

WIRRAL COUNCIL

CABINET – 19 MARCH 2009

REPORT OF THE DEPUTY CHIEF EXECUTIVE AND DIRECTOR OF CORPORATE SERVICES

REGIONAL SPATIAL STRATEGY – PARTIAL REVIEW – CONSULTATION ON DRAFT INTERIM POLICIES

EXECUTIVE SUMMARY

The Regional Leaders Forum (4NW) has published Draft Interim Policies as the next stage in the Partial Review of the Regional Spatial Strategy for the North West. Following discussions with the Government, the scope of the Review has been amended and will now only cover policies for gypsies and travellers, travelling showpeople and parking standards. The remaining issues will be reviewed as part of the emerging single Regional Strategy which is the subject of a separate consultation process.

The deadline for comments on the Draft Interim Policies for gypsies and travellers, travelling showpeople and parking standards is 27 March 2009. This report recommends that the Directors Comments set out within the body of this report form the basis of the Council's response to 4NW.

1 Background

1.1 The Secretary of State published the latest Regional Spatial Strategy in September 2008 (Cabinet, 6 November 2008, Minute 257 refers). Prior to publishing the final Strategy, the Secretary of State indicated that there would be a need for an immediate Partial Review. Initially the Partial Review was to cover issues related to housing, gypsies and travellers, travelling showpeople, waste management, renewable energy and parking standards. The Council considered the emerging options for these issues in June last year (Cabinet, 26 June 2008, Minute 94 refers).

1.2 The scope of the Review was revised in September 2008 in light of

- changing circumstances in the housing market;
- the need to get a more complete evidence base on a number of issues including housing land availability and infrastructure capacity;
- feedback from stakeholders on the Options consultation exercise in June 2008;
- the policy position that was emerging in the publication of the final version of RSS; and
- work commencing in the North West on a Regional Strategy ahead of emerging legislation for a Single Regional Strategy.

- 1.3 The Partial Review will now only consider policies for gypsies and travellers, travelling showpeople and parking standards. Interim Draft Policies for these issues were published for consultation on 20 January 2009. The content of these policies is considered below.
- 1.4 Progress on the single Regional Strategy is the subject of a separate consultation process.

2 Content

- 2.1 Copies of the Interim Draft Policies for each topic are provided as Appendices to this report.
- 2.2 Respondents are being asked to indicate whether they support the Interim Draft Policies and the figures being proposed, alongside the reasons for their response. Respondents are also asked to provide any comments on the supporting text and to suggest any additional information or evidence that they would like 4NW to consider.
- 2.3 The deadline for comments is 27 March 2009.

3 Accommodation for Gypsies and Travellers

Background

- 3.1 National policy and racial equality legislation requires provision to be made by every district council where accommodation is needed by gypsies and travellers. Sites must be provided to prevent illegal and unauthorised encampments in inappropriate areas and to tackle poor living conditions, including lack of water, toilets, showers, electricity, waste disposal and limited access to health and education. Residential pitches are required for long-stay accommodation and transit sites are required to accommodate short stay visits.
- 3.2 Gypsies and Travellers are defined as persons of nomadic habit of life including those who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily or permanently, excluding members of an organised group or travelling showpeople or circus people travelling together as such.
- 3.3 There are currently 955 authorised pitches for gypsies and travellers across the North West. Earlier sub-regional assessments had indicated a need for up to 950 additional residential pitches and 248 additional transit pitches across the Region by 2016. The assessment for Merseyside (the Merseyside Gypsy and Traveller Accommodation Assessment (GTAA), February 2008) identified a requirement for 10 residential pitches in Wirral and for 10 additional transit pitches across Knowsley, Liverpool, Sefton and Wirral.
- 3.4 Wirral does not have any recognised sites for gypsies and travellers.

Draft Policy Content

- 3.5 The Draft Interim Policy L6 (provided at Appendix 1 to this report) seeks to provide at least 1,250 net additional residential pitches and at least 270 transit residential pitches within the North West Region by 2016. Beyond 2016 the policy provides for a further increase, equivalent to 3% each year. A coordinated review of future needs will be undertaken in 2013. Temporary accommodation in connection with festivals and other similar annual events is not included in the requirements for transit pitches.
- 3.6 Draft Policy L6 would require the Council to take account of the specific needs of different groups of gypsies and travellers; work to achieve the levels of provision for 2016 as soon as possible; and make provision on a range of sites and tenures. Provision should include opportunities arising from new major developments and the identification of sufficient sites in Local Development Documents.
- 3.7 Rural exception sites and the alteration of Green Belt boundaries should be considered, where necessary, to make the required levels of provision. Cross boundary working on joint Local Development Documents is encouraged and could allow the figures to be redistributed.

District Level Figures

- 3.8 The district level figures for gypsies and travellers being suggested for Wirral are set out below.

