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Helen Hockenhull  
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Your Ref:  
Our Ref: PINS/F2360/429/2  
Date: 4 March 2014

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Dear Ms Hockenhull

## **South Ribble Site Allocations and Development Management Policies DPD Central Lancashire GTAA January 2013**

Thank you for your letter dated 24<sup>th</sup> February 2014 setting out the draft wording of a proposed modification to the Plan.

Your letter does not respond to the first matter set out in my 6<sup>th</sup> February letter relating to the Duty to Co-operate. You have subsequently sent me the draft Duty to Co-operate Supplement prepared by Chorley Council, but this does not demonstrate how South Ribble are able to demonstrate compliance with the Duty.

I note the Council's responses to the matters and issues relating to the GTAA, but many of my concerns remain unresolved. I have set out my further comments on these matters in the annex to this letter. Some of my responses are set out as questions but it is unnecessary to enter into further discussion on these detailed points at this stage. These would be matters for consideration during the examination on the Gypsy and Traveller DPD. However, for the purposes of the current Plan, the situation remains that I am not satisfied that the GTAA provides a robust assessment of need.

Therefore, in order to make the Plan sound I first need to be satisfied that the legal and soundness requirements of the Duty to Co-operate have been met. In addition, I consider that the suggested modifications must include the Council's undertaking to carry out further work to the GTAA. It will be necessary to include the commitment to undertake a joint DPD for gypsy and traveller site provision, including transit sites and plots for travelling showpeople. The LDS must also be updated at this stage to include the timescale for this work, as set out in your Table 2 (Appendix 1 of your letter). The updated LDS will be required in order to ensure soundness of the Plan. Monitoring should also take place to ensure that this timescale is met and this should be included within the Performance Monitoring Framework of the Plan.

I have made some suggested changes to the wording of the proposed modification as follows:

*'Working with Preston and Chorley Councils a Central Lancashire Gypsy and Traveller and*

Travelling *Showpeople* Assessment (GTAA) was commissioned in July 2013. The overall purpose of the study was to assess overall accommodation need and distribution for each participating local authority, undertaken in a manner which conforms to national policy. The study was finalised in December 2013 and the final report was sent to the Inspector for her consideration. The Council then received *letters* (dated 6 February 2014 and 5 March 2014) from the Inspector highlighting various issues and matters in relation to the GTAA.

In light of this the Council now commits to undertake further work on the Gypsy and Traveller Accommodation Assessment (GTAA) within 12 months (from February 2014), with a view to resolving the outstanding concerns as highlighted in the annex to the Inspector's *letters*. The Council also makes the commitment to produce, *jointly with the neighbouring authorities of Chorley and Preston*, a separate Gypsy and Traveller and Travelling *Showpeople* accommodation Development Plan Document (DPD), *to include transit site provision*, in line with the outcomes of the further GTAA work. The timescales for this work *are* documented within the *updated* Local Development Scheme (LDS).

In carrying out this work, *and in the assessment of any future planning applications which may come forward*, the Council recognises the need to ensure fair and equal treatment for the gypsy and traveller *and travelling showpeople* community and the need to facilitate the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

The Council recognises that the gypsy and traveller and travelling showpeople population can be hard to reach when undertaking GTAAs and that there may be a need *resulting from* overcrowding *on existing sites*, concealed households or those living in bricks and mortar which the current GTAA has been unable to identify.

Any future planning applications submitted to the Council relating to gypsy and traveller and travelling show people sites will be assessed on the basis of the Central Lancashire Core Strategy Policy 8 and the national '*Planning policy for traveller sites*', or any subsequent national policy.'

I note the timescale for adoption of the current Plan set out in your letter. Depending on the level of responses to the consultation on the above modification, it should be possible to shorten the timescale between submission of those responses to me and receipt of the final report. I would suggest that a two week timescale would be sufficient although this would be likely to increase, to the timescale set out in your letter, if significant responses are received.

