

# Gypsy and Traveller Issues and Options Consultation Document

## 1 Purpose of this Paper

**1.1** All Local Authorities have a duty to provide for the residential needs of gypsies and travellers across their Districts and reflect this within their Development Plan Documents (DPDs). The Council is therefore required to identify future sites for permanent and transit pitches in its Local Development Framework to meet assessed needs. In order to do this the Council must decide the best method or 'approach' on how to identify sites. The purpose of this paper is to set out the issues relating to gypsy and traveller sites affecting the District and to outline a number of different possible 'approach' options, for both permanent and transit pitches, and seek views on these. **Note however that it does not at this stage identify actual sites.**

**1.2** Any sites subsequently identified as a result of any approach in this paper will be put forward as proposed allocations in a future Site Allocations DPD. The Council is in the process of preparing the Site Allocations DPD and intends to consult with the public on draft site allocations towards the end of 2011.

**1.3** For the purposes of this Paper the Council has employed the most recent **planning** definition of "gypsy and traveller" [as set out in Circular 01/06: "*Planning for Gypsy and Traveller Caravan Sites*" February 2006] but subsequently amended:

*"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such. Note the use of lower case 'g' and 't' for gypsies and travellers. In this definition it refers to a wider group than just those who belong to the ethnic groups mentioned in the legal definition."*

**1.4** This definition covers a number of groups – it includes ethnically recognised **Gypsies and Travellers** [capitalised] but also includes others with a nomadic habit - this is why the "generic" lower case terms are used. Note that whilst Planning authorities must assess the housing needs of all those of nomadic habit they **cannot** allocate land for only *certain ethnic groups*.

### What this Paper Contains

- **Section 2** briefly explains the historic background of gypsy and traveller legislation and local authority duties with respect to the provision of gypsy/traveller accommodation.
- **Section 3** examines the characteristics of gypsy/traveller groups in the Staffordshire Moorlands, and highlights issues affecting them.
- **Section 4** briefly explains the current planning policy context for gypsy/traveller accommodation provision in the Staffordshire Moorlands.
- **Section 5 discusses the main alternative 'approaches' for identifying both permanent and transit pitch accommodation across the District.**
- **Section 6** briefly sets out the next stages in the preparation of this document and related documents in the LDF.
- **Section 7** lists a series of questions relating to gypsy/traveller accommodation in the Staffordshire Moorlands (it also invites suggestions for potential future gypsy/traveller sites) - your comments are invited.

Please note that any comments should be returned to the address provided by **4:45PM on Friday 11<sup>th</sup> March 2011.**

## 2 Background

**2.1** Traditionally local authorities had a duty to meet the different housing needs of gypsy and traveller groups (e.g. 1985 Housing Act). Legal duties have, however changed over time (particularly with Government changes) - the 1994 Criminal Justice and Public Order Act, and associated planning circular 1/94 *Gypsy Sites and Planning*, effectively repealed this duty. But subsequently both the **2002 Homelessness Act** and the **2004 Housing Act** introduce new legal duties upon local authorities regarding gypsy/traveller accommodation needs. The most recent relevant guidance is the 2006 planning circular 01/06 *Planning for Gypsy and Traveller Sites* which supersedes the 1994 circular. The main aims of the circular are to increase the supply of authorised (public/private) sites through both the LDF and development control processes “..in appropriate locations..” (responding to a perceived shortage of sites throughout the country and also drawing heavily on sustainability principles).

**2.2** Similarly the 2004 Planning and Compulsory Purchase Act had the effect of overhauling the Development Plan preparation system across England such that Local Planning Authorities address improving ‘inclusiveness’ in their Plans (both RSS and LDFs) so they properly reflect the needs and aspirations of all groups in their Districts. The other emphasis of this legislation is that Plans’ overarching Strategies, and therefore site identifications, are based on the principles of sustainable development.

