffordshire DC Stafford BC Staffordshire Moorlands DC Tamworth BC	5 pitches 5 pitches 5 pitches 5 pitches 5 pitches 2 pitches 2 pitches 5 pitches 34 pitches TOTAL
Warwickshire: North Warwickshire DC Nuneaton & Bedworth BC Rugby BC Stratford-on-Avon DC Warwick DC	5 pitches 5 pitches 5 pitches 10 pitches 15 pitches 40 pitches TOTAL
Worcestershire: Bromsgrove DC Malvern Hills DC Redditch BC Worcester CC Wychavon DC Wyre Forest DC	0 pitches 10 pitches 18 pitches 20 pitches 20 pitches 0 pitches 68 pitches TOTAL
West Midlands: Birmingham CC Coventry CC Solihull MBC Dudley MBC Sandwell MBC Walsall MBC Wolverhampton CC	15 pitches 5 pitches 5 pitches 3 pitches 3 pitches 3 pitches 3 pitches 37 pitches TOTAL
West Midlands Region	244 pitches

Plots for Travelling Showpeople

53. Paragraph 16 noted acceptance of the figures and distribution from Appendix Table A2 of the *Overview* report (Appendix 2 of this report) for plot requirements for Travelling Showpeople for the period 2007-2012. This gives

a regional total of 118 plots distributed between local authorities on the basis of 'need where it arises' as evidenced by the GTAAs.

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

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

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

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

57. Thus the plot allocations are based on the following geographical areas: Herefordshire, Shropshire and Telford & Wrekin

⁵ *Regional Spatial Strategy for the South West : Review of Additional Pitch Requirements for Gypsies and Travellers : Examination in Public Report of the Panel*, April 2008. At: <http://www.gos.gov.uk/497666/docs/166217/622079/fullpanelreport>
The Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of State's Proposed Changes – for public consultation July 2008 At: http://gosw.limehouse.co.uk/portal/regional_strategies/drss?pointId=109242
Regional Spatial Strategy Single Issue Review Planning for Gypsy and Traveller Accommodation in the East of England : Examination in Public Report of the Panel, December 2008 At: http://www.gos.gov.uk/goee/docs/Planning/Regional_Planning/808762/ReportfinalrevDec08.pdf
Accommodation for Gypsy and Travellers and Travelling Showpeople in the East of England : The Secretary of State's Proposed Changes to the Draft Revision of the Regional Spatial Strategy and Statement of Reasons, March 2009 At: http://goe-consult.limehouse.co.uk/portal/rss_gt_proposed_changes/gtproposedchanges?pointId=1238086088667

Staffordshire and Stoke on Trent
 Warwickshire
 Worcestershire
 West Midlands conurbation

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

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

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

Table 8 : Distribution of additional Plot requirements for Travelling Showpeople 2007 – 2012		
Sub-region	Option 1	Option 2
Shropshire / Herefordshire / Telford & Wrekin	9 plots	19 plots
Staffordshire / Stoke on Trent	23 plots	23 plots
Warwickshire	1 plot	12 plots
Worcestershire	22 plots	22 plots
West Midlands Conurbation	63 plots	42 plots
Region	118 plots	118 plots

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

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

APPENDIX 2: APPENDIX TABLE A2 OF THE OVERVIEW REPORT

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

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

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

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

EXPLANATORY NOTES

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

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

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

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

Figures used are as follows.

LA	2007 pitches	2007-2012	2012 base	2012-2017
Bromsgrove	18	0	18	3
Malvern Hills	20	26	46	7
Redditch	0	0	0	0
Worcester	20	16	36	6
Wychavon	123	40	163	26
Wyre Forest	59	30	89	14
Stratford	36	34	70	11
Warwick	0	11	11	2

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

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

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

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

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

APPENDIX 4: LIST OF MAPS PRODUCED BY LAND USE CONSULTANTS

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

APPENDIX 5: OPTION 2 SCENARIOS TESTED

The outcome of each scenario (as outlined in paragraph 33) is shown below together with a summary of changes from Option 1 at 'county' level and brief comments.

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

This has the effect:

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

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

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

This has the effect:

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

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

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

This has the effect:

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

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

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

This has the effect:

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

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

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

This has the effect:

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

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

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

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

Alternative Scenarios for the Allocation of Additional Permanent Pitches 2007-2012 between Local Planning Authorities Following Option 3									
No.	Local authority	Base	Scenario A	Scenario B	Scenario C	Scenario D	Scenario E	Scenario F	Scenario G
1	Bridgnorth	5	23	19	10	10	5	5	5
2	North Shropshire	22	15	20	20	20	22	17	19
3	Oswestry	8	21	19	10	10	8	8	8
4	Shrewsbury & Atcham	10	22	19	10	10	10	12	11
5	South Shropshire	18	22	19	16	18	18	13	16
6	Cannock Chase	25	20	20	23	25	23	18	21
7	East Staffordshire	11	22	19	10	11	10	17	14
8	Lichfield	9	23	19	10	10	10	12	10
9	Newcastle-under-Lyme	15	21	19	14	15	14	13	14
10	South Staffordshire	32	15	20	29	29	29	19	26
11	Stafford	22	17	20	20	19	20	20	21
12	Staffs Moorlands	2	23	19	10	10	10	6	4
13	Tamworth	6	23	19	10	6	10	6	6
14	North Warwickshire	12	22	19	11	12	11	9	10
15	Nuneaton & Bedworth	20	18	19	18	20	18	20	20
16	Rugby	48	16	20	43	38	43	34	41
17	Stratford-on-Avon	34	19	20	31	27	31	22	28
18	Warwick	11	23	19	10	11	10	15	13
19	Bromsgrove	0	21	19	10	10	10	2	1
20	Malvern Hills	26	21	20	24	26	24	17	22
21	Redditch	0	23	19	10	10	10	6	3
22	Worcester	16	20	19	14	16	15	18	17
23	Wychavon	40	0	20	36	33	37	28	34
24	Wyre Forest	30	18	20	27	24	28	18	24

