

Appendix A: Technical Appendix

Specific Details to be Given in Responding to the 4NW Submitted Draft Plan Partial Review Consultation for Draft Policy L6 and Revised Policy RT2

1.1 Draft Policy L6 –Gypsy and Traveller Pitch Provision

1.2 **Summary of Draft Policy L6**

1.3 A key Government objective is providing decent homes for all. For Gypsies and Travellers this means ensuring that sufficient, suitable pitch provision is made throughout the region to meet the needs of these communities. Draft Policy L6 specifically deals with the scale and distribution of Gypsy and Traveller pitch provision across the North West Region. Table 7.2 in Policy L6 shows the pitch provision to be achieved by each individual North West authority by 2016. Halton is grouped with the Cheshire Sub-regional Partnership. This policy has a policy start date of 2007; therefore all accommodation provision since made from 2007 will be counted towards policy targets for pitch numbers. The policy makes a distinction between permanent and transit pitches.

1.4 Permanent Pitches

1.5 Draft Policy L6 indicates that Halton should provide by 2016 an **additional** minimum of 45 permanent pitches. The policy also indicates that a further 3% compound increase on an annual basis should be achieved to 2021 and for Halton this would be a further 13 permanent pitches. The policy therefore suggests that by 2021 Halton should provide a **total** of 98 permanent pitches (existing provision plus additional requirement).

1.6 Transit Pitches

1.7 The policy indicates that 5 additional transit pitches should be provided by Halton by 2016. However, as Halton's new site at Warrington Road provided 10 transit pitches, Halton will already have met and exceeded its allocated apportionment for transit pitches under the draft policy.

1.8 **Existing Provision in Halton**

1.9 The Council currently provides 23 pitches at Riverview Residential Caravan Site in Widnes. A new local authority run site was opened in January 2009 in Warrington Road, Runcorn, next to the existing private site. This new site provides 4 permanent pitches and 10 transit pitches. There are two private sites in Runcorn at Windmill Street and Warrington Road; these two sites provide 13 pitches. In total there are 40 permanent pitches and 10 transit pitches currently provided in Halton.

1.10 **Review of the Evidence Base Underpinning Draft Policy L6**

1.11 All sub-regions in the North West were surveyed by the Salford Housing and Urban Studies Unit (SHUSU) of the University of Salford who prepared Gypsy and Traveller Accommodation Assessments (GTAA's). The study for the Cheshire Partnership Area was undertaken in May 2007. A GTAA study for the whole North West was also published in May

2007 by SHUSU. In comparing the two studies, there is a difference in total identified need for the Cheshire Partnership area. In the Cheshire Study (table 37 page 125) total need is identified as 113 – 155. However, in the Regional Study the figure for the Cheshire Partnership area is shown as 140 – 177 (table ii, page 8 of the Executive Summary). It is not clear why the figures between the studies differ as the Regional Study indicates that figures are drawn from the Cheshire Study.

- 1.12 The figure of 190 contained in Draft Policy L6 for the Cheshire Sub regional Partnership has been apportioned, by no scientific method, to all those authorities in the Cheshire Partnership. This results in the following apportionments (Table 1):

Table 1: Comparison of Sub-Regional Proposals with Cheshire Evidence

LA	Cheshire GTAA Study		NWPPR Proposals	
	Permanent	Transit	Permanent	Transit
Cheshire East	37-54	25-37	60	10
Cheshire West	31-45		45	10
Halton	28-32		45	5
Warrington	6-9		10	5
St Helens	11-15		30	5
Total	113-155			190

1.13 The Cheshire Partnership GTAA

- 1.14 The Cheshire Partnership study concludes that the need for Halton will be 28 to 32 pitches from 2006 to 2016 (table 37 page 125). These pitch figures arise from the following sources: 3 from concealed households (adults / families living with extended family / other families), 3-6 from unauthorised encampment, 1-2 from household formation (young person approaching family age), 1 from bricks and mortar (householder wanting to move back into a caravan) and 20 from the Riverview waiting list (an issue considered in more detail in paragraph 1.19).