In summary therefore I would expect the following in response to this letter:

- Relevant information to demonstrate that South Ribble has complied with the Duty to Co-operate on this matter. In this regard I would need to be satisfied that the Council has in place effective mechanisms for continued constructive engagement and co-operation on this cross-boundary matter. The evidence should give reasonable confidence that the relevant issues will be addressed as far as possible.
- Acceptance of the alterations to the proposed modification.
- Confirmation that the LDS will be updated at this stage and a timescale to ensure that this occurs.
- Confirmation of the wording to be included within the Performance Indicators to ensure that the timescale for production of a separate DPD is met.

On receipt of satisfactory information on these matters, I will be able to confirm that the Council should undertake consultation on the proposed modification. I look forward to hearing from you no later than 12 March 2014.

Yours sincerely

*Susan Heywood*

Senior Housing and Planning Inspector

## **Annex to Inspector's Letter dated 4 March 2014**

### **Inspector's further comments on Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) January 2013**

#### **Inspector's Matters and Issues to be Resolved (6.2.14)**

Reference is included to Preston and Chorley where this highlights concerns with the GTAA. These matters should be the subject of cross boundary discussions.

#### ***Cross-boundary issues:***

1. The GTAA is recommending the provision of sites on the basis of 'need where it arises'. This has the effect of reinforcing the uneven distribution of the existing population and ultimately constrains choices for gypsies and travellers in accessing suitable sites. How is cross boundary need to be addressed and met?

#### *Council response (24.2.14)*

*The Council has prepared a Draft Duty to Cooperate Supplement: Gypsy and Traveller and Travelling Showpeople – Feb 14 - which details how we have engaged and are continuing to work with neighbouring authorities. This demonstrates that procedures are in place to ensure ongoing, meaningful consultation and discussion. To date, our neighbouring authorities have stated that they intend to provide for their need within their own boundaries.*

*The GTAA focused on identifying needs arising within Chorley/Central Lancashire from existing households living on pitches; from households living in bricks and mortar accommodation; and newly-arising need from both people currently on pitches or living in bricks and mortar accommodation. Interviews with all the Chorley Traveller community captured their need over the plan period and included any aspirations members of their extended family may have to locate in Chorley. The research also considered whether there was any need from households moving within the sub-region (Chorley, Preston and South Ribble).*

*What the study cannot do is identify need arising from outside the study area as this can only be achieved through a much wider study. Central Lancashire authorities have set out how they intend to progress cross boundary issues with neighbouring LAs post assessment. As neighbouring LA assessments fall into place this will enable us all to come together and discuss what current evidence is saying about need and address where requirements may need to be met within Central Lancashire from outside the area. The mechanisms for this are already in place e.g. Lancashire Development Plans Officers' Group – Gypsy and Traveller Forum.*

*There is nothing in the guidance that requires authorities to 're-distribute' the gypsy community. The Council's approach is to accommodate their need (linked in with schools, jobs, social services etc) where it arises rather than seek to disperse the traveller community.*

*The Council agrees that need, where need arises, reinforces the uneven distribution of travellers. However given that, the evidence used to support the*

*redistribution approach set out in former RSS partial review was disputed by a number of LAs as being inaccurate and is now considered out of date (2008). If you do not adopt a need where need arises approach there are issues around where you draw the line in terms of the fieldwork. Technically you should be asking all travellers regionally, even nationally, whether they would want to live in Central Lancashire. This presents difficulties in terms of defining an equitable study boundary that does not use LA boundaries. There is also an issue around 'choice'. The consultants do ask where respondents would like to live given the choice but this is given no weight - it is always about need. Therefore it is sensible for all LAs to do new research on the basis of need where need arises and then work together under the duty to cooperate to identify if and where their respective evidence indicates that respondents want to live in other study areas - this then forms the basis for progressing any new policies/sites.*

*Arc4 are currently undertaking GTAA studies using the same methodology for Merseyside and AGMA, therefore this approach is considered appropriate and consistent across a large part of the north-west.*

*In summary, any cross boundary need will be identified in the respective studies neighbouring authorities are undertaking. At this point in time, this potential need is currently not quantified and indeed may not exist. Should a need be identified in the future, mechanisms are in place under the Duty to Cooperate to satisfy this need. To guide site selection, the Council considers that it is prudent to rely on Core Strategy Policy 8, as stated in the planning policy for traveller sites 'Para 10 .. Where there is no identified need, criteria based policies should be included to provide a basis for decisions in case applications nevertheless come forward.'*