Alternative Scenarios for the Allocation of Additional Permanent Pitches 2007-2012 between Local Planning Authorities Following Option 3 Continued									
No.	Local authority	Base	Scenario A	Scenario B	Scenario C	Scenario D	Scenario E	Scenario F	Scenario G
25	Birmingham	16	22	19	14	16	16	54	35
26	Coventry	0	22	19	10	10	0	30	15
27	Dudley	14	20	19	13	14	14	22	18
28	Sandwell	0	21	19	10	8	0	20	10
29	Solihull	17	20	19	15	17	17	15	16
30	Walsall	30	20	20	27	29	30	28	29
31	Wolverhampton	25	20	20	23	17	25	18	22
32	Herefordshire	83	11	20	74	83	83	57	70
33	Stoke-on-Trent	29	19	20	26	24	27	25	27
34	Telford & Wrekin	24	18	20	22	22	22	36	30

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

Two Options were developed and presented to the RSS Gypsy and Traveller Reference Group in December 2008. They are based on Option 3 Scenarios E and G (see Appendix 6) amended to cover the 10 year period 2007-2017 and treating Shropshire as a single entity. They are described as Scenarios E¹⁰ and G¹⁰. The pitch requirement outcomes are as follows.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario E¹⁰			
Local authority	Pitch requirements 2007-2017		Difference Option 1 and Option 3E ¹⁰
	Option 1	Option 3E ¹⁰	
Shropshire	93	93	0
Cannock Chase	35	32	-3
East Staffordshire	15	14	-1
Lichfield	11	14	+3
Newcastle-under-Lyme	20	18	-2
South Staffordshire	50	46	-4
Stafford	37	34	-3
Staffordshire Moorlands	2	14	+12
Tamworth	7	14	+7
North Warwickshire	18	17	-1
Nuneaton & Bedworth	29	27	-2
Rugby	66	60	-6
Stratford-on-Avon	45	41	-4
Warwick	13	14	+1
Bromsgrove	3	14	+11
Malvern Hills	33	30	-3
Redditch	0	14	+14
Worcester	22	20	-2
Wychavon	66	60	-6
Wyre Forest	44	40	-4
Birmingham	19	19	0
Coventry	3	3	0
Dudley	21	21	0
Sandwell	3	3	0
Solihull	26	26	0
Walsall	39	39	0
Wolverhampton	36	36	0
Herefordshire	109	109	0
Stoke-on-Trent	40	36	-4
Telford & Wrekin	34	31	-3
West Midlands	939	939	0

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

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

- Warwickshire loses 12 pitches overall.
- Worcestershire gains 10 pitches overall.

Distribution of Permanent Pitch Requirements 2007-2017 Following Option 3 Scenario G¹⁰			
Local authority	Pitch requirements 2007-2017		Difference Option 1 and Option 3G ¹⁰
	Option 1	Option 3G ¹⁰	
Shropshire	93	86	-7
Cannock Chase	35	30	-5
East Staffordshire	15	20	+5
Lichfield	11	13	+2
Newcastle-under-Lyme	20	19	-1
South Staffordshire	50	40	-10
Stafford	37	34	-3
Staffordshire Moorlands	2	5	+3
Tamworth	7	7	0
North Warwickshire	18	15	-3
Nuneaton & Bedworth	29	29	0
Rugby	66	57	-9
Stratford-on-Avon	45	37	-8
Warwick	13	17	+4
Bromsgrove	3	4	+1
Malvern Hills	33	28	-5
Redditch	0	4	+4
Worcester	22	23	+1
Wychavon	66	56	-10
Wyre Forest	44	35	-9
Birmingham	19	47	+28
Coventry	3	24	+21
Dudley	21	26	+5
Sandwell	3	16	+13
Solihull	26	25	-1
Walsall	39	38	-1
Wolverhampton	36	31	-5
Herefordshire	109	93	-16
Stoke-on-Trent	40	37	-3
Telford & Wrekin	34	43	+9
West Midlands	939	939	0

The resulting geographical pattern of differences from Option 1 is:

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

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

Option 3 Scenario H follows the principles:

- There should be a minimum allocation of 14 pitches across the Region, regardless of the Section 4(4) Advice. Thus Coventry and Sandwell get an increased allocation.
- Apart from this, Section 4(4) Advice on meeting need where it arises is followed. Thus the remaining Conurbation authorities, Shropshire and Herefordshire retain their Option 1 requirements.

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

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

Option 3 Scenario I follows the principles:

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

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

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

Option 3 Scenario J follows the principles:

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

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

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

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

Option 1 : Requirements as identified in the GTAA's with the following assumptions:

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

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

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

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

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