

WEST MIDLANDS REGIONAL ASSEMBLY

Regional Planning & Environment Executive

23rd February 2010

Interim Policy Statement – Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople

1. Purpose of Report

1.1 The purpose of this report is to:

- (a) Update Members on progress towards developing an Interim Policy Statement related to the provision of new accommodation for gypsies, travelers and travelling showpeople and
- (b) Provide an emerging draft of the Interim Policy Statement for consideration and comment.

2. Recommendation

2.1 That Members:

- (a) Note the process and timetable for developing Interim Policy Statement related to the provision of new accommodation for gypsies, travelers and travelling showpeople and
- (b) Consider recommending for approval to the Assembly Board the emerging draft Interim Policy Statement.

3. Background

3.1 Members will be aware that the Government requested in Circulars 01/2006 and 04/2007 that the West Midlands Regional Assembly (WMRA), as the Regional Planning Body (RPB), address the accommodation and wider needs of gypsy, traveller and travelling showpeople communities.

3.2 It was originally intended that this work would be undertaken as part of the Phase Three Revision of the Regional Spatial Strategy (RSS) and submitted to the Secretary of State in January 2010. This is not now possible in the light of new legislation which will replace RSS's and Regional Economic Strategies with a single Regional Strategy for each of the English Regions. The WMRA has therefore agreed with Government

Office for the West Midlands (GOWM) and Advantage West Midlands that this work be progressed through the development of an Interim Policy Statement and submitted to the Secretary of State by 31st March 2010.

- 3.3 GOWM have confirmed that they will give the Interim Policy Statement similar weight to a submitted draft Regional Spatial Strategy and they expect it to carry substantial weight as a material consideration in relation to Local Development Framework examinations and planning enquiries.
- 3.4 Without such a regional framework in place, more detailed site provision policies will be very difficult for local authorities to develop in their Local Development Frameworks. In these circumstances, gypsy site provision would continue to be made on the basis of appeal decisions by planning inspectors rather than addressed through locally agreed patterns of provision.
- 3.5 The development of the attached Draft Interim Policy Statement has been influenced by a number of factors including:
 - Gypsy and Traveller Accommodation Assessments (GTAA's) which were undertaken on a sub-regional basis by local authorities in the West Midlands Region in 2007/08,
 - Responses to the RSS Phase Three Options consultation in Summer 2009, and
 - Responses to further consultation with local authorities and other stakeholders in November 2009.
- 3.6 The attached Draft Interim Policy Statement was carefully considered by the Assembly Board at its meeting on 15th January 2010. The Board recognised that for some authorities, difficult decisions are required in relation to the provision of new accommodation for Gypsies, Travellers and Travelling Showpeople but the Assembly Board resolved to take those difficult decisions regionally before the end of March 2010.
- 3.7 The Assembly Board requested a final round of consultation with local authorities via Chief Executives. This final round of consultation commenced on 22nd January 2010 with a letter to Chief Executives, with responses required by 19th February 2010. In addition to local authorities, the Draft Interim Policy Statement was also circulated to the Gypsy & Traveller RSS Reference Group for comment. A verbal update on responses to the consultation will be provided to RPEE on 23rd February.

- 3.8 Any re-distribution of pitch numbers from one local authority area will necessitate the accommodation of those pitches in at least one neighbouring authority. The Assembly Board therefore requested that any local authority which considered their figures to be too high to negotiate alternative sub-regional solutions with their neighbouring authorities.
- 3.9 RPEE are asked to recommend the Draft Interim Policy Statement – which is attached as Appendix A - for approval by the Assembly Board on 17th March. In the light of RPEE comments and any further evidence arising from the final round of consultation, a revised Interim Policy Statement will be prepared for consideration and final sign-off by the Assembly Board at its 17th March 2010 meeting.
- 3.10 When the Interim Policy Statement has been approved by the Assembly Board, it will be forwarded to the Joint Strategy and Investment Board (JSIB) for ratification at their 23rd March meeting and then forwarded to the Secretary of State by 31st March 2010.

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

WEST MIDLANDS REGIONAL PLANNING BODY

STATUS OF DOCUMENT: Draft Final (4.2 Draft): 8 Jan 2010

1. PURPOSE OF INTERIM POLICY STATEMENT

1.1 The West Midlands Interim Policy Statement has been developed by the West Midlands Regional Planning Body to inform the Local Development Framework (LDF) process. The overall aim is to increase existing rates of delivery on new pitches and plots for Gypsies, Travellers and Travelling Showpeople in the West Midlands within national policy aimed at increasing such provision (see Appendix 1).

2. Scope

2.1 The main scope of the Interim Regional Policy Statement addresses the pitch requirements by District for:

- Residential pitches for Gypsies and Travellers – from 2007 -2017 dealing with undersupply
- Residential pitches for Gypsies and Travellers – from 2017 -2027 giving indicative requirements and
- Transit sites of various types for Gypsies and Travellers.

2.2 The needs of Travelling Showpeople are addressed on a County wide or group of authorities due to the low level of numbers involved and the wider areas of search for this residential and commercial land use.

2.3 The Statement also sets out some supporting policy to facilitate LDF production and further textual advice and guidance.

3. SUMMARY OF ACCOMMODATION ISSUES FOR GYPSIES AND TRAVELLERS AND BENEFITS TO BE REALISED THROUGH INCREASED PROVISION

3.1 Gypsies and Travellers experience the worst health and education status of any disadvantaged group in England. Life expectancy is, for example, 12 years less for women and 10 years less for men than among the settled community. In 2007, 7% of children of Gypsy/Romany origin and 8.4% of Traveller children of Irish Heritage achieved 5 or more A*

to C grades in GCSE or equivalent exams including English and mathematics in England compared to an average of 45.4%. Research has consistently shown a link between such measures of disadvantage and the shortage of good quality Gypsy and Traveller sites.