#### **Inspector's further comment dated 4 March 2014**

**I do not suggest that the existing gypsy community should be dispersed, what is being highlighted is that future provision of additional sites becomes concentrated when sites are provided on a 'need where it arises' basis. As I have already said, this ultimately constrains choices for the gypsy community. Whilst I acknowledge that there is no requirement for re-distribution of future pitches as such, there are legal and soundness requirements to demonstrate co-operation on cross-boundary issues.**

**The Council's response on this matter, as set out above, appears to be inconsistent with the GTAA, which indicates that not all neighbouring authorities intend to provide for need within their own boundaries, and with responses from LA's e.g. Blackburn with Darwen Council which affirm this. It is also inconsistent with paragraphs 36 and 37 of Chorley's draft February 2014 Duty to Co-operate supplement, which also acknowledges that Blackburn with Darwen Council seeks a more even distribution of gypsy and traveller pitch provision across the NW Region. Also, as reported in Table A Section A1 of the draft February 2014 Duty to Co-operate supplement, Bolton Council has also made representations objecting to Chorley's Local Plan and supporting a more even distribution of gypsy and traveller pitch provision across the NW Region. Paragraph 37 of the draft February 2014 Duty to Co-operate supplement is dismissive of Blackburn with Darwen Council's objection, and as indicated in Table A Section A2 of the draft February 2014 Duty to Co-operate supplement, it is unknown if Bolton Council's objection to Chorley's Plan is still outstanding.**

**Therefore, it is not clear from the evidence submitted that the legal requirements of s33A(2) of the Act, which requires amongst other matters**

**constructive engagement, and of paragraph 181 of the Framework, which expects demonstrable evidence of effective co-operation on planning for issues with cross-boundary impacts have been met. In addition, it is unclear if paragraph 182 of the Framework, which requires effective joint working on cross-boundary strategic priorities, has been met.**

**South Ribble's response does not include information to demonstrate that the legal and soundness requirements of the duty to co-operate have been met. The information relating to Chorley Council will not suffice for this purpose. Evidence must be specific to South Ribble and regard should be had to the above comments, so far as they are relevant to South Ribble's Plan, in formulating the Council's response.**

***Does the GTAA represent a true picture of the gypsy and traveller population?***

2. The survey reached all of the existing gypsy and traveller households living on pitches in the area and in this respect was successful. However, it initially identified 39 households who identified themselves as gypsies and travellers in the 2011 Census. Only 26 households were interviewed (23 on sites and 3 in bricks & mortar). Therefore there are 13 households 'missing' from the survey. But the survey includes no weighting to account for any need arising from that part of the population which was not reached (para 6.9).
  
3. There are no existing gypsy and traveller sites in South Ribble, but there is evidence referred to in the GTAA that there are existing gypsy and traveller households living in bricks & mortar in South Ribble<sup>1</sup>. It would appear that no attempt has been made to identify and reach these households.

*Council response (24.2.14)*

*It is not accurate to say there was no attempt made to identify and reach households in bricks and mortar accommodation. Contacting households living in bricks and mortar accommodation is a key objective of fieldwork. At inception we ask LAs (and relevant partners) to provide any details of gypsies and travellers in bricks and mortar accommodation who may want to be engaged with the study. Additionally, the field team uses local knowledge to identify households living in bricks and mortar accommodation.*

*The households in bricks and mortar 'hidden' need was considered, however, as none of those interviewed planned to move onto a site within Central Lancashire, the figure on the summary of need Table 6.1 is recorded as zero.*

*The baseline information for the GTAA was derived from Council data/knowledge and augmented with local knowledge from Gypsies and travellers engaged with the research.*

*The 2011 Census shows that across Chorley there were 57 people who identified as having a Gypsy/traveller ethnicity. However, many people will identify with a Gypsy/traveller heritage but not be actively participating in travelling or seeking to live on a site. It cannot therefore be assumed that because someone is stating a Gypsy/traveller ethnicity that they would be active in travelling or seeking a pitch. Indeed, DCLG Caravan Count data consistently shows between 5 and 6 caravans living on unauthorised and not tolerated sites in Chorley. This would suggest a consistent pattern in the*