Table 7.2 - Scale and Distribution of Gypsy and Traveller Pitch Provision for Wirral	
<i>Permanent Residential Pitches</i>	
Current Authorised Provision 2007	0
Minimum Additional Permanent Residential Pitches Required 2007 to 2016	10
Proposed Provision of Permanent Residential Pitches at 2016	10
<i>Transit Residential Pitches</i>	
Minimum Additional Transit Residential Pitches Required 2007 to 2016	5

Supporting Text

- 3.9 The supporting text suggests that there is an urgent need to address a shortage of suitable accommodation across the region (paragraph 3) and re-states that provision for gypsies and travellers is part of the Government's objective of providing decent homes for all (paragraph 1).

- 3.10 The figures proposed are said to take account of the needs of those currently resident in the area, natural change and net movements between other forms of accommodation. An additional allowance has now also been made for “hidden” overcrowding, undetected in earlier sub-regional assessments (paragraph 4).
- 3.11 The current pattern of provision across the Region is uneven. The Interim Draft Policy seeks to broaden choice and widen the geographical distribution by providing pitches where little provision has previously been made (paragraph 5). This follows the earlier decisions of the Regional Leaders Forum to ensure a more balanced share of meeting need across districts and to reflect a wider range of factors than “need where it arises”.
- 3.12 The Interim Draft Policy also seeks to reduce unauthorised encampments by providing places to stop without the threat of constant eviction or resorting to stopping illegally or inappropriately (paragraph 6).
- 3.13 A wide range of factors should be considered when identifying suitable sites including access to local services such as schools, shops, health and other community facilities, electricity, water and sewerage connections, the amenity of nearby residents and land uses, the character and appearance of the countryside, easy and safe access to the road network and the need to prevent overcrowding (paragraph 8). Current working patterns (paragraph 9) and the need to allow for both residential and business activities (paragraph 10) should also be considered.
- 3.14 Green Belt locations should only be brought forward through the plan making process, when all the available alternatives have been discounted (paragraph 12).

Results of Previous Consultation

- 3.15 In response to the previous Options Consultation, the Council supported Option 3 – distribution on a sub-regional basis as this would allow a sub-regional partnership to consider the local pattern of provision, linked to the actual requirements of the gypsy and traveller community.
- 3.16 In response to an earlier informal consultation on the emerging figures, undertaken between 24 November 2008 and 2 December 2008, which proposed 980 additional residential pitches and 269 additional transit pitches for the Region, including 10 residential and 5 transit pitches in Wirral, officers provided the following holding reply:

“Wirral Borough Council cannot accept these figures. It is not appropriate to consider these matters as part of an informal process as decisions on matters like this require high level political endorsement which is not possible in the timescales provided.

With regard to gypsies and travellers, at Issues and Options the Council supported Option 3 – working with sub-regional partnerships to allow cross boundary working. The Merseyside GTAA recommended a strategic approach. The Merseyside GTAA stated the split between local authorities as indicative only and that the numerical results of the apportionment should not necessarily be assumed to imply that those needs should actually be met in that specific locality.

Wirral has had repeated nil caravan counts and has had no recent encampments.

The draft requirement for transit pitches at 5 per district or 20 in total far exceeds the need for only 10 transit pitches identified in the Merseyside GTAA across the sub-regional partnership as a whole. A need for 5 transit pitches in Wirral is not proven.”

- 3.17 Although the overall figures for the North West have been increased further to 1250 residential pitches and 270 transit pitches, 4NW’s proposed requirement for Wirral of 10 residential pitches and 5 transit pitches has remained unchanged.

Stakeholder Workshop

- 3.18 Housing and planning officers attended a 4NW workshop on 27 February 2009, where some additional explanations were provided.
- 3.19 The Options Consultation has led the Regional Leaders Forum to set a clear policy direction – to promote a more balanced share of meeting needs across districts, to reflect a wider range of factors than just “need where it arises”.
- 3.20 The sub-regional GTAAs have been used as a starting point. The latest figures are based on the results from informal consultation in November 2008 and a workshop with representatives of the Gypsy and Traveller community in December 2008. The workshop identified “hidden” overcrowding, initially estimated at 70% of the provision identified in GTAAs. The figures for most authorities have, as a result, been modified upwards, using the proportions identified in sub-regional GTAAs as a control. This has not, however, been based on a precise mathematical formula.
- 3.21 Figures have been allocated in multiples of 10 or 15, as the minimum viable size for the provision and operation of a permanent residential site.
- 3.22 Figures for transit pitches have been based on the history of unauthorised encampments recorded in GTAAs and have been applied in multiples of five, as the minimum viable size for the provision and operation of a transit site, depending on the scale of the history of unauthorised encampment.

Directors Comments

- 3.23 The resultant figures for Wirral for permanent residential pitches reflect the findings of the previous Merseyside GTAA and are low compared to surrounding districts.
- 3.24 For example, Liverpool will be required to provide 25 residential pitches in addition to the 14 they provide already plus 5 transit pitches; Sefton will be required to provide 30 residential pitches in addition to the 16 they provide already plus 5 transit pitches; and Cheshire West and Chester will be required to provide 80 residential pitches in addition to the 55 they provide already plus 10 transit pitches. Knowsley’s requirements are the same as for Wirral.
- 3.25 Many of these figures have been increased to take account of hidden overcrowding. Wirral has not been given any additional allocation for hidden overcrowding.