- 3.2 Gypsies and Travellers without an authorised pitch for their caravans are homeless. Shortage of authorised sites underlies the unauthorised development of sites by Gypsies and Travellers without planning permission, and unauthorised encampments on roadsides, car parks or other pieces of land. Such unauthorised sites provide uncertain and often very poor living conditions for Gypsies and Travellers, disruption and anxiety for settled neighbours, and costs to local authorities in management and enforcement. They exacerbate community tensions and make community cohesion and social inclusion harder to achieve.
- 3.3 There are sound housing, humanitarian, social and welfare reasons for increasing the supply of good quality Gypsy and Traveller sites. The benefits will be felt by Gypsies and Travellers, by members of the settled community and by local authorities. The need for enforcement action in relation to unauthorised sites will be less, and will be more straightforward, if unauthorised sites continue once adequate provision has been made.

4. SUMMARY OF ACCOMMODATION ISSUES FOR TRAVELLING SHOWPEOPLE

- 4.1 Travelling Showpeople are an occupational group who make their living running funfairs and circuses. Traditionally they have travelled between engagements except in winter months when they occupied 'winter quarters' where they lived, and stored, maintained and tested equipment. Changing patterns of trade and lifestyle mean that some Showpeople now travel to more local engagements from a fixed base throughout the year or need to return to base on occasion through the year. Some family members are retired and again occupy a base through the year.
- 4.2 Sites for Travelling Showpeople are sometimes referred to as 'yards' which may be subdivided into 'plots' each occupied by a single family with one or more trailers. A 'plot' is the unit of land occupied by a single nuclear family, and is broadly equivalent to a 'pitch' for Gypsies and Travellers. Plots and yards for Travelling Showpeople normally accommodate both living vehicles and trade equipment which has to be maintained, tested and stored while not in use. The needs of Travelling Showpeople are different from those of Gypsies and Travellers but again a shortage of appropriate sites is leading to accommodation problems

for families and sometimes to problems in carrying out business activities sufficient to threaten livelihoods.

5. CURRENT LEVELS OF PROVISION IN THE WEST MIDLANDS

5.1 In 2007, there were 1,094 authorised pitches for Gypsies and Travellers across the region, mostly for residential rather than transit use. There were 209 plots for Travelling Showpeople. Table 1 shows current provision at local authority level and demonstrates the current uneven spread of provision for both Gypsy and Traveller pitches and Travelling Showpeople plots.

Table 1 : Current Provision of Gypsy and Traveller Pitches and Travelling Showpeople Plots		
Local authority	Gypsy and Traveller pitches	Travelling Showpeople plots
Staffordshire & Stoke:	282	13
Cannock Chase	41	3
East Staffordshire	17	-
Lichfield	2	-
Newcastle-under-Lyme	17	2
South Staffordshire	83	5
Stafford	71	-
Staffordshire Moorlands	1	2
Stoke-on-Trent	50	1
Tamworth	-	-
Warwickshire:	159	12
North Warwickshire	21	-
Nuneaton & Bedworth	36	2
Rugby	66	-
Stratford-on-Avon	36	5
Warwick	-	5
Worcestershire:	240	56
Bromsgrove	18	8
Malvern Hills	20	17
Redditch	-	31
Worcester	20	-

Wychavon	123	-
Wyre Forest	59	-
Birmingham, Black Country, Coventry & Solihull	169	108
Birmingham	10	25 (1 yard)
Coventry	20	-
Dudley	27	10
Sandwell	15	13
Solihull	37	-
Walsall	20	55
Wolverhampton	40	5
Herefordshire, Shropshire, Telford & Wrekin	244	20
Herefordshire	81	-
Shropshire	124	12
Telford & Wrekin	39	8
REGIONAL TOTAL	1,094	209

5.2 National issues of shortage of site accommodation for Gypsies, Travellers and Travelling Showpeople are applicable in the West Midlands. The sub-regional Gypsy and Traveller Accommodation Assessments (with a few slight corrections where further evidence has been provided subsequently) estimated requirements between 2007 and 2017 for 938 additional residential and 224 additional transit pitches for Gypsies and Travellers. They estimated requirements for an additional 118 plots for Travelling Showpeople between 2007 and 2012. These figures are further explained below. There is a need for a significant and urgent increase in the provision of sites for Gypsies and Travellers, and for Travelling Showpeople.

5.3 Against this background, the aims of the Interim Policy Statement are:

1. To increase significantly the number of Gypsy and Traveller pitches across the West Midlands, in order to address existing under-provision as expressed in the sub-regional Gypsy and Traveller Accommodation Assessments (GTAAs).

2. To ensure there are sufficient plots in the Region to meet the accommodation needs of Travelling Showpeople.
3. To ensure that all revised Gypsy and Traveller and Travelling Showpeople policies in the West Midlands Regional Spatial Strategy (WMRSS), Local Development Frameworks (LDFs) and other Regional and sub-regional strategies recognise, protect and ensure a traditional travelling way of life for Gypsies, Travellers and Travelling Showpeople, whilst also respecting the interests of settled communities.
4. To ensure that all Development Plan Documents (DPDs) include fair, realistic and inclusive policies in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople and that the potential for Gypsies, Travellers and Travelling Showpeople to be evicted and thereby become homeless is avoided.
5. To ensure issues of sustainability, both socially and economically for Gypsy and Traveller communities and for the protection of significant environmental landscape and habitat assets, are properly applied.

6. DEVELOPMENT OF AN INTERIM POLICY STATEMENT

- 6.1 The Regional Interim Policy Statement has developed from Phase 3 of the Regional Spatial Strategy Revision. The provision of sites for Gypsies, Travellers and Travelling Showpeople was one of five planning policy areas which formed RSS Revision Phase 3 which commenced in January 2008. Whilst Phase 1 of the RSS Review was completed in full and Phase 2 reached the Secretary of State for confirmation, the third Phase has been expedited according to policy theme as a result of the streamlining of existing Regional structures due to the passage of the Local Democracy, Economic Development and Construction Act 2009 operational from April 2010 onwards.
- 6.2 The West Midlands Regional Assembly (WMRA) and Government Office for the West Midlands (GOWM) decided that a 'Preferred Option' developed within the former statutory framework for Regional Planning for the provision of sites for Gypsies, Travellers and Travelling Showpeople would not be appropriate. However, to ensure the avoidance of a policy vacuum, WMRA and GOWM agreed to formulate a Regional Policy Statement, which will serve as planning guidance, until the 'Strategy for the West Midlands' is confirmed.