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<sup>1</sup> Para 9.9; stakeholder response at D.18



*number of G&Ts living in caravans in the District and a much lower measure compared to the census.*

#### **Inspector's further comment dated 4 March 2014**

**This information only relates to Chorley. No consideration has been given to my initial query relating to the gypsies known to be living in South Ribble.**

*Council response (cont)*

*As the GTAA is specifically considering future pitch requirements, it focuses on interviewing households currently living on pitches (authorised or otherwise) and those living in bricks and mortar accommodation who need to move to a pitch. Households in bricks and mortar accommodation are identified by engaging gypsy and traveller interviewers who use family friendship networks to identify potential survey respondents. Using Gypsy and traveller interviewers has contributed significantly to the receptiveness of community members, reduced rejection rates and increased response rates in the interviews.*

*The Census does not allow us to identify individual households. LCC Education department provided details of known gypsy families which allowed the Consultants to undertake additional interviews. Also, using travellers to interview this community facilitated a large response and allowed the consultants to identify and engage with households that may not have been identified/cooperative otherwise. Not all households could be identified and some were unwilling to partake in the study hence the 13 households. These certainly are not 'missing' as the information gleaned for a very representative survey was weighted and factored into the model.*

#### **Inspector's further comment dated 4 March 2014**

**The GTAA says at 6.9 that the data has not been weighted. If the survey was weighted and these 'missing' households factored into the model, what is the evidence to demonstrate this?**

*Council response (cont)*

*As the GTAA was based on robust evidence of the number of pitches and by engaging community interviewers to identify households living in bricks and mortar accommodation we believe the data is robust.*

#### ***No provision is made for Travelling Showpeople (TS)***

4. The GTAA says that no response was received from the TS contacts that the survey team were given (para 1.14). But, in reporting the responses of Stakeholders, it says (at para 9.15) "The Showman's Guild has requested provision of a separate yard for Showpeople". This information is conflicting and it does not justify the conclusion not to provide any sites, particularly as TS families have made written and oral representations on the Plan. This level of need appears to have been ignored in the GTAA.

*Council response (24.2.14)*

*The views expressed by the Guild were that - their views were based on their knowledge of the wider TSP community in the North West. However, no detailed evidence other than the disputed 2008 study was forthcoming to support their views (The consultants repeatedly requested details of fairs and shows in Central Lancashire to try and evidence activity of TSP in the study area but did not get any response other than a referral back to the 2008 study,*

*a study undertaken by the Travelling Showpeople for Travelling Showpeople that was not assessed for its robustness and is now significantly out of date).*

*The Showman's Guild was also invited to supply details of any of its members who wished to locate to Central Lancashire in order that they could be interviewed. However, it was unable to provide such details.*

*Furthermore, those Showpeople who made representations to the Chorley Local Plan and appeared at the Examination Hearing were contacted direct and repeatedly by telephone and email and failed to participate in the study.*

#### **Inspector's further comment dated 4 March 2014**

**Nevertheless, those individual showpeople have attempted to engage with the Local Plan process. There clearly is a level of need, even if just for those individuals. The evidence does not support the non-provision of sites.**

5. The GTAA refers to the need identified in the RSS Partial Review that each Council in Central Lancashire should provide 10 plots for TS. It goes on to say that that information is now significantly out of date and, as surrounding authorities are progressing their own GTAAs, their TS needs will be covered in their respective studies and "any cross boundary need will be satisfied through the arrangements set up under the duty to co-operate" (para 4.8). How is this cross boundary need to be addressed?