- 3.26 The requirement for 5 transit pitches per district (20 in total), nevertheless, exceeds the findings of the Merseyside GTAA, which identified a need for only 10 transit pitches across the sub-regional partnership area as a whole.
- 3.27 The twice-yearly caravan counts have shown a nil return for Wirral for at least ten years and there has been no record of unauthorised encampments since December 2006. There were, however, 22 unauthorised encampments during the previous four years, the maximum number of caravans present being nineteen.
- 3.28 No evidence has been provided on working and/or travelling patterns in support of the figures proposed.
- 3.29 The figures in Draft Interim Policy L6 are expressed as “at least” and the figures in Table 7.2 are the minimum to be provided and would not provide a ceiling where additional local need can be demonstrated.

Recommendation 1

Support Interim Draft Policy L6 – No

Why – Wirral Council has a firm and stated commitment to work closely with its partners to ensure that everyone living, visiting and working in the Borough will be treated fairly and with respect regardless of their race, gender, age, disability, sexual orientation or faith. However, in this case the Council is concerned that Draft Interim Policy L6 and the proposed pitch distribution figures set out in Table 7.2 are not supported by the available evidence.

In particular, it is not clear why the resultant numbers for the Region should exceed the needs assessed in sub-regional GTAAs prepared in accordance with national advice, especially as the figures in Draft Interim Policy L6 are already expressed as “at least” and the figures in Table 7.2 are expressed as the minimum to be provided. While the supporting text refers to an additional allowance for hidden “overcrowding”, it is not clear how this has been assessed and applied to each district.

The statement that where Local Development Frameworks look beyond 2016 provision will be made for the same proportion of the regional requirement as in Table 7.2 for 2007-2016 is not clear. It is, for example, not clear whether the annual 3% compound increase to be applied post-2016 will be applied pro-rata at district level, irrespective of evidence of local need or demand.

The requirement for new major developments to include provision for gypsies and travellers is unduly restrictive and poorly defined in terms of the types of land use or development being considered and appears contrary to the intention to identify sites through Local Development Frameworks.

The Policy text with regard to sites in the Green Belt should better reflect the comments provided in the supporting text, which make it clear that this option should be a last resort, in exceptional circumstances, where all other alternatives have been exhausted.

While the text on the possibility of redistributing provision through the preparation of joint or co-ordinated Local Development Documents is welcome, the implications of a “co-ordinated” approach should be clarified in the supporting text for the avoidance of doubt.

Support pitch distribution figures - No

Why – The assumption that every district should be required to make provision, unrelated to actual need or demand, is flawed. Wirral, for example, as a peninsula, is not a traditional resort for gypsies and travellers. The Borough has had nil caravan counts for at least 10 years and no record of unauthorised encampments since December 2006, suggesting that provision on the scale envisaged may rarely, if ever, be used.

The Merseyside GTAA recommended a strategic approach and stated the split between local authorities was indicative only and that the numerical results of the apportionment should not necessarily be assumed to imply that those needs should actually be met in that specific locality. This is re-iterated in footnote 4 to paragraph 5 of the supporting text. No evidence has been provided on working and/or travelling patterns in support of the figures proposed.

The number of transit pitches identified for the Merseyside Sub-Regional Partnership area far exceeds (doubles) the local assessment carried out as part of the Merseyside GTAA. The statistical basis for this higher figure is not apparent and it is, for example, unclear how this is related to assessed need.

Comments on the supporting text – The supporting text should explain how “hidden” overcrowding and transit provision has been assessed, identified, verified and applied. Further information should also be provided on current working and travelling patterns in support of the figures proposed.

4 Accommodation for Travelling Showpeople

Background

- 4.1 The issues arising for travelling showpeople are similar to those for gypsies and travellers in terms of the Government’s objective of providing decent homes for all. Travelling showpeople require permanent yards for living accommodation and the storage of equipment, rides, stalls and vehicles. Existing sites are often too small, leading to overcrowding, illegal parking and health and safety issues.
- 4.2 Travelling showpeople are defined as members of a group organised for the purpose of holding fairs, circuses or shows (whether or not travelling together as such) including such persons who on the grounds of their own or their family’s or dependents’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, excluding gypsies or travellers.
- 4.3 There are over 20 existing yards within the Region, mainly concentrated in and around Greater Manchester, providing up to 492 existing plots across the North West. Earlier sub-regional assessments had indicated a need for up to 258

additional plots across the Region to 2016. The assessment for Merseyside (the Merseyside Gypsy and Traveller Accommodation Assessment (GTAA), February 2008) did not identify any need in Knowsley, Liverpool, Sefton or Wirral.

- 4.4 Wirral does not have any recognised plots for travelling showpeople.

