



Central Lancashire Local Plan Examination

14 January 2026: Matter 7 Housing Policies

Issue 7 – Does the plan set out positively prepared housing policies, which are justified, effective and consistent with national policy?

Question 7.9 – Relating to provision for Gypsies and Travellers

Hearing Statement

On behalf of Michael and Patty Linfoot

1.0 Introduction

1.1 This statement builds on and should be read with the representations submitted on behalf of Mr and Mrs Linfoot on the Regulation 19 Local Plan.

2.0 a) Does Policy HS13 provide an adequate framework to ensure the need for accommodation for Gypsies and Travellers and Travelling Showpeople can be met as required by national policy? Is the Central Lancashire Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2024 Update robust in its identification of needs for pitches and plots?

2.1 We address the first question at paras 1.1 to 1.8 of our Representation 1 on the Regulation Local Plan. At paras 2.6 and 2.7 we suggest potential modifications to Sections 1. and 2. of Policy HS13. The list of allocations should include the sites at Rosemary Lane, Catforth, and Town lane, Whittle-le-Woods.

2.2 We addressed the robustness of the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2024 Update through our Representation 3.

2.3 We retain our suspicion that the identified need for pitches from Travellers in bricks and mortar is too low (2 households in Preston, Table 6.5).

2.4 We have been personally involved in carrying out a GTAA, https://www.fenland.gov.uk/media/22223/Accommodation-Needs-of-Gypsies-Travellers-Travelling-Showpeople-Boat-Dwellers-and-Bargees/pdf/Fenland_GTANA_Report_-_May_2025.pdf?m=1749650411647 . The Report established, Table 4, page 66, that out of a gross need for 72 pitches in Fenland 2024/25 to 2028/29, 28 of that need, or 39% was from Travellers in housing. An

important finding of the Fenland study was that while the proportion of housed Travellers who are in need of pitch accommodation is significantly lower than for those on sites, because the population in housing is larger, the absolute number in housing needing pitch accommodation is substantial.

- 2.5 We were able to identify so much need from Travellers because we interviewed a large number of people in housing, 175 out of 291 interviews, and because interviews were carried out by members of the travelling community, who were trusted by those being interviewed, Fenland report paras 6.9 – 6.15. In other examples of GTAAs we are familiar with, which identified a significant level of need from housed Travellers (Cambridge Sub-Regional Accommodation Needs Assessment, 2006, Leeds GTANA 2025, work in progress) interviewing was also carried out by Travellers.
- 2.6 Needs assessments tend to ignore or underplay need from housed Travellers because they are ‘hard to reach’¹ but also, because of the widespread but incorrect assumption that all Travellers living in housing will want to stay in housing. Over the years, many families were forced into housing by the lack of alternatives available to them. While some housed Travellers adapt and come to value the facilities that bricks and mortar housing provide, a significant number do not. People’s attachment to living on sites, in the open air, sleeping in caravans, and travelling for at least part of the year, and some people’s intolerance and psychological aversion to bricks and mortar housing should not be underestimated.
- 2.7 Underestimating need from housed Travellers risks the GTAA underestimating needs by a large amount. Table 4.1 indicates that 82% of those who identified as Gypsy and Traveller in the 2021 Census were in bricks and mortar accommodation. If the Fenland figure, of 39% of

¹ One of the reasons for this is that many Travellers in housing keep their identities hidden because of fear of discrimination from neighbours.

the need for pitches coming from housed Travellers is of the right scale, the 2024 Central Lancashire GTAA would underestimate needs by a significant amount.²

2.8 In regard to potential modifications, we accept that there may not be the time within the examination process for the survey work of housed Travellers, which would be needed to define a more robust need target. On that basis we suggest the inclusion of text in the paragraphs after Policy HS13 on the lines:

‘One of the reasons why the target of [49 or an alternative figure] is too low is the likelihood that the 2024 GTAA on which the plan is based failed to identify the likely scale of need from housed Travellers. This issue of need from housed Travellers should be addressed more thoroughly in any future updating of the needs assessment. It means the target in the Plan should be treated as a floor, which should be exceeded, rather than ceiling, which should not be breached.’

2.9 We are not pursuing the suggestion in our Representation that need may be undercounted because of failing to identify net-migration to the area.

2.10 The Regulation 19 Local Plan was published on 24 February 2025, that is before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need. That means, based on para 234, NPPF 2024 that the plan is examined on the basis on the previous version of the NPPF, (and of PPfTS, December 2023). Questions 16 – 22 of the Fieldwork Questionnaire make clear that the GTAA looked carefully at the issue of whether those interviewed had a nomadic habit of life in accordance with the December 2023 definition of Gypsies and Travellers. However, the actual level of need is likely to be higher than that suggested by the GTAA. This is because future planning

² Other things being equal, we would expect need from housed Travellers to be higher in Central Lancashire. This is because, based on the 2021 Census, 28% of people in Fenland were living in caravans, or other temporary or mobile structure, whereas the equivalent figure in Central Lancashire was only 18%.

applications will be determined against the wider definition of Gypsies and Travellers in PPfTS, December 2024, rather than PPfTS, December 2023.