*Council response (cont)*

*The RSS Partial Review was never carried forward; indeed it was not endorsed by many of the Lancashire authorities. It is not appropriate to take this forward and it would be contrary to the study methodology to do so. The GTAA presents up-to-date information on need which is to be accommodated in the councils' respective plans. The Duty to Cooperate Paper adequately covers this strategic cross-boundary issue and it is prudent to rely on Core Strategy Policy 8 to assess any future need that may arise (refer to comments under Para 1).*

#### **Inspector's further comment dated 4 March 2014**

**See above comments on the Duty to Co-operate.**

##### ***Transit site provision***

6. The GTAA only takes account of the need for transit sites up to 2018. This does not cover the Plan period.

*Council response (24.2.14)*

*Transit need is based on analysis of current travelling activity/unauthorised encampments over the recent past - as there is no reason to assume that travel patterns will change (increase) significantly in the long term the provision of transit to meet this identified need should therefore be sufficient to meet the need in the long term too - it is a one off requirement. Indeed, it is anticipated that future transit need could well reduce as Central Lancashire and surrounding authorities complete their own GTAAs and provide for their respective permanent and transit needs.*

*Chorley Council will continue to monitor gypsy and traveller and travelling showpeople issues annually and review the policies/allocations as appropriate.*

*It will also undertake a five year review of the GTAA in accordance with best practice guidance.*

#### **Inspector's further comment dated 4 March 2014**

**Accepted. However, this response only relates to Chorley. What is South Ribble's response? Assuming it to be the same, the commitment to monitor and review, and then to address issues arising from the review, should be included in the Gypsy and Traveller DPD.**

#### ***Has the identified level of need taken account of all factors?***

7. Unauthorised encampments - There have been unauthorised encampments in both South Ribble and Chorley since 2010. In South Ribble during 2013, these occurred in Jan (3 incidents), Feb, May, June, July (2 incidents) and August (2 incidents). In Chorley during 2013, these occurred in Feb, March, June & July. In South Ribble, monitoring of the duration of these occurrences appears not to take place so that in many instances there is no record of how long the encampment was in place. The GTAA uses these figures to indicate that there is a transit need, but without the detail on the length of duration of the stop, and indeed who those travellers were, this could be masking a more permanent need (see DCLG guide<sup>2</sup> at para 6.2). See also point 15 below relating to the duration of the survey.

#### *Council response (24.2.14)*

*The study identified the unauthorised activity over a three year period. In Chorley these occurred in Feb 2010, April 2010, April 2011, July 2011 (2 incidents), August 2011, March 2012, May 2012, July 2012, February 2013, March 2013, June 2013, and July 2013. The duration of stay was multiplied by the number of caravans to arrive at a figure that was comparable with South Ribble and Preston. In South Ribble, the unauthorised duration of stay was not known in some instances, so a factor of three was applied (a figure above the average duration of stay for those recorded). Details of who the travellers were was obtained and provided to the consultations and this has informed the calculations, however, due to data protection issues this cannot be published in the report. This could be made explicit in the final study.*

#### **Inspector's further comment dated 4 March 2014**

**There is no explanation as to why this level of need has been taken to be indicative of transit need rather than permanent need. It is not necessary to identify individuals in the GTAA, but information is required to demonstrate whether or not the same families are resorting to the area regularly. In addition, if details of the travellers were obtained it should be possible to identify whether they are genuinely travelling through, and have a permanent base elsewhere, or not. The latter could be indicative of a permanent need.**

**There are also some detailed queries on this response:**

- **I do not understand the sentence "*The duration of stay was multiplied by the number of caravans to arrive at a figure that was comparable with South Ribble and Preston.*" Is this a reference to the average duration of stay?**

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<sup>2</sup> Gypsy and Traveller Accommodation Needs Assessments Guidance 2007



- **In South Ribble, in only 6 out of 18 occurrences was the duration of stay known. I would suggest that the Council's response rather down-plays this.**
  - **The response says that a factor of 3 was applied, whereas the GTAA says it was a factor of 2.**
8. Unauthorised developments - Information was taken from the Bi-annual Caravan Count<sup>3</sup> (table 5.1). This shows that at each count from July 2011 there were 5 or 6 caravans on unauthorised pitches in Chorley. The last count used was Jan 2013. These do not appear to have been taken into account in the table which summarises need and supply (table 6.1). I would have expected these to appear in the 'unauthorised' section of the 'current pitches'. I have assumed these to be different to the 2 authorised temporary pitches in Chorley (which are identified in the table). But further explanation may demonstrate that these are the same (i.e. it may be that these pitches were unauthorised and have subsequently been granted temporary planning permission and so are appearing in the authorised section of the table. This is not clear from the report).