Draft Policy Content

- 4.5 Interim Draft Policy L7 (provided at Appendix 2 to this report) seeks to provide at least 285 net additional plots for travelling showpeople within the North West Region to 2016. Beyond 2016, the policy provides for a further increase, equivalent to 3% each year. A coordinated review of future needs will be undertaken in 2013. Temporary stopping places in connection with festivals and other similar annual events are not included in the requirement for plots.
- 4.6 Draft Policy L7 would require the Council to take account of the specific needs of different groups of travelling showpeople; work to achieve the levels of provision for 2016 as soon as possible; and make provision on a range of sites and tenures. Provision should include opportunities arising from new major developments and the identification of sufficient sites in Local Development Documents.
- 4.7 Rural exception sites and the alteration of Green Belt boundaries should be considered, where necessary, to make the required levels of provision. Cross boundary working on joint Local Development Documents is encouraged and could allow the figures to be redistributed.

District Level Figures

- 4.8 The district level figures for travelling showpeople being suggested for Wirral are set out below.

Table 7.3 - Scale and Distribution of Travelling Showpeople Plot Provision for Wirral	
Current Authorised Provision 2007	0
Minimum Additional Plots Required 2007 to 2016	5
Proposed Provision of Plots at 2016	5

Supporting Text

- 4.9 The supporting text explains that travelling showpeople are often self employed business people who travel the country, often with their families, holding fairs and that many have done so for generations. Their work is mobile but requires secure, permanent bases, which could be permanently occupied by some members of the family, including children (paragraph 3).
- 4.10 There is an urgent need to address a shortage of suitable accommodation across the region (paragraph 4) and the figures proposed by 4NW are to take account of the needs of those currently resident in the area and natural change (paragraph 5).

- 4.11 The current pattern of provision across the Region is uneven. The Interim Draft Policy seeks to broaden choice and widen the geographical distribution by providing plots where travelling showpeople would like to live but little provision has been made (paragraph 6). Working patterns and the logistics of travelling are important considerations (paragraph 7) and sites must be suitable for both business and residential uses (paragraph 8).
- 4.12 The factors to be considered when identifying suitable sites are similar to those for gypsies and travellers (paragraph 9) and a similarly restrictive approach should be taken to the use of sites in the Green Belt (paragraph 11).

Results of Previous Consultation

- 4.13 In response to the previous Options Consultation, the Council supported Option 1 – distribution on the basis of need where it arises on the basis that no need had been identified for Merseyside to 2011 and that there appeared to be no current need or demand for a permanent site within Wirral. This appeared to reflect logistical issues, such as access to the motorway network and the pattern of fairs across the region.
- 4.14 In response to an earlier informal consultation on the emerging figures, undertaken between 24 November 2008 and 2 December 2008, which proposed 325 additional plots for the Region, including 1 in Sefton and 2 in Wirral, based on a Showmans Guild Preference Survey, officers provided the following holding reply:

“Wirral Borough Council cannot accept these figures. It is not appropriate to consider these matters as part of an informal process as decisions on matters like this require high level political endorsement which is not possible in the timescales provided.

With regard to travelling showpeople, at Issues and Options the Council supported Option 1 – distribution on the basis of existing need where it arises. The Merseyside GTAA showed no need or demand for pitches for travelling showpeople within the sub-regional partnership area.”

- 4.15 Although the overall figures for the North West have been reduced to 285, the requirements for Sefton and Wirral have been raised to 5 plots each. No provision is still being required in Knowsley or Liverpool. Cheshire West and Chester are being required to provide 10 plots in addition to the 13 they already provide.

Stakeholder Workshop

- 4.16 Housing and planning officers attended a 4NW workshop on 12 February 2009, where some additional explanations were provided.
- 4.17 The proposed figure for plots in Wirral for travelling showpeople does not reflect the findings of the earlier Merseyside GTAA because of a weakness in the national methodology for GTAAs, which does not address the needs of people, like travelling showpeople, who are not already resident in the Borough.
- 4.18 The figures proposed in the Interim Draft Policy have been based on a Showmans Guild Preference Survey, completed in Autumn 2007. The Survey shows where

travelling showpeople within the region currently live and work and indicates where, if given a choice, they would prefer to be based. Preferences were expressed for Sefton and Wirral but were not expressed for Liverpool, Knowsley, Halton, Ellesmere Port and Neston or Chester.

- 4.19 The increase to five plots is based on the minimum viable size for a permanent base for travelling showpeople and district allocations across the region have all been expressed in multiples of five.
- 4.20 As a general rule, one acre of land (0.4 hectares) can accommodate ten showmen's caravans and their accompanying vehicles and equipment. Ideally these should be provided in half acre areas (0.2 hectares) which can accommodate an extended family of five showmen, with their caravans, vehicles and equipment.
- 4.21 Travelling showpeople would prefer to own their own site and to locate within an industrial or commercial area to allow for the movement, storage and maintenance of their equipment and to minimise any potential conflict with neighbouring residential property.

Directors Comments

- 4.22 Despite the evidence provided by the Showmans Guild Preference Survey it is still not clear why Wirral and Sefton have been identified as preferred locations for permanent bases given the pattern of activity within the wider sub-region, including north Cheshire and North Wales. The use of the term "the Wirral" may also indicate a geographical confusion with the wider peninsula.
- 4.23 Appendix 3 of the Preference Survey expresses the number of recorded preferences for a location within Wirral MBC as "1.16". This implies that the figure has been apportioned in some way and may not, therefore, represent a focussed preference for a site in Wirral. The underlying data has not been provided. For these reasons, it is recommended that the Council does not support the Interim Draft Policy until further information has been provided.
- 4.24 The figures in Draft Interim Policy L7 are expressed as "at least" and the figures in Table 7.3 are the minimum to be provided and would not provide a ceiling where additional local need can be demonstrated.