1.15 *Shortcomings with the Cheshire Partnership GTAA Evidence*

- 1.16 In terms of the families in bricks and mortar in Halton, and the implied need arising from the fact that a proportion “may” want to live on a site, there are serious economic consequences to building controversial developments on the off chance that there might be a demand. Most (although not all) Travellers go into bricks and mortar when they are too old or ill to continue travelling.

1.17 *Turnover of Pitches*

- 1.18 The study suggests that 10 pitches will become free and can be re-let and therefore this figure of 10 has been deducted from overall needs. The figures quoted for each authority in table 7.2 of Draft Policy L6 do not take account of estimated vacancy rates and re-lets (contributing to supply) on existing sites during the period. The Cheshire GTAA assessed this as 10 for Halton, and therefore 10 should be subtracted from any target set for Halton.

1.19 *Waiting Lists*

1.20 With the exception of Congleton, only Halton made available a site waiting list (for the Riverview Site) for the Cheshire GTAA study. It is important to note that only local authority sites tend to have waiting lists and the only local authority sites in the Cheshire Partnership area are in Halton, St Helens and Congleton. This lack of consistency with the evidence skews need artificially towards Halton. In the Cheshire GTAA 20 of Halton's predicted need arose from the use of an unmanaged waiting list. As a result of the RSS Partial Review stakeholder consultation closing in March 2009 the Council reviewed the Riverview Site list by speaking to those on it. The revised list has 10 names on it and these represent the current people asking for a pitch, claiming not to have a permanent pitch elsewhere and who would take one today if available. The Council has offered to make this list available to 4NW on a confidential basis to allow the evidence base to be updated with current information. The evidence should be updated to a revised waiting list figure of 10.

1.21 **The Council's Objection to Draft Policy L6**

1.22 The Council has previously objected to draft Policy L6 on the grounds that the policy does not follow the evidence produced in support of the policy. Halton already makes a significant contribution to Gypsy and Traveller accommodation needs when compared to pitch availability in surrounding districts and in terms of the Borough's geographic size. It is recommended that the Council continues to object to draft Policy L6 on the same grounds.

1.23 In Policy L6 the Halton apportionment figure has been given as 45 pitches. This represents 24% of the sub-regional apportionment. This represents nearly one quarter of the requirement, yet Halton is the smallest of these partners in terms of geographical area and has little land available to accommodate further provision. Some account should also therefore be taken of provision in the context of the geographical size of Councils (see Table 2), which would result in neighbouring authorities' targets being increased relative to Halton. There is little land available in Halton upon which to accommodate such large numbers of pitches. Halton requires the remaining deliverable and developable sites in the Borough for house building and employment land provision to fulfil the apportionments in RSS and deliver Growth Point. This is evidenced by the Halton Strategic Housing Land Availability Assessment and Joint Employment Land Study. Therefore, there are difficulties in practical terms, of trying to find appropriate sites upon which to locate such high numbers of additional pitches. The Council has just completed a site search exercise in relation to the new Runcorn site in Warrington Road. There were no alternative sites identified that would provide acceptable locations.

Table 2: Geographical Size of Cheshire Partnership Authorities

LA Name	Hectares	Additional Permanent Pitches
Halton	9033	45
St Helens	13638	30
Warrington	18237	10
Cheshire West and Chester	94,115	45
Cheshire East	116,638	60