*Council response (24.2.14)*

*Table 5.1 – this is the CLG caravan count figures showing the number of caravans on authorised sites with planning permission and number of caravans on unauthorised pitches without planning permission. The table would benefit from the slight change to headings to 'Caravans on authorised sites with planning permission' and 'Caravans on unauthorised pitches without planning permission'.*

*Table 6.1 covers need for permanent pitches and considers the current number of pitches in the District. Table 6.1 identifies two pitches on a private temporary authorised site as confirmed by the Council. It should be borne in mind that each pitch has the potential to accommodate more than one caravan (up to three on a permanent pitch). Detailed information such as the names of those households camping illegally has not been collected. However, it is reasonable to conclude that the number of caravans identified in the caravan count data largely relates to these pitches.*

*The transit need is calculated separately using a different model. It is calculated using unauthorised encampment data as an indicator of need. Data on the number of encampments, length of time and number of caravans reported has been used to identify the scale of transit need. This is reported in paras 7.7 to 7.19 of the GTAA report and identifies a transit need of three pitches across Chorley.*

**Inspector's further comment dated 4 March 2014**

**I understand that the number of caravans and pitches is not the same and I welcome the clarification by altering the heading of table 5.1. I therefore also understand that 7 caravans (on unauthorised developments in Chorley) would not necessarily translate to 7 pitches. However, the Council's response does not answer the initial question ie. that these unauthorised developments do not appear to have been taken into account in table 6.1**

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<sup>3</sup> It is generally acknowledged that these only provide a snapshot on one or two days of the year. But it can be an indicator of need.

**(need and supply). Are the unauthorised caravans shown in the caravan count data in Chorley on the same site as that which has been granted temporary planning permission? If not, then the unauthorised developments should appear in table 6.1, otherwise there is a level of need that is potentially being ignored.**

9. I note that for Preston there is a constant figure of 7 unauthorised pitches in July 2001, Jan 2012 and Jan 2013. This would suggest that it may be the same 7 pitches, but again this does not appear in the need and supply table.

*Council response (24.2.14)*

*This goes back to the interpretation of Table 5.1 which shows the number of caravans on unauthorised pitches so in the case of Preston there are seven caravans on unauthorised pitches – not seven unauthorised pitches. See points in Para 8 above.*

#### **Inspector's further comment dated 4 March 2014**

**This misses the main point as set out above i.e. that the figures do not appear in the need and supply table.**

10. Annual population increase – the DCLG guide says that information on the likely rate of household formation and assessments of future need should be based primarily on locally gathered evidence. In the event that this does not provide a clear picture a national average of 3-4% growth rate can be used. It also says that it may be unrealistic to try to forecast need for up to 15 years but that projections should be made for years 5-10.

*Council response (24.2.14)*

*Population increase has been based on primary sources of information – interviews with travellers and details on the demographics of each household. This has allowed a figure for household formation to be assessed up to 15 years (subject to annual monitoring and a five year review of the GTAA). Therefore no assumptions on population growth have been required.*

11. The study takes a 14 year time frame to 2026/27 (from 2013). Analysis of the local position indicates that only one new household is expected to form between 2013/14 and 2017/18. This would appear to be low and I would question the evidence for this figure.

*Council response (24.2.14)*

*The evidence for this is one member of an existing household that intends to set up a new household in the short term. Other members of the household are school children. Future aspirations for members of the extended family to locate here have also informed the assessment of need.*

#### **Inspector's further comment dated 4 March 2014**

**In order to be satisfied that this assessment is based on robust evidence, I would wish to see the evidence which demonstrates that none of the 25 remaining households surveyed have children of an age where they are likely to set up a separate household in the next 5 years.**

12. This figure increases between 2018/19 and 2027/28<sup>4</sup> to 26 new households. However, the GTAA assumes that half of these households will move away so, in the longer term, it assumes 13 new households requiring pitches. I would query the evidence on which this assumption is based as there is currently no turnover on existing sites, meaning that the current population is very settled. The one new household that is currently known about also intends to stay in this area. What is the evidence to support the assumption that these new households will have anywhere else to go when they form? The study appears to be assuming that other local authorities will be providing for that need i.e. it is factoring in out-migration in the future, with no corresponding in-migration.