Recommendation 2

Support Interim Draft Policy L7 – No

Why – Wirral Council has a firm and stated commitment to work closely with its partners to ensure that everyone living, visiting and working in the Borough will be treated fairly and with respect regardless of their race, gender, age, disability, sexual orientation or faith. However, in this case the Council is concerned that Draft Interim Policy L7 and the proposed pitch distribution figures set out in Table 7.3 are not fully supported by the available evidence.

The statement that where Local Development Frameworks look beyond 2016 provision will be made for the same proportion of the regional requirement as in

Table 7.3 for 2007-2016 is not clear. It is, for example, not clear whether the annual 3% compound increase to be applied post-2016 will be applied pro-rata at district level, irrespective of local need or demand.

The requirement for new major developments to include provision for travelling showpeople is unduly restrictive and poorly defined in terms of the types of land use or development being considered and appears contrary to the intention to identify sites through Local Development Frameworks.

The Policy text with regard to sites in the Green Belt should better reflect the comments provided in the supporting text, which make it clear that this option should be a last resort, in exceptional circumstances, where all other alternatives have been exhausted.

While the text on the possibility of redistributing provision through the preparation of joint or co-ordinated Local Development Documents is welcome, the implications of a “co-ordinated” approach should be clarified in the supporting text for the avoidance of doubt.

Support pitch distribution figures - No

Why – The Showmans Guild Preference Survey, on which the proposed distribution figures are based, does not explain why Wirral was identified as a preferred permanent base while surrounding districts such as Liverpool, Knowsley, Ellesmere Port and Chester were not identified, especially given the pattern of activity recorded across the wider sub-region including north Cheshire and North Wales. It is not evident, for example, why Wirral would be preferred ahead of a more accessible site in Cheshire West and Chester.

The reference in Appendix 3 of the analysis of the Preference Survey to the number of preferences for a preferred base location in Wirral MBC as “1.16” implies that the underlying figures have been apportioned in some way and may not, therefore, represent a focused preference for a site in Wirral. It is not clear how the figures in Appendix 3 (for single preferences) and the figures in Appendix 4 (for multiple preferences) relate. The use of the term “the Wirral” in some parts of the report could also indicate a potential confusion in the Survey responses between the Metropolitan Borough of Wirral and the rest of the Wirral peninsula. The underlying data has not been provided.

It is not clear whether the preferences recorded in the Survey relate to single plots or groups of plots (extended families). Assuming that they relate to single plots, the scale of preference indicated for Wirral would not appear to be strong enough to justify the identification of a 5 plot site in Wirral. The higher figure would not be justified where the figures in Draft Interim Policy L7 are already expressed as “at least” and the figures in Table 7.3 are expressed as the minimum to be provided.

Comments on the supporting text – The supporting text should provide a further explanation of how the figures proposed for individual districts have been arrived at and verified. Further information should also be provided on current working and travelling patterns in support of the figures proposed.

5 Parking Standards

Background

- 5.1 The Regional Parking Standards contained within the Regional Spatial Strategy issued in September 2008 were the same as those contained in RPG13 (March 2003). Unlike other regions, the North West has not yet seen a reduction in the proportion of people using the car as their normal method for travel to work. The Regional Leaders Forum believes that increasing the provision for parking is unlikely to reverse this trend or help to reduce the volume of traffic and emissions.
- 5.2 There was a previous commitment to review the Regional Parking Standards every five years. Consultants have now recommended expanding the standards, to include cycle, motorcycle, coach, HGV and disabled parking and to include an assessment of the actual accessibility of each development site by different modes of transport. The consultants report can be viewed at http://www.nwra.gov.uk/documents/?page_id=4&category_id=205
- 5.3 The Council's own parking standards were last reviewed as part of the preparation of SPD4, adopted in June 2007, based on joint work undertaken in support of the Merseyside Local Transport Plan.

Draft Policy Text

- 5.4 The Regional Leaders Forum propose to amend the final bullet point in Policy RT2 – Managing Travel Demand (RSS, September 2008) to read:
- “Plans and strategies...should...incorporate maximum parking standards that are in line with or more restrictive than Table 8.1 and define areas where more restrictive standards should be applied based on the approach outlined in Appendix 1. Parking for disabled people, motorcycles and cycles are the only situations where minimum standards will be applicable.”*
- 5.5 The supporting text and revised Table 8.1 and Appendix 1 are provided at Appendix 3 to this report.