### New Government Proposals

**2.3** In August 2010 CLG Secretary Eric Pickles announced the new Government’s intention to revoke earlier “planning circulars” relating to gypsies and travellers. This was coupled with the announcement that new legislation was being considered, the thrust of which would be to “equalise” the rights to occupancy/protection from eviction of gypsies/travellers to those of other residents upon *authorised* mobile home sites. On the other hand, ways to strengthen enforcement powers against *unauthorised* traveller sites will also be considered.

**2.4** As part of the new Government’s ‘localism’ approach to planning, through the **Localism Bill**, it is also intended to allow LPAs to decide their own traveller pitch requirements, according to “local need and historic demand”. For this reason, it is considered the findings of the most recent GTAA covering the District **is still relevant as an evidence source**, notwithstanding proposed revocation of RSS. The ‘New Homes Bonus’, which will incentivise housebuilding by individual local planning authorities, shall also apply to authorised traveller sites – this is seen as a way of incentivising the provision of additional authorised sites, therefore helping to meet accommodation shortages.

### Gypsy and Traveller Accommodation Needs Assessment

**2.5** Following the 2004 Housing Act Regional Planning Authorities have been commissioning Gypsy and Traveller Needs Assessments (GTAA’s) in conjunction with their Regional Spatial Strategies (RSS). GTAA’s quantify pitch need per Region

(or sub-Regionally such as across housing market areas), the results of which are then fed into the RSS as a total requirement and then split between constituent Districts. Assessment of 'needs' are based on a number of criteria including caravan count surveys, verbal surveys with the gypsy community to identify future demand, demographic change, existence of current authorised sites (or extant permissions), and unauthorised sites etc.

**2.6** The North Housing Market Area GTAA (December 2007) covers East Staffordshire District, Newcastle Under Lyme Borough, Stafford Borough, Stoke City and Staffordshire Moorlands District and identifies needs across 5-year periods up to 2026 for each District.

For Staffordshire Moorlands (including that part of the Peak Park area lying in the District) a need for **2 residential pitches and 2 transit pitches** is identified up to 2012 with no further additional need identified beyond this.

### 3 Issues

**3.1** This section sets out the main local factors affecting the local gypsy community – this is either evidenced from District-level monitoring/enforcement work conducted by the Council's Housing Section or, where not available, generic regional information which has been gleaned from the most recent GTAA.

#### Existing Sites

**3.2** There is presently only one *authorised* occupied gypsy/traveller site in the Staffordshire Moorlands limited to the occupation of gypsies/travellers - this is a single pitch lying within a residential curtilage in southern Boundary in the greenbelt and SLA. Additionally, there are two other large sites containing "Park Homes" which anecdotal evidence suggest may in the past have contained gypsy/traveller families (**but neither site is limited to the occupation of those falling under the gypsy/traveller definition**). Of these latter two sites, the first is the large 1ha Broadhayes estate located in Hammersley Hayes, NE Cheadle, dating from 1954, which contains around 35 permanent pitches (most occupied). [Note this site was permitted as a Local Authority site but has since passed into private ownership]. The second is the 0.42ha Meadow Style mobile home park abutting Brownlees, western Biddulph, in the greenbelt, which contains around 23 permanent pitches. This has existed since at least 1980. An adjacent 2.83ha field to the North was the subject of an application for a caravan site which was refused in 1980.

#### Unauthorised Patterns

**3.3** There have been at least 15 *unauthorised* occurrences of travellers and/or caravans around the District (including the PeakPark area) since 2005. These typically occur in large paved areas such as private car parks; locations include Leek, Cheadle, Werrington, Biddulph, Winkhill, and rural areas around other villages. A recent application for 3 caravans and associated works on a 0.08ha site in between Lower Tean and Checkley, was refused on appeal in 2009; there is ongoing enforcement action against the occupation of this site.