6.3 Until the Strategy for the West Midlands has been completed, the status of this Regional Interim Policy Statement for Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople has been confirmed by GOWM as having 'similar weight to a submitted draft RSS'. Discussions with the Planning Inspectorate indicate that the Statement will 'carry weight in both Development Plan Document (DPD) examinations and Planning Inquiries'.

6.4 The Regional Interim Planning Statement was led by WMRA and involved close liaison with local authority colleagues and a wide range of stakeholders, including direct contact with the various Travelling communities across the Region and the (Travelling) 'Showmen's Guild of Great Britain'. The key stages and activities can be summarised:

1. Assembling an evidence base
2. Development of 'Options' for new Regional Planning policy
3. Consultation on 'Options' for new Regional Planning policy
4. Assessment of responses submitted to the RSS Revision Phase 3 Public consultation period
5. Development of a Regional Interim Policy Statement, including further consultation with local authorities and other stakeholders
6. Endorsement and adoption of the Regional Interim Policy Statement

6.5 Appendix 2 gives further details of the activities involved in each stage. A Housing Background paper is also available on the Assembly web site, which provides further explanation of how the 'Options' were developed:

<http://www.wmra.gov.uk/documents/Gypsies%20Travellers%20Trav%20Showpeople%20Background%20Paper%20-%20paride%20-%20V4%2025June.pdf>

7. KEY MESSAGES FROM THE RSS PHASE 3 REVISION CONSULTATION PERIOD

7.1 In developing a Regional Policy Statement, WMRA has had particular regard to the responses submitted to the Public Consultation on Options, along with other comment, contributed from a range of sources, throughout the lifetime of the Phase 3 process

7.2 Key messages from the Options Consultation process in regards to additional Residential pitches for Gypsies and Travellers were as follows:

- Opinions differed on whether the total residential pitch requirements (939 at the time of the Options Consultation –summer 2009) for Gypsies and Travellers were 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 may be based on aspirations rather than need for site accommodation.

- **In the context of such very diverse responses, WMRA decided to retain the 939 additional residential pitches as the planning total for the Region since it was based on the local authorities' Gypsy and Traveller. Following the November 2009 consultation this figure has subsequently been very slightly adjusted in the light of further evidence provided by local authorities to 938 additional pitches.**
 - 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'.
 - 7 out of 10 local authorities preferred a redistributive Option, but this was split between Option 2 (partly influenced by planning opportunities and constraints), Option 3 (redistribution to provide a minimum of 14 additional pitches in every local authority area), and a view that none of the Options was sufficiently redistributive.
 - There was no consensus between local authorities across the Region or within sub-regions on the preferred Option.
 - Accepting the Options preferred by local authorities is incompatible with achieving the regional total of 939 (now 938) 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 as it would not meet evidenced need.
 - In the context of such polarisation in the consultation opinions and lack of consensus on which Option is preferred, WMRA decided to develop a further Option which combines elements of each of the

Options consulted upon, maintaining the commitment to delivering the full 939 (now 938) pitches by 2017, and being as sensitive as possible to the effects and sustainability issues attendant upon developing a further distributive Option.

7.3 Key messages from the Options Consultation process in regards to additional transit pitches for Gypsies and Travellers were as follows:

- Opinions 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. Shropshire and Birmingham authorities adduced evidence that figures for transit pitch requirements had been interpreted too high because of misunderstandings in the GTAA findings. **Amendments to redress these gave an adjusted total transit pitch requirement of 224 pitches.**
- A single geographical distribution of transit provision was consulted on, based on the findings of the sub-regional Gypsy and Traveller Accommodation Assessments. 35% of consultees thought that this distribution would meet the accommodation needs of Gypsies and Travellers; 52% thought that it would not and 14% were not sure. Reasons for thinking the distribution would not meet needs included the need for a more even spread across the region, fear of over-provision in some areas and need for greater provision in metropolitan and urban areas.
- **In view of the range and balance of opinion, the Regional Interim Policy Statement retains the geographical distribution as that which was consulted upon. This distribution was based upon the Gypsy and Traveller Accommodation Assessments undertaken by local authorities and represents the best and most robust evidence available.**

7.4 Key messages from the Options Consultation process in regards to additional plots for Travelling Showpeople were as follows:

- There was more 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.

- 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.
- 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.
- **WMRA consider that the consultation response justifies the regional figure of 118 additional plots for Travelling Showpeople, and that these should be distributed on a County basis according to Option 1 – need where it arises as evidenced by the Gypsy and Traveller Accommodation Assessments.**

8. FURTHER CONSULTATION

8.1 Further consultation was undertaken in November 2009 with local authorities, other stakeholders and the Gypsy and Traveller Reference Group on a draft of the Interim Regional Policy Statement. A note summarising representations and the WMRA response is available at: ***.

8.2 All representations were carefully considered and taken into account where possible. In particular, evidenced amendments to GTAAs' findings on current pitch provision figures and requirements have been incorporated. Efforts have been made to relieve pressure on some authorities and make equitable redistributions of pitch requirements in the most pressured Warwickshire sub-region.

9. INTERIM REGIONAL POLICY

Policy on Residential Pitches for Gypsies and Travellers 2007 – 2017

- 9.1 In view of the work undertaken by the West Midlands Regional Planning Body, as part of RSS Phase 3 process, the Options Consultation and further consultation on a Draft Interim Regional Policy Statement, the Interim Regional Policy recommends the delivery of the following level of new accommodation:

Policy 1 : Pitch Requirements for Gypsies and Travellers, 2007 – 2017

- **660** additional Residential pitches required between 2007-2012
- **278** additional Residential pitches required between 2012-2017
- **224** additional Transit pitches between 2007-2017

- 9.2 At a District level the proposed allocation of additional RESIDENTIAL pitches for Gypsies and Travellers is:

Policy 1A : Local authority allocation of additional Residential pitches for Gypsies and Travellers 2007 – 2017

Local Authority	Allocation 2007-2017
Staffordshire & Stoke:	
Cannock Chase	35 pitches
East Staffordshire	15 pitches
Lichfield	14 pitches
Newcastle-under-Lyme	20 pitches
South Staffordshire	42 pitches
Stafford	37 pitches
Staffordshire Moorlands	2 pitches
Stoke-on-Trent	40 pitches
Tamworth	10 pitches
Warwickshire:	
North Warwickshire	16 pitches
Nuneaton & Bedworth	29 pitches
Rugby	42 pitches
Stratford-on-Avon	42 pitches
Warwick	23 pitches
Worcestershire:	
Bromsgrove	14 pitches