- 1.24 Some attempt should be made to redistribute the assessed need for pitches to ensure a more even provision between Councils, particularly to those areas with little or no existing provision (Ellesmere Port and Neston - now part of Cheshire West and Chester -, Knowsley, Liverpool and Wirral), and should also focus on those Councils with no Council owned sites. The “need where it is seen to arise” problem is greatest for those LAs that have sites. DCLG (Department for Communities and Local Government) advice to regional planning bodies, contained in “Preparing Regional Spatial Strategy reviews on Gypsies and Travellers by regional planning bodies” page 51, advises that equity considerations suggest that pitch requirements might be dispersed from Authorities with existing provision to those with little or no provision.
- 1.25 For the above reasons, the Council does not feel that the evidence produced to support Draft Policy L6 substantiates the pitch provision figures for Halton. Greatest provision should be made in the areas highlighted by the Gypsy and Traveller communities and those authorities currently offering no local authority run sites. For Draft Policy L6, the figures resulting from the Partnership GTAA study should be used as the starting point for the RSS pitch targets and then proportioned in line with geographic area, existing provision levels, and the wishes of the Gypsy and Traveller community. The Cheshire Study identified that the Gypsy and Traveller community had suggested locations in Middlewich, Ellesmere Port, Winsford, Nantwich, Sandbach and the outskirts of Chester as locations of choice. Liverpool also appears to be a location of choice. In a note of a meeting held with Gypsies and Travellers on 19th December 2008 it was reported (Consultation Report, January 2009, CAG Consultants) that “many people still want to be in Liverpool but are being pushed out into Runcorn”. This statement would indicate that a greater proportion of pitch provision should be in the Merseyside Partnership area (Knowsley, Liverpool, Sefton and Wirral).

1.26 Revised Policy RT2 – Managing Travel Demand

The revision to Policy RT2 concerns proposed changes to the wording of the last bullet point of the current policy; a new Table 8.1; additional supporting text; and a completely revised appendix. Table 8.1 in the current published RSS (pages 73 and 74) will be replaced by the new proposed Table 8.1. The supporting text proposed in the consultation document will replace paragraph 8.8 on page 73 of the published RSS. Appendix RT(d) in the published RSS will be replaced by the proposed Appendix 1 included in the consultation document. It is important to understand that only these specific aspects of the proposed changes to Policy RT2 can be commented upon during the current consultation.

1.27 It is recommended that support is generally given for the principles of the proposed Regional Parking Standards (RPS) and the amendments reflecting previous comments made by this authority during earlier stages of consultation are welcomed. The document is concise and quite easy to understand. However, in the interests of policy clarity, the Council ought to raise several issues on this draft as follows:

1.28 *Supporting Text (page 15)*

Paragraph 30 – Heavy Goods Vehicles (HGV) are referenced in the supporting text however HGV parking standards are not included in the Table 8.1.

1.29 *Table 8.1 (page 16)*

Class A1 (retail warehouse) - the definition of this use is unclear - for some types of retail, this may lead to insufficient parking. DIY stores, for example - do have lower parking demand than the usual non food retail - but the provision of only half as many spaces may result in problems, especially at busy periods such as bank holidays.

1.30 Class C2 (nursing home/sheltered accommodation) - the standard seems incorrect as it results in more parking as an area becomes more urban.

1.31 Class C3 (dwelling houses) - comment box should quote 'large' garage for cycle storage as per Manual for Streets.

1.32 Class D1 (schools) - it would be helpful to have some further guidance on applying the difference between primary and secondary; places of worship - concerns that the standard is too generous, leading to too much parking being provided (or required) especially for areas B&C.

1.33 For clarity - is petrol filling station parking provision 'at the pump' - if not the standard seems very generous, if shops are to be considered separately.

1.34 *Accessibility Questionnaire (page 25)*

Note 6 on the Accessibility Questionnaire (page 27) - it is considered that account should also be taken of the estimated modal split and

required demand management measures put forward as part of the Transport Assessment process, when determining appropriate parking levels, provided those measures can be appropriately conditioned and enforced.

1.35 Any proposals to produce an electronic calculator version of the guidance, and/ or supporting case studies of how the approach would work in practice would be welcomed.

1.36 *Reduction in Parking Standards in relation to Local Accessibility Rating (page 28).*

It would be helpful to know, under what circumstances the maximum standards for dwelling parking can be reduced, if the accessibility questionnaire is not to be applied. For example - even in some area type C's in Halton only 1.5 spaces are provided per 2 bed apartment and this seems to work well.

1.37 *Residential Parking (page 29)*

The comment in Appendix 1 (viii) regarding a reduction in standards for unallocated parking is welcomed - this generally works well, but only for larger apartment schemes where there is always likely to be a proportion of residents away from home. Some of our members have noted problems with abuse of parking bays by non residents, however. The later comment regarding garage spaces being counted, should quote 'large' garages as per Manual for Streets.