#### Caravan Counts

**3.4** Caravan counts are bi-annual counts conducted by the Government of how many caravans exist within every District at that point in time. They are used to inform (with other factors) caravan pitch requirements per District, in gypsy/traveller accommodation assessments (GTAA's). Regional evidence suggests an approximately 75% increase in caravan count across the Region between 1994-2006; however during that period across the Moorlands the official count first halved from 2 to 1; but then increased to 4 by January 2007.

## Reasons for Stopping in the Moorlands

**3.5** A major reason for gypsies/travellers choosing the stopping locations they do is proximity to existing family. This is by far the most common reason given for site occupation regionally (71% of those surveyed gave this as their main reason) – more than three times that of “work”. Across the Region according to the GTAA, overall 62% of gypsy/traveller households identified as “local” to the area they resided in [but this figure varies according to site type].

**3.6** Other common reasons for stopping within the Moorlands (and more generally) include proximity to work (eg seasonal agricultural work), passing through to attend Fairs (Appleby agricultural Fair etc); even medical reasons (proximity to hospitals etc). When questioned about accessing local services in the GTAA, the service North Staffordshire travellers rated most important tends to be GP/Health centre, followed by A&E hospital, then local shops.

**3.7** Anecdotally, it is believed the average length of unauthorised stay in the Moorlands is only 1-3 days. In the Moorlands, summer travel is most prevalent. However, the GTAA suggests that upon authorised sites, length of stay is more permanent, with over half of those North Staffordshire travellers surveyed having been on that site for 5+ years. Although established educational/work ties was cited as a reason here, it is clear that a perceived lack of authorised sites (and also unauthorised roadside stops) to travel to, ‘locks in’ such travellers to sites they currently occupy.

## Household Characteristics

**3.8** According to the GTAA, average traveller household size across North Staffordshire is 2.9 - higher than the national average. Whilst household size varies as it would across the non-traveller community, most households are two-person (33%). However, notably, the average on *unauthorised sites* is much higher (3.4-3.6). Young families predominate- the 25-39 age band is most prevalent (about 34%); followed by the 40-49 band, and the 16-24 band. There is a high incidence of married households.

**3.9** The number of caravans (and pulling vehicles) varies across unauthorised encampments in the Moorlands – between 1-6 caravans is typical (with between 1-2 caravans per household).

**3.10** In terms of education, the GTAA suggests that there is a high incidence of traveller children missing regular education (with only 21% of households across North Staffordshire confirming their children attend school regularly). Anecdotally, District questionnaires pick up on a lack of educational arrangements for travellers’ children within unauthorised sites. On authorised encampments, the picture is less clear. The GTAA iterates that health problems affect the traveller community more than wider society, estimating that around half of all travellers have some form of

health problem. Survey results point to 'mobility problems' as the most prevalent problem. As a general rule, unauthorised sites have poorer access to facilities (WC, running water, waste collection etc).

**3.11** In terms of ethnicity, regionally "English Romany" makes up nearly two thirds of households, followed by "Irish Traveller" at 23%. However, anecdotally, across the Moorlands Irish travellers are most predominant.

### **Demand for Sites in Staffordshire Moorlands**

**3.12** In line with Government methodology, the GTAA calculates individual District requirements based on "need where it arises". As this is largely based on existing presence of gypsies across Districts (ie resultant unauthorised encampment surveys; predicted household formations of those questioned within Districts etc) future need is a factor of existing presence. Because the Moorlands has a lower prevalence of gypsies than other GTAA Districts, demand for future pitches is lower, comparatively.

### **Site Preferences**

**3.13** The GTAA suggests that most travellers would prefer to live on a private site owned by them/their family; Local Authority sites were second most preferred, and 'transit sites' in third place. In particular, sites owned by other travellers, and "bricks and mortar" housing, were not popular options. The preferred site size would be between 5-15 pitches. It was questioned whether combining permanent and transit pitches on a single site would be desirable – this produced ambivalent views.