Supporting Text

- 5.6 The supporting text sets out a revised approach to parking standards based on a combined assessment of the general location of development and the actual local accessibility of individual sites, with more restrictive standards being applied to sites with the highest level of public transport accessibility (paragraph 2).
- 5.7 This is a two stage process. Firstly, the Council will need to classify every area within the Borough between three predefined Area Access Categories, broadly defined as major city and town centres; more local district centres; and other areas (page 7 of Appendix 3 to this report refers). Secondly, the Council will need to assess the actual accessibility of individual sites by a choice of means of transport. This will involve the application of a pre-defined accessibility questionnaire to score each site against a series of criteria related to walking, cycling, access to public

transport and the frequency of public transport services (pages 8 to 10 of Appendix 3 to this report refer).

- 5.8 Residential development, car showrooms and petrol filling stations are not subject to the additional assessment by questionnaire (pages 4 to 5 of Appendix 3 to this report refer). Residential development is subject to additional advice based on the Area Accessibility Categories and the number of bedrooms (pages 11 to 12 of Appendix 3 to this report refer).
- 5.9 Special cases such as hot food takeaways, boarding schools, residential colleges and training centres, secure residential units, law courts, outdoor leisure, amusement arcades, night clubs, laundrettes, hospitals, airports, ports, arena, stadia and events venues are excluded from the standards table and subject to separate advice (pages 12 to 15 of Appendix 3 to this report refer).

Results of Previous Consultation

- 5.10 In response to the Options Consultation, the Council supported the adoption of revised standards as this would support the joint work already undertaken by the Merseyside Districts as part of the Local Transport Plan.

Directors Comments

- 5.11 While the new approach will be more complicated and time consuming to apply, the results are likely to be more sensitive to local circumstances and the actual accessibility of individual locations. The approach will also lend further support to the joint work already being undertaken in support of the Merseyside Local Transport Plan. The transparency of the scoring system should also be beneficial to developers, when seeking to score their own sites.
- 5.12 The Council's existing Supplementary Planning Document 4 – Parking Standards does not fully reflect the approach now proposed. It does not, for example, follow a scoring approach to the assessment of each individual site and applies only two area accessibility categories, which it applies only to town centres uses.
- 5.13 The Area Accessibility Categories, Accessibility Questionnaire and the revised approach to residential parking will need to be incorporated into the Council's Local Development Framework, through the emerging Core Strategy Development Plan Document and a review of Supplementary Planning Document 4 – Parking Standards.
- 5.14 The Director of Technical Services has provided detailed comments related to residential parking, garage spaces and hospitals, which have been included under Recommendation 3 below.

6 Recommendation 3

Support Interim Draft Policy for Parking Standards – Yes

Why – The approach proposed is likely to be more locally sensitive and would lend further support to initiatives already in place to support the implementation of the Merseyside Local Transport Plan.

Support the parking standards proposed in Table 8.1 - No

Why – The standards as a whole appear to provide a comprehensive approach to the range and types of use most likely to require consideration. Wirral Council does not, however, fully agree with the approach to residential standards or hospitals.

The proposed standards for residential parking for Area Accessibility Category B would allow a maximum of 2 parking spaces for 2 to 3 bedroom dwellings and 3 spaces for 4 plus bedroom dwellings. This seems high for 2 bedroom accommodation and could provide an excess of parking for developments containing 2 bedroom dwellings, especially for flat developments with a mix of 1 and 2 bedrooms flats. It may, therefore be more appropriate to have 1 to 2 bedroom dwellings grouped together to provide a maximum of 0.5 to 1 space in Area Accessibility Category A and 1 space in Area Accessibility Category B. Table 8.1 and Figure 7.1 should be amended accordingly.

Wirral Council's current guideline is 1.5 spaces per dwelling. The proposed standards would double this for dwellings with 4 plus bedrooms and would go against the Council's commitment to encourage sustainable travel within the Borough. It may, therefore, also be more appropriate to have 3 and 4 plus bedroom dwellings grouped together to provide a maximum of 1.5 spaces in Area Accessibility Category A and 2 spaces in Area Accessibility Category B. Although still above the Council's current maximum of 1.5 spaces, this may be an acceptable compromise. Table 8.1 and Figure 7.1 should be amended accordingly.

The proposed approach to garage space, combined with the high levels of parking proposed, could provide a loophole that could be exploited to provide excessive parking. For example, a 4 plus bedroom dwelling in Area Accessibility Category B could potentially have 3 parking spaces plus garage spaces. The following amended wording is, therefore, suggested - "Garage spaces are not included within the space provision. However, if a development provides garages then, where possible, protecting the long term use for the storage of a vehicle by appropriate planning conditions should be sought."

The proposal to exclude hospitals from the parking standards could be seen as encouraging car travel and could undermine local attempts to encourage more sustainable travel to hospital sites. The following amended wording is, therefore, suggested - "A local parking standard for hospitals has a level of 1 car parking space per 4 staff and 1 space per 3 day visitors. However, in today's society hospital sites are multi-occupancy developments, which cater for more than just the district general hospital. To provide a true reflection of the complex range of uses on such sites a more detailed analysis of the land use should be provided to calculate the parking standard on a case-by-case basis."