Malvern Hills	33 pitches
Redditch	14 pitches
Worcester	22 pitches
Wychavon	42 pitches
Wyre Forest	42 pitches
Birmingham, Black Country, Coventry & Solihull	
Birmingham	19 pitches
Coventry	15 pitches
Dudley	23 pitches
Sandwell	5 pitches
Solihull	28 pitches
Walsall	39 pitches
Wolverhampton	36 pitches
Herefordshire, Shropshire, Telford & Wrekin	
Herefordshire	109 pitches
Shropshire	93 pitches
Telford & Wrekin	37 pitches
REGIONAL TOTAL	938 pitches

9.3 **Appendix 3 sets out for each local authority its pitch requirement on the basis of need where it arises (Consultation Option 1) and its proposed requirement for provision in this Regional Policy Statement. The final column explains derivation of the proposed figure.**

Justification

9.4 The principles underlying the proposed allocations are:

- The regional total of 938 additional pitches 2007-2017, based on the GTAAs amended in the light of subsequent evidence from local authorities, is to be achieved.
- The 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 public 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. Appendix 4 provides further information on the derivation of the 14 pitch minimum and 42 pitch maximum premises.
- In order to maintain the regional total of 938 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).

9.5 Given West Midlands geography and the current pattern of provision for Gypsies and Travellers, these principles play out differently in different sub-regions, and the distribution of pitches in the Policy Statement reflects necessary pragmatic decisions to balance often conflicting factors. Local authorities with a need where it arises requirement of over 42 pitches form four sub-regions:

- 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 or high capacity evidenced by the extent of unconstrained land. 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.

Indicative Policy on Residential Pitches for Gypsies and Travellers beyond 2017

Policy 2 : Pitch Requirements beyond 2017

A co-ordinated review of sub-regional GTAAs should be undertaken no later than 2015 or sooner if refreshed evidence is agreed by the Responsible Regional Authorities to be required from the local authorities to inform the Strategy for the West Midlands (Regional Strategy). In the meantime Local Planning Authorities are expected to use the indicative figures in Table 1 below to provide a basis for planning for pitch provision beyond 2017 if fresh GTAA evidence has yet to be established.

- 9.6 In the absence of new GTAA evidence and subject to further higher level strategic policy which may subsequently be approved or come into force, local planning authorities are expected to use the indicative

figures in Table 2 post 2017, so that provision will be made across the region. This is based upon an anticipated household growth which is an annual 3% compound increase in the level of residential pitch provision for Gypsies and Travellers, assuming the back log of provision has been made by 2017.

9.7 Indicative additional pitch allocations 2017-2022 and 2022-2027 at District Level, assuming that each District will take a similar proportion of the regional total as in 2007-2017, are:

Table 2 : Indicative requirements for Residential Pitches for Gypsies and Travellers beyond 2017		
	Indicative requirements	
Local Authority	2017-2022	2022-2027
Staffordshire & Stoke:	77 pitches	89 pitches
<i>Cannock Chase</i>	<i>13 pitches</i>	<i>15 pitches</i>
<i>East Staffordshire</i>	<i>5 pitches</i>	<i>6 pitches</i>
<i>Lichfield</i>	<i>5 pitches</i>	<i>6 pitches</i>
<i>Newcastle-under-Lyme</i>	<i>7 pitches</i>	<i>8 pitches</i>
<i>South Staffordshire</i>	<i>15 pitches</i>	<i>17 pitches</i>
<i>Stafford</i>	<i>13 pitches</i>	<i>15 pitches</i>
<i>Staffordshire Moorlands</i>	<i>1 pitches</i>	<i>1 pitches</i>
<i>Stoke-on-Trent</i>	<i>14 pitches</i>	<i>17 pitches</i>
<i>Tamworth</i>	<i>4 pitches</i>	<i>4 pitches</i>
Warwickshire:	54 pitches	63 pitches
<i>North Warwickshire</i>	<i>6 pitches</i>	<i>7 pitches</i>
<i>Nuneaton & Bedworth</i>	<i>10 pitches</i>	<i>12 pitches</i>
<i>Rugby</i>	<i>15 pitches</i>	<i>17 pitches</i>
<i>Stratford-on-Avon</i>	<i>15 pitches</i>	<i>17 pitches</i>
<i>Warwick</i>	<i>8 pitches</i>	<i>10 pitches</i>
Worcestershire:	60 pitches	69 pitches
<i>Bromsgrove</i>	<i>5 pitches</i>	<i>6 pitches</i>
<i>Malvern Hills</i>	<i>12 pitches</i>	<i>14 pitches</i>
<i>Redditch</i>	<i>5 pitches</i>	<i>6 pitches</i>
<i>Worcester</i>	<i>8 pitches</i>	<i>9 pitches</i>
<i>Wychavon</i>	<i>15 pitches</i>	<i>17 pitches</i>
<i>Wyre Forest</i>	<i>15 pitches</i>	<i>17 pitches</i>
Birmingham, Black Country, Coventry & Solihull	59 pitches	68 pitches
<i>Birmingham</i>	<i>7 pitches</i>	<i>8 pitches</i>
<i>Coventry</i>	<i>5 pitches</i>	<i>6 pitches</i>
<i>Dudley</i>	<i>8 pitches</i>	<i>9 pitches</i>
<i>Sandwell</i>	<i>2 pitches</i>	<i>2 pitches</i>

<i>Solihull</i>	<i>10 pitches</i>	<i>12 pitches</i>
<i>Walsall</i>	<i>14 pitches</i>	<i>16 pitches</i>
<i>Wolverhampton</i>	<i>13 pitches</i>	<i>15 pitches</i>
Herefordshire, Shropshire, Telford & Wrekin	85 pitches	99 pitches
<i>Herefordshire</i>	<i>39 pitches</i>	<i>45 pitches</i>
<i>Shropshire</i>	<i>33 pitches</i>	<i>39 pitches</i>
<i>Telford & Wrekin</i>	<i>13 pitches</i>	<i>15 pitches</i>
REGIONAL TOTAL	335 pitches	388 pitches

Policy on Transit Pitch Provision for Gypsies and Travellers

9.8 For the purposes of this Regional Interim Policy Statement, **transit pitches are identified as any type of accommodation which meets the needs of Gypsies and Travellers on a temporary basis, for example a formal transit site, an informal stopping-place or designated location to address seasonal demands or instances of emergency.** A wide range of transit provision is required in the West Midlands, to facilitate movement both around and through the Region reflecting the culture and lifestyle of Gypsies and Travellers.