### **Locational Characteristics of the Staffordshire Moorlands**

**3.14** Staffordshire Moorlands is in north east Staffordshire, bordered by Cheshire to the north-west, Derbyshire to the east and Stoke-on-Trent to the south-west; covering an area of 57,624 hectares (222 square miles), and has a population of 95,400 (2009 estimate). Around 53% of the population is based in the three towns of Leek, Biddulph and Cheadle; around 22% of the remainder live in the four largest villages, all located in the west of the district. The District's population has steadily fluctuated since 1991, and is predicted to rise by about 5% between 2006 and 2026 [2008-based population projections (ONS)]. In terms of proximity to services and facilities, a recent study graded the major settlements as green (good) through to amber to red (bad). Most settlements had green to amber ratings, the two with red ratings were in the rural east.

**3.15** A third of the District lies inside the Peak Park. Of the remainder of the Moorlands outside settlement boundaries, around 30 per cent is designated as Green Belt (around the western Stoke on Trent 'fringe'); and well over 90% has a 'special landscape' designation. The landscape and historic environment of the District is highly valued and contains a large and particularly rich stock of protected assets, reflected in the number of formal designations. There are extensive protected

environments (SSSIs, Special Conservation Areas) distributed across the District and particularly within the PeakDistrictNational Park boundary. The District (outside the Peak District) also has 14 Conservation Areas.

**3.16** A number of 'A' Roads traverse the District linking to the Potteries, Macclesfield, the Northwest, the PeakPark, Uttoxeter etc. However, there is only one strategic highway which is the (dual carriageway) section of the A50 linking Uttoxeter with Blythe Bridge and Stoke on Trent at the southern extreme of the District.

### **Council-owned Land**

**3.17** Gypsy and Traveller sites can be owned or rented from both the public- or private-sector. Government guidance recognises that often private land for new sites, is not attainable to gypsy communities on grounds of prohibitive costs; therefore Councils under their duty to provide for gypsies' accommodation needs should also consider whether land they own could contribute.

**3.18** The Council holds records on land that it owns which will need to be considered alongside other planning considerations in identifying sites. This is largely distributed in/around the three towns (eg public parks, nature reserves and industrial estates), although some exists elsewhere. Similarly the County Council also own land across the District – the District Council will in future endeavour to investigate these holdings.

## 4 Policy Context

**4.1** This section sets out the current planning policies covering gypsies and travellers within the Moorlands. Currently, the **West Midlands RSS** (Policy CF9) requires all Development Plans to ensure “adequate provision” of gypsy/traveller sites; reflecting demand in the area, as indicated by the trends shown by the Government’s bi-annual caravan counts on the one hand; and other “local information”, which was taken to mean the 2007 GTAA figures.

**4.2** In January 2010 the West Midlands Regional Assembly issued an **interim draft Policy Statement** (“*Provision of New Accommodation for Gypsies, Travellers and Travelling Showpeople*”) to accompany the then draft RSS, for the purpose of enabling local authorities to increase their existing rates of delivery on new pitches, if required, prior to new RSS on the subject. This proposes the same pitch requirement for the Staffordshire Moorlands as did the GTAA except that the requirement runs from 2007-2017 (not 2012). A review of pitch requirements is also proposed by 2015. In the absence of this, indicative figures of 1x additional permanent and 1x additional transit pitch are suggested after 2017.

**4.3** The Council’s emerging Core Strategy contains a policy setting out how both future pitch site allocations, and future planning applications for these, will be determined. This policy reflects recent National and Regional planning policy (and circular 01/06) in as much as gypsy sites should be treated having regard to the same sustainability factors as other types of land use i.e. proximity to settlements and/or facilities/services so as to reduce the need to travel, especially by car; preference for re-use of brownfield sites over greenfield sites; visual impact considerations, etc.

