



**Central Lancashire Local Plan 2023 - 2041
Regulation 19 Consultation, February 2025**

Representation 3

On behalf of Michael and Patty Linfoot

Relating to Paragraph 4.101, concerning need for permanent Gypsy and Traveller pitches

1.0 Why the Plan is Unsound

1.1 Mr and Mrs Linfoot question whether the Central Lancashire GTAA provides a robust evidence base to establish accommodation needs to inform the preparation of Local Plans, as required by PPfTS para 7 c).

1.2 We have three concerns:

- the low need from Gypsies and Travellers in bricks and mortar housing;
- the absence of evidence of need for net-migration to the area; and
- the impact of the change in definition of Gypsies and Travellers introduced through Planning Policy for Traveller Sites, December 2024.

2.0 Actions

2.1 All of the factors identified in para 1.2 may lead to an underestimation of need. By the time the Plan is examined there may be the opportunity to take account of any evidence about the impact of the changed definition.

2.2 We would also concur with the conclusion of a recent Local Plan Inspectors' Report, York, February 2025: '*the production of a GTAA is not an exact science*'.

2.3 On that basis, we would invite the Inspector:

- to consider the evidence as to the soundness of the GTAA through a session of the examination; and
- to confirm the target for additional permanent Gypsy and Traveller pitches in Section 1 of Policy HS13 – see the modification to Section 1 of Policy HS13 proposed by Mr and Mrs Linfoot at para 2.4 of their Representation 1, including the words '*at least*' and the reference to '*Or an alternative figure agreed through the examination*'.