9.9 The proposed District allocation for additional transit pitches for Gypsies and Travellers is:

Policy 3 : Local authority allocation of additional Transit pitches for Gypsies and Travellers 2007 – 2017	
Local Authority	Allocation 2007 - 2017
Staffordshire & Stoke:	44 pitches
Cannock Chase	5 pitches
East Staffordshire	5 pitches
Lichfield	5 pitches
Newcastle-under-Lyme	5 pitches
South Staffordshire	5 pitches
Stafford	2 pitches
Staffordshire Moorlands	2 pitches
Stoke-on-Trent	10 pitches
Tamworth	5 pitches
Warwickshire:	40 pitches
North Warwickshire	5 pitches
Nuneaton & Bedworth	5 pitches
Rugby	5 pitches
Stratford-on-Avon	10 pitches

Warwick	15 pitches
Worcestershire:	68 pitches
Bromsgrove	0 pitches
Malvern Hills	10 pitches
Redditch	18 pitches
Worcester	20 pitches
Wychavon	20 pitches
Wyre Forest	0 pitches
Birmingham, Coventry & Solihull	20 pitches
Birmingham	10 pitches
Coventry	5 pitches
Solihull	5 pitches
Black Country	12 pitches
Dudley	3 pitches
Sandwell	3 pitches
Walsall	3 pitches
Wolverhampton	3 pitches
Herefordshire, Shropshire, Telford & Wrekin	40 pitches
Herefordshire	10 pitches
Shropshire	20 pitches
Telford & Wrekin	10 pitches
REGIONAL TOTAL:	224 pitches

Justification

9.10 Following the public consultation, the proposed provision in this Regional Interim Policy Statement for additional transit pitches for Gypsies and Travellers, 2007-2017, is directly based on the findings of the sub-regional GTAAs, amended for evidence provided by local authorities through consultation. These determine both the regional pitch total, the allocation between County groups and the indicative allocations to Districts.

Further Advice and Guidance

9.11 To facilitate movement around and through the West Midlands, all authorities are **encouraged to contribute to the creation of a 'Transitory Network'**. Since unauthorised encampments can occur anywhere and the resulting tensions can best be resolved through a collaborative response, this includes those authorities where the GTAA has identified nil need.

9.12 Each District will be expected to identify locations to deliver the number of additional Transit pitches identified. However, whilst indicative pitch

numbers are allocated on a District basis, it is hoped that joint working between local authorities will enable the identification of suitable sites over a wider geographical area and thereby contribute to speedier delivery.

Policy on Identification of Residential and Transit Sites for Gypsies and Travellers and the LDF Process

Policy 4 : Identification of Sites / LDF Process:

- a) **Local Development Frameworks** – each Local Planning Authority should identify the location of specific sites within their Development Plan Documents, to ensure the requirements set out in the Regional Interim Policy Statement (see ODPM Circular 01/2006) are met. These locations must be attractive to Gypsies and Travellers and take into account factors such as: impacts on significant environmental assets, access to the highways network and key services, any local evidence in relation to unauthorised encampments and historical patterns of travel and annual events. Where joint LDFs are prepared, the distribution of pitch numbers between authorities can be adjusted, where appropriate.
- b) **Criteria-based Policies** – criteria-based policies can accompany site allocations in DPDs but these should be supplementary only, with primary significance given to meeting the pitch numbers in the above Policies. A criteria based supplementary policy must be fair, reasonable, realistic and should not place undue constraints on the development of Gypsy and Traveller sites.
- c) **Identification of a Range of Sites** – each LPA is encouraged to identify a range of sites within their DPDs, which will meet the variety of accommodation needs, required by Gypsies and Travellers. Specifically:
 - I. the allocation of small sites is particularly recommended to facilitate the delivery of private family sites, together with larger allocations to deliver publicly owned and run sites.
 - II. the allocation of land to meet the specific accommodation needs of New Travellers should also be made within DPDs where locationally required.
 - III. both stopping places and more formal transit sites, which offer a range of basic services will be required. Where formal transit sites are required (as identified in the GTAAs) LPAs are encouraged to prioritise the delivery of these in order to directly address travelling patterns or repeated incidence of roadside encampments.

IV. Consultation with Travelling communities -LPAs are expected to consult with the Travelling communities within their respective areas, as part of their LDF process, to determine the most appropriate type of sites which will best meet their needs.

V. Rate of Delivery – LPAs should endeavour to actively promote policies and practices which encourage applications for new accommodation and prioritise addressing the existing backlog of need. LPAs may choose to take individual action or work in partnership with local Registered Providers (RPs) or Private providers but it is important that positive progress is made at regular stages and will be subject to a regular monitoring regime.

Policy on Plots for Travelling Showpeople

9.13 At a County level the proposed allocation of additional Plots for Travelling Showpeople is:

Policy 5 : Allocation of additional plots by County and local authority grouping for Travelling Showpeople 2007 - 2012	
County	Allocation 2007 – 12
Shropshire, Herefordshire and Telford & Wrekin	9 Plots
Staffordshire and Stoke-on-Trent	23 Plots
Warwickshire	1 Plot
Worcestershire	22 Plots
Birmingham, Black Country, Coventry & Solihull*	63 Plots
REGIONAL TOTAL:	118 Plots
* As at Jan 2010, 30 of these plots are required for the relocation and expansion of an existing funfair operator in Birmingham. As the operator’s area of search extends south beyond the conurbation, provision could be made elsewhere e.g. within Warwickshire, if a suitable site were to be required and identified. Please note Policy 6 b below.	

Justification

9.14 The Regional Policy Statement considers additional plot requirements at County level rather than at District level because of the problems of allocating relatively small plot numbers between districts for a group who often have a wide area of search and must satisfy commercial as well as residential criteria when developing sites.