## 5 Options for Identifying Sites

**5.1** Circular 01/06 states the importance of sustainability criteria when identifying future gypsy/traveller sites. These include reducing the need to travel/ alternatives to car use; access to/capacity of services (particularly health and education); access to roads; avoidance of flood risk; greenbelt considerations; appropriateness of development scale etc. It stresses that whilst sites on the edge/near settlements may satisfy sustainability principles, there is no reason why rural sites cannot also be acceptable.

**5.2** This section therefore considers a range of possible options for identifying sites to be allocated in the Site Allocations DPD. The Council will approach the needs for permanent residential pitches, and transit pitches separately. More detailed design guidance with respect to the differing needs of both is contained in *Designing Gypsy and Traveller Sites: Good Practice Guide* (DCLG May 2008).

### Permanent Pitches

#### Option 1 – Zones of Search Around Settlements

**5.3** Given their permanent nature, addressing the principles of sustainable development is as important as when identifying other types of land use allocation. Equally important is ensuring these sites contain sufficient amenities for day to day use, which may need to be provided later. Having considered the above guidance and recent approaches of other Districts, one option is to identify “**zones of search**” around existing settlements for suitable sites. As *accessibility to facilities/services* is important, this will dovetail with the approach of the Core Strategy’s Spatial Strategy identifying areas for future growth based on, amongst other factors, accessibility to facilities/services. In general the towns and “larger villages” within the Core Strategy are those with the best facilities/services, particularly where health and education are concerned (also most “larger villages” are closer to higher order settlements such as Stoke, where a wider range of facilities/services are available); although sites around “smaller” settlements may also be appropriate, depending on the site size required, access to strategic highways etc.

**5.4** In theory, there is no ‘outer limit’ to a ‘Zone of Search’, although it must be recognised that the more remote a location from a settlement and its facilities, the less likely it can be considered “sustainable” in transport terms. For example, typical “walkable distances” (especially from the point of view of children) would be critical in this respect. It is suggested that any site should be no more than 2 miles walking distance from a primary school (this being the statutory walking distance for primary aged children).

**5.5** It is recognised that as future permanent pitch requirements are likely to increase (organically) over the longer term, the ability of such a site to be sensitively extended is a consideration. It may or may not be desirable to accommodate all District pitch

requirements upon a single site. Also the potential of combining both permanent and transit pitches on individual sites will be considered, as future GTAA evidence may dictate.

**5.6 Advantages of Option 1** - The obvious advantage of this approach is that locations would be determined against the principles of sustainability, and thus in accord with recent national guidance, in the same way as other land uses. In particular, proximity to health and education facilities (based on recent evidence of existence of these facilities used to inform the 'Preferred Options' of the Core Strategy) is an important consideration. A further advantage is that since the approach is not based on divorcing or isolating gypsies from the wider community, (in line with Government guidance) it promotes social inclusion. Arguably, this approach best reflects the emerging Core Strategy Policy H3, Circular 01/06, etc. See para 5.1 above.

**5.7 Disadvantages of Option 1** - The presence of health and/or education facilities does not necessarily imply capacity of these; for example, existing schools may already be full, whereas permanent residential developments would have to make educational contributions (in certain circumstances) to expand these, this would be unlikely to apply to gypsy/traveller sites. Also, notwithstanding the benefits of social inclusion argued above, proposed sites abutting/adjacent to existing settlements, may raise amenity issues (as with other types of housing).

### **Option 2 – Remote Locations**

**5.8** This would encompass selecting a site primarily because it has no immediate neighbours ie. in a countryside setting. Site selection would also be informed by proximity to transport links, and the unauthorised encampment records already explained in this note. Necessarily there would be trade offs between desire for a remote location, against the proximity to beneficial facilities (eg health/education/shops). As per option 1, such sites could be designed so as to be expanded incrementally, to accommodate future (permanent and/or transit) pitch requirements, should the need arise.