3.0 b) Is Policy HS13 a positively prepared, justified and effective approach to planning for the accommodation needs for Gypsies Travellers and Travelling Showpeople? Does the Council's approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites? Has a robust and objective process been used to identify potential sites across the plan area?

- 3.1 The comments at paras 1.1 – 1.8 of our Representation 1 makes clear that Policy HS13 does not provide an adequate framework to ensure the need for accommodation for Gypsies and Travellers can be met. Nor does the Councils' approach generally conform with the expectations of PPfTS. Central to the Plan's inadequacies are the failure to follow a robust and objective process to identify potential sites across the plan area.
- 3.2 The failure to allocate 1 Heath Paddock is particularly difficult to understand. It was the only site promoted through the call for Sites and for the reasons at Representation 1 para 2.8 and in Representation 4 it is a particularly suitable site for allocation, and early delivery.
- 3.3 To be sound in the senses of being positively prepared – providing a strategy, which as a minimum meets objectively assessed needs -, justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence, effective, and consistent with national policy the plan needs to make allocations, based on the PPfTS para 9 requirements to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the locally set targets, and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, years 11-15.

- 3.4 On the basis that no applications have been approved since the beginning of 2024/25, and of adopting the plan in 2026/27, 5 year need for deliverable sites would equate to the 24/25 to 28/29 requirement of 27 pitches plus 2/5ths of the 29/20 to 33/34 needs, that is 3 pitches, a total of 30 pitches. The requirement for years 6 -10 would equate to 9 pitches. This means 39 pitches is the minimum number required in allocations.
- 3.5 The 'where possible' requirement for years 11-15 is 6 pitches, which means that the number of allocations, which the plan should be aspiring to make is 45 pitches.
- 3.6 Allocations should include appropriate numbers of pitches on:
- 1 and 2 Heath Paddock (3 in addition to the existing 3 with planning permission on 2 Heath Paddock);
 - Rosemary Lane, Catforth;
 - Town Lane, Whittle-le-Woods.
- 3.7 To achieve the needed level of allocations, the Councils should consider (but not be limited to) the following potential sources of land:
- The site referred to at para 6.54 of the GTAA;
 - Land within or facilitated by Strategic Site Allocations, particularly sites SS3, SS5 and SS6 (A+B)³;
 - Vacant or underused publicly owned land.
- 3.8 Where allocated sites are currently in the Green Belt, they should be removed from it, in accordance with PPfTS para 17.
- 4.0 c) Are the requirements of the policy justified, clear and would they be effective?**

³ Experience elsewhere in the country such sites are unlikely to bring forward provision in the early years, and should not be relied on for Years 1-5.

4.1 The policy will not be effective because finding homes will remain up to individual Gypsies and Travellers. Without allocations and appropriately positive policy, people will continue to find it very challenging to acquire sites, given high land prices and the unwillingness of many land-owners to sell to them. They will then have to battle to secure planning permission, often against the opposition of local residents, with the result that getting permission will remain much harder than it should be, and this is exactly why there is an ongoing accommodation crisis among Gypsy people. Mr and Mrs Linfoot's experience, summarised in Representation 1 para 1.7, while perhaps an extreme example, is typical.

5.0 d) Are there any omissions in the policy, and is it sufficiently flexible?

5.1 The GTAA shows a significant level of unauthorised encampments, which suggests a significant need for transit accommodation, which is important to maintaining the Gypsy way of life. Negotiated stopping policies tend to be something Councils indicate they will pursue, and then do not implement. To give confidence that this solution will be pursued, it would be helpful to hear at the examination what progress has been made by the councils in putting in place a negotiated stopping place policy. Alternatively, we can see merit in developing a transit site to cater for the needs of the three districts.

5.2 If the Plan is to be effective, thought needs to be given to how it will be implemented. The GTAA suggests there is need for both private family sites and social rented sites (or similar). While only a certain amount of detail is appropriate for a local plan, to be confident the proposals will meet the needs and be implemented, it would be helpful to be provided with information about:

- which sites will be for private family sites and which for social rented sites;

- for social rented sites (and for a transit site or the costs of negotiated stopping), where will the funding come from;
- Has any thought been given to alternatives to social rented sites?
We are aware of substantial demand from within the Traveller communities for land or part developed pitches, which families could acquire and then complete the development themselves. This kind of approach should be much cheaper to provide than social rented pitches, it will potentially result in capital receipts for investment in further sites, and it gets round the need for ongoing management. It may be particularly appropriate in relation to land within or facilitated by the Strategic Site Allocations