Comments on the supporting text – Clarification should be provided that the sections of the Accessibility Questionnaire related to public transport apply equally to other forms of public transport such as the Mersey Ferries. Further information should also be provided on how the results of the scoring associated with the Accessibility Questionnaire should be used and on the practical implications of various scores or bands of scores when calculating any reduction in the number of

spaces that would normally be permitted in terms of the scales of reduction envisaged for any particular site or type of use.

7 Future Timetable

- 7.1 The timetable for the remaining stages in the preparation of the Partial Review is set out below. The next opportunity for the Council to comment will be after the final Draft Policies have been submitted to the Secretary of State for public examination, in July 2009.

Stage	Consultation period
Consultation on Interim Draft Policies	20 January 2009 to 27 March 2009
Consultation on Submitted Draft RSS	12 weeks from July 2009
Examination in Public	March 2010
Consultation on Secretary of State's Proposed Changes	8 weeks from September 2010
Final Issue	December 2010

- 7.2 The timetable for the preparation of the single Regional Strategy will be reported separately.

8 Financial Implications

- 8.1 There are no financial implications arising directly from this report.
- 8.2 The provision of sites for Gypsies and Travellers and Travelling Showpeople may have financial implications if the sites were to be provided and/or managed by the Council. The provision of sites for Gypsies and Travellers and Travelling Showpeople may also have financial implications for the provision of wider Council services.
- 8.3 The cost for the Council to provide a permanent residential facility for Gypsies and Travellers of the size being suggested in the Partial Review has been estimated to be in the order of £1.2 to £3.0 million, from initial calculations based on the experience of other authorities and national average costs. Costs are dependent upon local land values and it is, therefore, difficult to predict costs where site locations have not been identified. These figures do not include provision for transit pitches. If required to be progressed, this scheme would need to be submitted for inclusion in the Council's Capital Programme.
- 8.4 Capital grants are available from CLG for up to 100% of the costs of acquiring land and developing suitable sites. However, the annual bidding rounds, which are usually announced in March each year, are very competitive with only 2 grants available per year for the North West area as a whole.
- 8.5 A review of the Council's Supplementary Planning Document – Parking Standards would cost in the order of £7,500, split over two financial years, which could be met from existing resources.

9 Staffing Implications

- 9.1 There are no staffing implications arising directly out of this report.
- 9.2 Staffing implications will arise from any future need to present the Council's case at any future Public Examination into the Partial Review, which could have implications for progress on the preparation of the Council's Core Strategy Development Plan Document.
- 9.3 The provision of sites for Gypsies and Travellers and Travelling Showpeople may have staffing implications if the sites were to be provided and/or managed by the Council. The provision of sites for Gypsies and Travellers and Travelling Showpeople may also have staffing implications for the provision of wider Council services.
- 9.4 The requirement to undertake additional site specific assessments to satisfy the amendments proposed to RSS Policy RT2 will have staffing implications for the Technical Services Department. The need to review Supplementary Planning Guidance Document 4 – Parking Standards will have staffing implications for the Corporate Services Department.

10 Equal Opportunities Implications

- 10.1 Provision for Gypsies and Travellers is subject to racial equality legislation.
- 10.2 Romany Gypsies and Irish Travellers have been specifically recognised by the courts as ethnic groups covered by the Race Relations Act 1976 and the Commission for Racial Equality recommends that all local authorities include sub-categories for Gypsies and Irish Travellers within ethnic monitoring forms. There is a requirement that local authorities seek to promote good race relations between Gypsies and Travellers and the settled community.
- 10.3 The Regional Parking Standards will make specific provision for disabled people.

11 Community Safety Implications

- 11.1 There are no community safety implications arising directly out of this report.

12 Local Agenda 21 Implications

- 12.1 Provision for Gypsies and Travellers and Travelling Showpeople and parking standards will have implications for Local Agenda 21.
- 12.2 The policies and proposals contained within the Partial Review will be subject to statutory appraisal processes including sustainability appraisal, strategic environmental assessment and Habitats Regulations Assessment on which the Council will be able to comment.

13 Planning Implications

- 13.1 The policies and proposals contained within the Partial Review, once confirmed by the Secretary of State following public examination, will form part of the statutory

Development Plan for Wirral and will be a material consideration in future planning decisions including the preparation of the Council's Local Development Framework.

- 13.2 Members will have further opportunity to comment on the Partial Review through statutory consultation on the final Submitted Draft Policies in July 2009.
- 13.3 Provision for Gypsies and Travellers and Travelling Showpeople will need to be included in the Council's Core Strategy Development Plan Document and considered as part of the emerging housing evidence base and the proposed Housing Allocations DPD.
- 13.4 The adoption of the revised Regional Parking Standards would require a review of the Council's Supplementary Planning Document – Parking Standards, last adopted in June 2007.

14 Anti-poverty Implications

- 14.1 There are no anti-poverty implications arising directly out of this report.
- 14.2 The provision of modern facilities for Gypsies and Travellers and Travelling Showpeople may assist in addressing poverty amongst these groups.