- The time period is 2007-2012 because of difficulties in predicting requirements over a longer period in a changing occupational market.

- Following the public consultation, the WMRA proposed provision in the Regional Policy Statement for additional plots for Travelling Showpeople, 2007-2012, is directly based on the findings of the sub-regional GTAAs. These determine both the regional pitch total and the allocation between Counties and groups of authorities.
- In its response to the RSS Phase 3 period of public consultation, the West Midlands Branch of the Showmen's Guild supported Option 1, to distribute additional plots upon the basis of 'Need Where It Arises' and has subsequently expressed its agreement with the draft Policy Statement.

Identification of Sites in Relation to Commercial Requirements

9.15 The accommodation needs of Travelling Showpeople are influenced by economic considerations as well as more traditional concerns of housing needs. Consequently, when allocating land for new plots/yards, both accommodation needs and commercial requirements should be taken into account. In circumstances where a part yard or whole yard (a collection of plots) relocation is required, LPAs should acknowledge that this may result in significant geographical movement across the Region.

Policy 6 : Supporting Travelling Showpeople Policy:

- a) **Identification of Sites** – LPAs should allocate sufficient sites within their Local Development Frameworks, to address the level of need identified within the Interim Regional Statement after discussion with this business sector's representatives and neighbouring authorities to ensure relevant, sensitive and appropriate allocations of plots.
- b) **Relocation** -By working collaboratively, LPAs should address any individual cases for re-location as they arise, which will not only meet the needs of the Travelling Showpeople communities concerned but also bring economic benefits for the individual local authorities effected and the wider Regional economy overall. Relocation requirements should be justified, and clear mechanisms and criteria, including planning constraints, for identifying any necessary alternative site(s) need to be set out.
- c) **Relocation** -Where such a relocation is required between local authority areas, the resultant change over rides the plot numbers given in Policy 5. Annual Monitoring will track any such adjustments.

- d)** To ensure all allocations are appropriate, in terms of size (to meet both residential and commercial needs), design and location (to facilitate ease of movement by large vehicles from the yard to the Highways network), it is recommended that the guidelines produced by Showmen’s Guild of Great Britain are referred to in assessing site capacity and scheme design.

Active Dialogue with the West Midlands Branch of the Showmen’s Guild – to enable the delivery of new Travelling Showpeople plots / yards it is essential that LPAs develop an effective channel of communication with the Travelling Showpeople communities within their areas and those of neighbouring areas. The Showmen’s Guild holds specific knowledge as to the accommodation requirements of Showpeople, which should be beneficial in enabling delivery and meeting need.

Plot Requirement for Travelling Showpeople beyond 2012

9.16 An annual growth rate of 1.5% compound should be assumed beyond 2012 based on plot requirements at the start of the period. At regional level this produces an indicative estimate of between 25 and 30 additional residential plots each five year period beyond 2012.

Further Supplementary Considerations and Policy to Facilitate Delivery of the Interim Regional Policy Statement

Policy 7 : Supplementary Policy for Gypsy, Travellers and Travelling Showpeople Accommodation

Consultation and Active Dialogue with Travelling communities – to enable the identification of suitable sites, LPAs or groups of authorities are encouraged to open an active dialogue with the Travelling communities within their areas, to obtain a better understanding of their patterns of residence, travel and lifestyle. Local authority support for the establishment of local / sub-regional forums or networks would be helpful in terms of improving the capacity of individual Gypsy and Travellers and organisations to contribute to the debate around new accommodation and foster a more inclusive approach to Gypsy, Traveller and Travelling Showpeople issues overall.

Design and Size of Sites

9.17 It is essential that Development Control understands the specific needs and issues involved in new site/yard delivery. When considering site design, Development Control policy and processes should refer to the guidance produced by both Communities Local Government (CLG) and the Homes and Communities Agency (HCA), along with any examples of Best Practice from within the West Midlands and from other Regions, and, importantly, any advice obtained through consultation with local

Travelling communities. LPAs should acknowledge the diversity and complexity of the range of communities that are encapsulated within overall Gypsy and Traveller communities, which necessitates a variety of site layouts. For example, some sites for New Travellers may be quite informal in design and may not feature all standard facilities, whereas some sites for other Gypsies and Travellers may require additional land in order to accommodate animals and/or commercial activities.

- 9.18 A figure of 14 pitches – not all necessarily in the same place – has been identified in the Interim Policy Statement as an approximation to an ideal minimum provision at the District level to facilitate the creation of sustainable communities and guard against potential isolation. However, it is recognised that individual sites may be much smaller or larger, as determined by local requirements, and that an allocation of 14 pitches does not have to be met in one location.

Enabling of both Private and Public Sites:

- 9.19 LPAs are encouraged to actively enable the delivery of both public and private provision for Gypsies and Travellers. Whilst it is anticipated that half or more of the additional pitch requirements will be met by Gypsies and Travellers themselves, it is essential that public provision is facilitated to meet the needs of the more vulnerable sections of the Travelling communities, including the elderly, young people and those with health issues.

- 9.20 It is likely that most new provision for Travelling Showpeople will be privately funded, but in view of the prevailing economic circumstances this assumption should be kept under regular review. Any emerging evidence of an increasing inability to make self-provision should be investigated to see whether public support can be made available.

Maintenance of Sites

- 9.21 As additional accommodation will only be delivered as result of the input of a considerable range of resources, it is essential that good quality accommodation is retained. Effective management and maintenance arrangements should be put in place as a condition of new and refurbished pitch provision to ensure that sites do not fall into disrepair, leading to abandonment and loss of provision.

Role of the Homes and Communities Agency

- 9.22 The Homes and Communities Agency (HCA) administers the Gypsy and Traveller Site Grant Programme which provides public funding for the

delivery of new and refurbished accommodation by local authorities, RSLs and Registered Providers. The HCA will use the 'Single Conversation' process to discuss the delivery of new accommodation for Gypsies, Travellers and Travelling Showpeople with each local authority and thereby ensure that this element of housing need is not left unaddressed.