**5.9 Advantages of Option 2** - Since the site would be remote there would be less potential for neighbour amenity issues arising. Also, for the same reason, this may free up options for authorising "mixed" residential with business use gypsy sites, should evidence dictate need for such an arrangement. Further, local anecdotal evidence might 'pinpoint' common routes or authorised/unauthorised stop points used by travellers in the District, such that a 'midpoint' in the countryside be selected.

**5.10 Disadvantages of Option 2** - Given most of the District outside settlements is 'Special Landscape Area' and about 45% of this is North Staffordshire greenbelt (and those areas of the District not covered by SLA in fact fall within greenbelt), the main drawback is the impact upon the natural environment. Greenbelt policy is particularly restrictive to new-build developments in the greenbelt (which includes gypsy sites), specifying that very special circumstances are required to justify development, which includes upon 'brownfield' sites. However it should be stressed

that an SLA designation does not in itself preclude development – rather, a balance of all material considerations must be reached (including addressing that of “accommodation need”). The other major disadvantage is that these sites would largely not satisfy “sustainability” criteria with regards to proximity to facilities/services, reducing the need to travel etc, when compared to other Options (and presumably sites would score poorly against SA criteria); and for the same reason would not promote social inclusion.

### Option 3 – Expanding Existing Sites

**5.11** An alternative approach would be to channel future pitch requirements such that existing authorised sites are expanded. There is only one authorised caravan site for the occupation of gypsies in the District [Dilthorne] (although there are two other generic “park home” sites at Tower Hill, Biddulph, and Hammersley Hayes, Cheadle).

**5.12 Advantages of Option 3** - This approach would provide surety for residents because all future requirements would be met around existing sites. As two of the sites abut District towns, there would be reasonable access to facilities/services/bus routes etc in those cases – similarities therefore exist with Option 1 here. Also, the expansion of existing sites above a critical point may allow for the provision of on-site facilities [eg recycling points, warden accommodation], which may be otherwise lacking in two smaller sites.

**5.13 Disadvantages of Option 3** - Of the three sites, only one lies within a development boundary (the other two are in the countryside). The expansion of all three would involve countryside encroachment. The first [Dilthorne] is surrounded by woodland, in the greenbelt and SLA, in a remote location away from facilities/services. The second [Biddulph] lies in the greenbelt and is very close to the conurbation – therefore expansion would raise not only greenbelt loss concerns, but may be deemed to interfere with the separate gypsy/traveller site provision suggested by the GTAA with reference to the Stoke conurbation. The third [Cheadle] could only be expanded into SLA. In the case of the generic park home sites, proposed expansion may also raise amenity concerns. It may also be the case that family groupings/ethnicities of existing/new gypsies/travellers may vary, which could conceivably create tensions. A further disadvantage is the fact that all three sites are privately, not publically, owned, therefore the decision as to whom to allow to occupy future pitches may not meet GTAA need; additionally future expansion would require landowner agreement/compulsory purchase.

### Transit Pitches

**5.14** These accommodate transient needs, therefore proximity to highway corridors and vehicular accessibility considerations are the most critical issues. *Designing Gypsy and Traveller Sites: Good Practice Guide* explains that these sites may have higher vehicular parking requirements than permanent sites, and are more likely to contain hard over soft landscaping solutions. But in other respects the differences are insignificant.

## **Option 1 – Highway Corridors**

**5.15** As stated above areas of search would be around key highway points or intersections, access stubs etc. This would be informed by local evidence about traditional gypsy travel patterns across the District (ie proximity to work, family) along with detailed Highways Authority discussions. In the case of two or more equally valid 'options' arising, that with the best sustainability rating would be selected. Anecdotally, it is believed that the most prevalent corridors in this respect are the A50 crossing the District; and the A521 Stoke-Cheadle Road.

**5.16 Advantages of Option 1** - Sites would be conveniently located for travellers, reflecting work/lifestyle patterns. As these often occur away from settlements arguably there would be fewer amenity issues.