*Council response (24.2.14)*

*This assumption is based on detailed demographics of the households interviewed and the fact that male children tend to form a household and female children move to a different household when they get married. In other words, the women tend to move to the men who are factored into a future need provision and therefore there is no issue of out-migration or in-migration in this respect.*

**Inspector's further comment dated 4 March 2014**

**I would question this assumption which is not borne out by my own experience. I am aware of several instances of gypsy families attempting to gain planning permission for pitches for daughters and their husbands as well as for sons and their wives. So it is by no means always the case that daughters move away. Furthermore, the evidence to demonstrate the detailed demographic is missing from the GTAA. It does not need to identify individuals.**

13. Waiting lists – no mention is made that any analysis has been carried out of the waiting list for the local authority site in Preston. This can be a further indicator of need (DCLG guide para 62).

*Council response (24.2.14)*

*Information on waiting lists proved to be scant and it was considered that it did not translate into a quantifiable need. The reality of the situation is also complicated by the fact that on a site of say Irish travellers, there will not be anyone from another group on its waiting list (English, Romany). Rather, pitches that become available are re-allocated through the existing community's contacts. Accordingly, the study has relied on primary sources of data (actual interviews and knowledge of demographics) which has proved a more accurate indicator of need. Any issues of travellers from surrounding authority areas wishing to locate in Central Lancashire will be progressed under the Duty to Cooperate.*

**Inspector's further comment dated 4 March 2014**

**Why is the evidence on the waiting list scant? I understood this to be a local authority site and records should therefore be available. What is the evidence to demonstrate that what data there is does not translate into quantifiable need. I accept that the surveys are an important part of the GTAA, but they are not the only indicator of need.**

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<sup>4</sup> The figure is adjusted to the Plan period ending 26/27

**In relation to the final sentence in the Council's response: how is this going to be accommodated if each local authority is providing only for its own need?**

14. Overcrowding – the report mentions (para 5.20) that a limited number of respondents in Preston felt that their home was overcrowded. This can be an indicator of concealed households. This does not appear to have been assessed or factored into the need.

*Council response (24.2.14)*

*In terms of overcrowding issues, the needs analysis looked at the actual make-up of every single household. It factored issues around 'actual' (not perceived) overcrowding into the objectively assessed need. Examples of perceived overcrowding include one or two caravans on a pitch accommodating all of the family members despite opportunities for up to three caravans to be located on a single pitch.*

**Inspector's further comment dated 4 March 2014**

**Accepted, but this evidence should be included in the revised GTAA.**

*Duration of the survey:*

15. The survey was carried out for 5 weeks from early September 2013. DCLG guidance suggests that this should be done for 6-9 months in order to take account of seasonal variations. See also the comments regarding unauthorised encampments at point 7. Could a longer survey period have attempted to reach those gypsies and travellers on unauthorised encampments?

*Council response (24.2.14)*

*The survey was indeed undertaken quickly in order to meet the Inspector's deadline. The 6-9 months referred to in the guidance is in order to capture issues around seasonal migration. The resident travellers interviewed were all asked detailed questions about members of their family's travelling habits which adequately capture this information (see questionnaire). In addition, the information on illegal encampments used was gathered over a three year period and this information has been factored into the assessment of need and is considered to adequately cover historic variations.*

**Inspector's further comment dated 4 March 2014**

**The initial comment was not intended as a criticism, it is accepted that both the Council and PINS have been attempting to resolve this issue as quickly as possible in order that the Council may proceed to adopt the current Plan.**

**The point being made is that a longer survey may capture more information relating to the unauthorised encampments. It is noted that this data covers a 3 year period but, in South Ribble, the GTAA acknowledges that the data on the duration of the encampments is 'sketchy'.**

**The production of a separate Gypsy and Traveller DPD would seem to provide the opportunity for a longer survey in order to ensure that these factors are robustly assessed.**

END.