- 9.23 Consequently, local authorities are encouraged to consider developing bids to the Grant programme and to seek advice from the HCA, the Assembly (or its successor body) and GOWM, where appropriate. Examples of innovation in delivery are particularly encouraged, with creative partnership arrangements between local authorities, RSLs and Registered Providers, and Gypsy and Traveller communities. Proposals for shared-ownership or self-build schemes may be suggested.
- 9.24 Local authorities are also asked to encourage the provision of sites through private funds, such as private developer contributions and Gypsy and Traveller pitch provision within new large-scale residential developments.

The Greenbelt

- 9.25 ODPM Circular 01/2006 acknowledges the difficulties that many rural authorities face in terms of the supply of affordable land to meet the accommodation needs of Gypsies and Travellers. Consequently, while development within the Green Belt is normally inappropriate, authorities in this situation should consider including a 'Rural Exception Policy' in their DPDs and bear in mind the possibility of adjustments to Greenbelt boundaries which can be made in exceptional circumstances for the provision of Gypsy and Traveller sites.

Joint Working / Cross-Boundary Working

- 9.26 It is recognised that the delivery of additional pitches and plots will be challenging for many local authorities and it is therefore suggested that a collaborative approach may benefit some of the issues involved. The delivery of new accommodation for Gypsies, Travellers and Travelling Showpeople must be seen within the wider agendas of community cohesion and social inclusion. Local authorities are encouraged to consider undertaking community development work to secure improved community understanding of the issues involved and to develop local leadership in order to drive forward a sustainable pattern of delivery.

Monitoring

9.27 Progress on the delivery of new accommodation by each LPA will be monitored through the Annual Monitoring Report (AMR). The HCA will be partners with the Regional bodies monitoring this and will include the results in its Single Conversation work with local authorities.

Summary of National Policy Background

The Government is committed to increasing the levels of authorised site provision for Gypsies and Travellers and Travelling Showpeople. The Government established a new policy framework to significantly reduce the current levels of unauthorised camping and avoid the problems that some unauthorised sites can cause, for example increased tension between Gypsies and Travellers and the wider community and costs to the local taxpayers.

In attempting to tackle these inequalities and specifically to resolve the problems which unauthorised development and camping can create, the Government expects local authorities to take a balanced approach by carrying out effective but fair enforcement of planning policies and by working to develop new sites and improve existing ones. The Government believes that well managed, authorised sites can provide a solution for all concerned, and in support of this the Department for Communities and Local Government (CLG) provides capital funding through the Gypsy & Traveller Site Grant Programme. The Grant Programme is expected to make £97million available nationally to local authorities and Registered Social Landlords over the 2008-2011 period, with innovative approaches to site delivery being encouraged.

Moreover, Gypsies and Travellers and Travelling Showpeople have an important part to play in terms of the delivery of new sites, with many likely to be established through private funds. In relation to this and to enable Gypsies and Travellers and Travelling Showpeople to make self-provision, Government requires Local Planning Authorities to allocate sufficient land in their Local Development Frameworks (LDFs) to meet pitch / plot requirements for both social and private sites and respond positively to Travellers seeking guidance in regards to the overall planning application process.

ODPM Circular 01/2006

The Government's position on addressing the issues brought about by unauthorised camping and development has been developing for some years, with new Policy statements being issued in 2006 and 2007. ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites was issued on 2 February 2006 and put in place a legislative framework for planning Gypsy and Traveller sites, with local authorities having to address the unmet need of Gypsies and Traveller within their area (need for accommodation to be identified through an assessment of accommodation needs, as required under the Housing Act 2004).

The Circular defines Gypsies and Travellers and recognises that some may well have a lifestyle of active travel and be self-employed in occupations such

as seasonal agricultural work but that some Travellers may have a more settled lifestyle, as they work in trades which require lesser mobility or no longer travel due to issues of health and/or age.

CLG Circular 04/2007

CLG Circular 04/2007: Planning for Travelling Showpeople was issued on 21 August 2007 and acknowledged that previous Guidance (Circular 22/91) had failed to deliver adequate sites for Travelling Showpeople. The Circular indicated that the needs of Travelling Showpeople should be treated in a similar way to those of Gypsies and Travellers and that Gypsy and Traveller Accommodation Assessments are to include the needs of Travelling Showpeople, which will then be incorporated into revised Regional Spatial Strategies (RSSs) and Local Development Plans (LDPs).

The Circular defines Travelling Showpeople in relation to their distinctive occupations –fairs, rides and amusements with associated catering and other stalls – which result in a pattern of frequent travel for short periods of time.

The Greenbelt and Sites in Rural Areas

ODPM Circular 01/2006 also acknowledges the difficulties that many rural authorities face in terms of the supply of affordable land to meet Gypsies' and Travellers' accommodation needs. Consequently, it states that authorities in this position should consider including a Rural Exception Sites Policy in their Development Plan Documents and that while development within the Greenbelt is normally inappropriate, adjustments to Greenbelt boundaries can be made, in exceptional circumstances, for the provision of Gypsy and Traveller sites.

Connecting Traveller Accommodation Need to General Housing Need

Gypsy and Traveller and Travelling Showpeople policy does not and should not operate in isolation, and the Government has signalled its intention for Gypsy and Traveller and Travelling Showpeople accommodation to be planned for and delivered in the same way that all other housing is provided. In relation to this intention, several recently introduced changes should have a positive impact upon the delivery of new sites in the future.

Housing Green Paper: More Affordable, More Sustainable

The Housing Green Paper was published in July 2007, which set down new expectations in relation to an enhanced role for local authorities in creating a 'strategic vision' for housing policy and delivery across their communities. This 'strategic vision' should encompass the needs of all sections of the community, which includes the needs of Travellers and is intended to encourage the incorporation of accommodation needs of Gypsies and

Travellers and Travelling Showpeople as part of general housing provision in the future.

The Housing and Regeneration Act 2008

The Housing and Regeneration Bill received Royal Assent in July 2008 and will help to deliver the commitments set out in the Housing Green Paper, namely to provide more and greener homes, in mixed and sustainable communities. One of the key features of the Bill was the decision to merge the Housing Corporation (which delivered Social housing) and English Partnerships (which delivered large scale regeneration projects). A new single National Agency known as the Homes and Communities Agency (HCA) became formally operational on 1 December 2008. One of the HCA's responsibilities is the delivery of the national Gypsy & Traveller Site Grant Programme, acting on the advice of the Regional Housing Executive in terms of funding bids from local authorities and RSLs. The HCA will assist through its expertise in delivering challenging projects.