**5.17 Disadvantages of Option 1** - Highway corridors may not be well related to services/facilities, therefore performing poorly in sustainability terms. In the case of rural locations, there would be some visual impacts. Divorcing sites from existing residential areas may be viewed as missing an opportunity at 'integrating' traveller communities from the settled community. |

## **Option 2 – Combined Residential/Transit Pitches**

**5.18** The possibility of merging permanent with transit pitches on a single site was mentioned in para 5.8 above. In this respect, this 'option' would represent a 'hybrid' with one of the other, permanent pitch options (depending on which permanent 'option' applied). A combined site would have to accommodate all the facilities which would be required within both (see paras 5.2/5.14 above) – however, in practice there may be little difference.

**5.19 Advantages of Option 2** - The main advantage to this would be the Council could accommodate all its requirements within a single site. A second advantage could be that a permanent site may happen to lie near highway corridors (although this would equally be a disadvantage if this were not the case).

**5.20 Disadvantages of Option 2** - Disadvantages would include general disturbance upon the amenity of permanent occupiers, by the more frequent movements of transit occupants. Monitoring may also be required if the period of occupation of transit pitches was being abused, as per permanent accommodation. It may also be the case that family groupings/ethnicities of permanent v. transit gypsies/travellers may vary, which could conceivably create tensions (although this may equally apply on other sites, eg when existing sites are expanded).

## 6 Next Stages

**6.1** All responses to this consultation will inform future site allocations work in identifying specific sites, as part of the Site Allocations Development Plan document.

However, given that this may be a lengthy process due to the requirements for extensive consultation and examination for a statutory document, the Council will consider preparing an **Interim Policy Statement** on gypsy and traveller provision in advance of this.

**6.2** The purpose of an Interim Policy Statement will be to set out the Council's agreed policy on the provision of gypsy and traveller sites and identify suitable site(s). It would not surmount the need to formally adopt policies and allocate sites through a statutory Development Plan Document and could not carry the same weight in planning decisions and appeals as an adopted document. However, it would provide a strong steer for determining planning applications and guiding applicants to suitable site(s) in the intervening period whilst the Core Strategy and Site Allocations DPD are being finalised.

## 7 Questions

1. Which of the Options is the best? Or should a combination of Options be employed?
2. Are the Option 1 Zones of Search criteria sufficient? Can you think of any other relevant search criteria?
3. Can you suggest any specific sites in the District?
4. Should Council-owned land be a priority?
5. Is the combining of both permanent with transit pitches on a single site desirable?
6. Should the Council seek to identify a single site containing all required pitches, or a number of sites? How important are family groupings in this respect?
7. Are there any other 'approach' options for transit sites?
8. How important is highway access in the Moorlands for gypsy/traveller groups? Which road networks are most important?
9. Do you hold any knowledge/experience regarding the origins of travellers moving into the Moorlands, the nature of their itinerancy, onward destinations etc?
10. How important is proximity to either school sites, or private teaching tuition facilities, for transit sites? Is this any less important than for permanent sites?
11. In what circumstances should new sites require a site manager's accommodation? Is this dependent on site size, and is this the same for permanent versus transit pitches?
12. Should the Council specify a maximum stopping time in relation to future transit sites?

## HOW TO MAKE COMMENTS

Responses to the questions can be either posted or emailed . Postal responses should be sent to the following address (no stamp required):

FREEPOST RRLJ-XCTC-JBZK  
Head of Regeneration Services,  
Staffordshire Moorlands District Council,  
Moorlands House,  
Stockwell Street,  
Leek,  
ST13 6HQ.

Emailed responses should be sent to: [forward.plans@staffsmoorlands.gov.uk](mailto:forward.plans@staffsmoorlands.gov.uk)

**RESPONSES MUST BE RECEIVED NO LATER THAN 4:45PM ON FRIDAY 11<sup>th</sup> MARCH 2011**