15 Human Rights Implications

- 15.1 Provision for Gypsies and Travellers and Travelling Showpeople does have human rights implications.
- 15.2 ODPM Circular 1/2006, paragraph 70, states that "The provisions of the European Convention on Human Rights should be considered as an integral part of local authorities decision making – including its approach to the question of what are material considerations in planning cases. Local planning authorities should consider the consequences of refusing or granting planning permission or taking enforcement action on the rights of the individuals concerned both gypsies and travellers and local residents and whether the action is necessary and proportionate in the circumstances."

16 Social Inclusion Implications

- 16.1 Provision for Gypsies and Travellers and Travelling Showpeople has social inclusion implications in terms of decent homes for all, including access to health, environment, education and social services.

17 Local Member Support Implications

- 17.1 There are no specific Ward Member implications arising directly out of this report.

18 Background Papers

- 18.1 The following background papers are attached as Appendices to this report:

(1) Interim Draft Policy L6 - Accommodation for Gypsies and Travellers

- (2) Interim Draft Policy L7 - Accommodation for Travelling Showpeople
- (3) Interim Draft Policy RT2 - Regional Parking Standards
- 18.2 The existing Regional Spatial Strategy for the North West (September 2008) can be viewed at <http://www.go-nw.gov.uk/gonw/Planning/RegionalPlanning/?a=42496>
- 18.3 Regional Spatial Strategy – Implications for Wirral (Cabinet, 6 November 2007, Minute 257) can be viewed at [http://democracy.wirral.gov.uk/Published/C00000121/M00000351/AI00002030/\\$CA/BCS081106REP1.docA.ps.pdf](http://democracy.wirral.gov.uk/Published/C00000121/M00000351/AI00002030/$CA/BCS081106REP1.docA.ps.pdf)
- 18.4 Regional Spatial Strategy – Partial Review – Options Consultation (Cabinet 26 June 2008, Minute 94 refers) can be viewed at http://www.wirral.gov.uk/minute/public/rsspartialreviewoptionscab26jun08_27609.pdf
- 18.5 Regional Spatial Strategy – Partial Review – Responses to Options Consultation (4NW, July 2008) can be viewed at <http://www.northwestplanpartialreview.org.uk/stakeholders/consultation-results/stage2.html>
- 18.6 Regional Spatial Strategy – Partial Review – Responses to Consultation Forum (4NW January 2009) can be viewed at http://www.northwestplanpartialreview.org.uk/stakeholders/consultation-results/Stage3_Forum_Consultation_Report_Jan09.pdf
- 18.7 National planning policy Circular 1/2006 – Planning for Gypsy and Traveller Caravan Sites (CLG, February 2006) can be viewed at <http://www.communities.gov.uk/publications/planningandbuilding/circulargypsytraveller>
- 18.8 Designing Gypsy and Traveller Sites – Good Practice Guide (CLG, May 2008) can be viewed at <http://www.communities.gov.uk/documents/housing/pdf/designinggypsiesites.pdf>
- 18.9 Merseyside Gypsy and Traveller Accommodation Needs Assessment – Executive Summary (SHUSU, February 2008) can be viewed at http://www.nwrpb.org.uk/downloads/documents/feb_09/nwra_1235461381_Merseyside_GTAA_Executive_Summ.pdf
- 18.10 Merseyside Gypsy and Traveller Accommodation Needs Assessment – Full Report (SHUSU, February 2008) can be viewed at http://www.nwrpb.org.uk/downloads/documents/feb_09/nwra_1235461297_Merseyside_GTAA_Final_Report_.pdf
- 18.11 National planning policy Circular 4/2007 – Planning for Travelling Showpeople (CLG, August 2007) can be viewed at <http://www.communities.gov.uk/publications/planningandbuilding/circulartravellingshowpeople>

- 18.12 Travelling Showpeoples Sites – A Planning Focus Model Standard Package (SGGB, September 2007) can be viewed at <http://www.showmensguild.com/Planning.pdf>
- 18.13 Best Practice Advice of Provision of Showmen’s Permanent Parking Sites (Showmens Guild of Great Britain, June 2008) can be viewed at http://www.northwestplanpartialreview.org.uk/downloads/Best_Practice_Guide_for_Showmens_Sites.pdf
- 18.14 The Accommodation Situation of Showmen in the North West (Showmen’s Guild, Lancashire Section, June 2007) can be viewed at <http://www.theshowmensguild.com/downloads/accommodation.pdf>
- 18.15 The North West’s Travelling Showpeople’s Current Base Location, Preferred Base Locations and Operating Patterns (4NW, November 2008) can be viewed at http://www.nwrpb.org.uk/downloads/documents/nov_08/nwra_1226910642_Travelling_Showpeople_in_the_N.pdf
- 18.16 Supplementary Planning Document 4 – Parking Standards (Wirral Council, June 2007) can be viewed at <http://www.wirral.gov.uk/LGCL/100006/200074/856/SPD4Parking25Jun07.pdf>

RECOMMENDATION

That the Directors Comments and Recommendations 1 to 3 set out in this report form the basis of the Council’s response to the Regional Leaders Forum.

J. Wilkie
Deputy Chief Executive/Director of Corporate Services

This report has been prepared by the Forward Planning Section who can be contacted on 691 8218.