Key stages in the Gypsies, Travellers and Travelling Showpeople element of the RSS Revision Phase 3 Process

1. Assembling an Evidence Base:

- Completion by the local authorities of their six sub-regional Gypsy and Traveller Accommodation Assessment (GTAAAs) in 2007/2008
- Establishment of an RSS Gypsy and Traveller Reference Group (local authority officers and representatives from other stakeholder organisations) in summer 2008, to advise on the process of engagement and the development of policy
- Production of a Regional Overview of the sub-regional GTAAAs
- Submission of advice from Strategic 4 (4) Planning Authorities
- Supplementary technical work to benchmark the GTAA findings and ensure cross-regional comparability between them

2. Development of 'Options' for new Regional Planning Policy:

- Consideration of other Regions' approaches to the development of Options where they were further advanced in their respective RSS Revision processes
- Consideration of outcomes from RSS Examinations in Public in other Regions, e.g. South West, East of England
- Contributions made by members of the RSS Gypsy & Traveller Reference Group and by individual Gypsies, Travellers and their representatives.
- Development and appraisal of 'Scenarios' to identify merits and limitations of potential re-distributive Options
- Commissioning of a 'Constraints and Opportunities' mapping exercise to indicate, in general terms, the broad availability of land within each District to accommodate new provision

3. Consultation on 'Options' for new Regional Planning Policy:

- Launch of West Midlands Regional Spatial Strategy Phase Three Revision Options Consultation document on 29 June 2009 – presented
 - Three Options for new Policy on the provision of permanent pitches for Gypsies and Travellers,
 - an Option on the provision of transit pitches and
 - two Options on the provision of plots for Travelling Showpeople
- Period of public consultation ran between 29 June – 14 August 2009
- Consultation events facilitated with Gypsies and Travellers in the West Midlands Region – events were held in Hereford, Nuneaton & Bedworth, Stoke-on-Trent, Telford and Worcester

- Distribution of a questionnaire to the Travelling Showpeople community, via the West Midlands Branch of the Showmen's Guild
4. Assessment of Responses Submitted to the Public Consultation Period:
- Collation and assessment of responses undertaken by WMRA consultants, URSUS Consulting, between August – October 2009
 - Assessment of responses to Gypsies, Travellers and Travelling Showpeople element of Phase 3 completed by the Centre for Urban and Regional Studies, University of Birmingham, in October 2009
5. Development of a Regional Policy Statement:
- Formulation of a Statement undertaken by WMRA between October 2009 – March 2010
 - Formal comment sought from local authorities on the draft Statement – November 2009
 - Input by RSS Gypsy & Traveller Reference Group – November 2009
 - Consideration of representations received and amendment to the draft
 - Input from the RSS 3 Reference Group 5 Jan 2010 and the RSS Policy Leads and Coordination Groups both on 6 Jan 2010.
6. Endorsement and Adoption of Regional Policy Statement:
- Consideration by West Midlands Regional Assembly Board at its meeting on 15 January 2010
 - Consideration by the Regional Planning and Environment Executive (RPEE) at its meeting on 23 February 2010
 - Approval by the full Regional Assembly at its meeting on 17 March 2010
 - Ratification by the Joint Strategy and Investment Board (JS&IB) at its meeting on 23 March 2010 (as well ratification by the West Midlands Leaders Board (WMLB))
 - Submission to GOWM on 31 March 2010

Derivation of Preferred Option Allocation of Additional Residential Pitch Requirements			
Local authority	Consultation Option 1	Provision in Regional Policy Statement	Derivation
Cannock Chase	35	35	Need where it arises from GTAA
East Staffordshire	15	15	Need where it arises from GTAA
Lichfield	11	14	Increased allocation for pitches (3) diverted from South Staffordshire
Newcastle under Lyme	20	20	Need where it arises from GTAA
South Staffordshire	50	42	Reduced to 42 pitch allocation; pitches diverted to Lichfield (3), Sandwell (2) and Telford & Wrekin (3)
Stafford	37	37	Need where it arises from GTAA
Staffordshire Moorlands	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
Stoke on Trent	40	40	Need where it arises from GTAA
Tamworth	7	10	Increased allocation for pitches (3) diverted from Rugby
North Warwickshire	10	16	Increased allocation for pitches (6) diverted from Rugby
Nuneaton & Bedworth	29	29	Need where it arises from GTAA
Rugby	66	42	Reduced to 42 pitch allocation; pitches diverted to Tamworth (3), North Warwickshire (6), Warwick (3) and Coventry (12)
Stratford on Avon	52	42	Reduced to 42 pitch allocation; pitches diverted to Warwick (7), Redditch (1) and Solihull (2)
Warwick	13	23	Increased allocation for pitches diverted from Rugby (3) and Stratford on Avon (7)

Local authority	Consultation Option 1	Provision in Regional Policy Statement	Derivation
Bromsgrove	3	14	Increased allocation for pitches (11) diverted from Wychavon
Malvern Hills	33	33	Need where it arises from GTAA
Redditch	0	14	Increased allocation for pitches diverted from Stratford on Avon (1) and Wychavon (13)
Worcester	22	22	Need where it arises from GTAA
Wychavon	66	42	Reduced to 42 pitch allocation; pitches diverted to Bromsgrove (11) and Redditch (13)
Wyre Forest	44	42	Reduced to 42 pitch allocation; pitches diverted to Dudley (2)
Birmingham	19	19	Need where it arises from GTAA
Coventry	3	15	Increased allocation for pitches (12) diverted from Rugby
Dudley	21	23	Increased allocation for pitches (2) diverted from Wyre Forest
Sandwell	3	5	Increased allocation for pitches (2) diverted from South Staffordshire
Solihull	26	28	Increased allocation for pitches (2) diverted from Stratford on Avon
Walsall	39	39	Need where it arises from GTAA
Wolverhampton	36	36	Need where it arises from GTAA
Herefordshire	109	109	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land
Shropshire	93	93	Need where it arises from GTAA; allocation remains unchanged because of the extent of unconstrained land
Telford & Wrekin	34	37	Increased allocation for pitches diverted from South Staffordshire

Appendix 4

Justification for 14 Pitches Minimum Allocation

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 GTAAs (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.