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Dated: 13 November 2015

**Re: Carlisle District Local Plan Examination: Matters & Issues for Examination**

Dear Tony Blackburn

Thank you very much for providing this opportunity to AWAZ Cumbria to bring to your attention some of the matters and issues as part of your examination of the Carlisle District Local Plan. We have consulted with the local members of the local Gypsy and Travellers community and this submission includes their responses to your questions. Furthermore, we have facilitated a meeting of the local Gypsy and Travellers Community with the Council on 8<sup>th</sup> August 2015 where members of the community raised their serious concerns Re: Carlisle District Local Plan: Gypsy & Travellers Provision.

Matter 4 – Gypsy & Traveller Site Provision

Issue 1: Whether the LP makes satisfactory provision to meet the needs of the gypsy and traveller community and travelling showpersons?

Q1. Does the GTAA provide a realistic assessment of the needs of the gypsy and traveller community? In particular:

- (a) Is the allowance made for an annual 10% turnover on existing sites realistic and supported by evidence?
- (b) Has in-migration to the area been assessed and included in the assessment of need?

Answer (a)

No the GTAA does not provide a realistic assessment of the needs of the gypsy community the 10% turnover is completely wrong if it was right why is there waiting list on every camp for pitches with people waiting years for pitches being made to live on the transit part of site, it also makes no allowance for young gypsy/travellers getting married and moving in to their own caravan 90% of gypsy are married before they are 20yrs old. Furthermore, it does not make any allowance for the Gypsy's who are currently living in (Brick and mortar) houses because of the shortfall of sites in their area and for the ones that's moved into houses because of medical reasons their children now adults wanting to move back on sites.

Answer (b) AWAZ Cumbria has concerns that the in-migration to the area has not been assessed adequately. The number of unauthorised encampments has been consistently on rise and the

Council has not been open and honest in recognising this fact and accurately reflecting the number of unauthorised encampments and the number of people from those encampments needing transit or permanent site provision in the Carlisle District. We would ask the examiner to look the data of the unauthorised encampments in Carlisle in the last three years to assess the true level of need and ascertain whether the Council proposed LP honestly reflect the needs of the G&T community.

Q2. The GTAA identifies a need for 15 pitches up to 2028 not 2030 as it has a base date position of 2013/14. In response to the Inspector's Initial Questions the Council confirms that the reference at paragraph 5.90 of the Local Plan to '2028' is a typographical error and should read 2030. However it would also be necessary to calculate the additional need for those two years. The Council has recently granted permission for an additional two pitches on an alternative site within the District. It suggests that this results in the residual unmet need between now and 2030 reducing to seven pitches. However, that would not take account of the additional two years of the plan period not already accounted for in the GTAA.

- (a) Based on the methodology used in the GTAA, would the identified need between 2013 and the end of the Plan Period be 17 pitches? If so, even having regard to the two pitches that have since been granted planning permission, the identified need would remain 15 pitches over the plan period?
- (b) Unless 6 pitches have been granted elsewhere, the allocation of 9 pitches at Low Harker Dene would not meet the identified need over the entire plan period; they would meet a need for the first 9 years of the plan with windfall sites being relied upon to meet the remainder. Is this correct?

#### Answer Q.2

First of all, AWAZ Cumbria has serious concerns with regards to the quality and accuracy of the GTAA report and the methodology implied there in to establish the need. We have raised this issue through Cumbria Multiagency G&T Protocol Group at the time of this report being prepared. Despite the assurances that the authors of the report will answers the questions before finalising the report no such opportunity was offered to clarify serious concerns with regards to the accuracy of the data and survey carried out in Carlisle to establish the need. Many of the members of the community and professional view that "this GTAA assessment report is not the worth of the paper it is written on".

We strongly challenge the need assessment of the number of the pitches.

Q3. Low Harker Dene is an existing Council owned gypsy site. The addition of 9 pitches will result in a large single site accommodating 24 pitches. The single allocation offers little choice to the gypsy and travelling community. The Sustainability Appraisal Report (SD003) confirms that no other sites were put forward for consideration.

- (a) What efforts were made to ensure that the gypsy and travelling community were able to engage in the site selection process?

Answer:

We are submitting a direct quote from one of the member of the local Travellers community

“I am unaware of any local gypsy being ask to comment on the location of the 9 pitches, I would not like to had that a large concentration of Gypsy’s in one area would be terrible for all concerned for the Gypsy’s and the settled community, Gypsy’s don’t want to live on a reservation like red Indians they want to have the same rights as everyone else the right to choose what area they live in what schools they can send their kids to, the right to buy or rent.”

- (b) Is the site currently occupied by both Romany Gypsies and Irish Travellers and will the additional 9 pitches provide accommodation that is realistically suitable for both ethnic groups?

AWAZ Cumbria has concerns that the Council lacks the understanding of the inter and intra community dynamics and the record of Council engagement with the BME communities over the last 3 years is very minimal and superficial. We would welcome an opportunity to help the Council to alleviate the situation and to bring asset based community development approach to meet the needs of all sections of the community.

Q4. Are the criteria set out in Policy HO11 consistent with national policy which requires criteria based policies to be fair and facilitate the traditional and nomadic life of travellers whilst respecting the interests of the settled community (Planning Policy for Traveller Sites (PPTS) paragraph 10) and realistically likely to facilitate additional accommodation to meet the needs of the gypsy and traveller community?

AWAZ Cumbria has concerns that the Council written statements does not adequately reflect its actions and practices on the ground. There is a great deal on inconsistency in this regard and we would welcome if the Carlisle District LP examiner address this issue objectively.

Q5. Policy C3 of the PPTS refers to sites in rural areas and the countryside. Is there tension between this policy and criteria 1 of Policy HO11 that requires sites to be physically connected to an existing settlement?

We believe that G&T community members should be provided equity in provision of sites in all areas and any unfair disadvantage should be removed.

Q6. Is requirement (8) of Policy HO11 that requires proposals to include site management measures in proposals for all sites, including small family sites or single pitches, justified?

Q7. What criteria in Policy HO11 would distinguish between circumstances when a pitch may only be suitable for a temporary period rather than providing permanent accommodation? Is such a distinction justified?

Q5. The Council makes no allocations for transit pitches within the LP. What justification is there for relying on this provision to come forward through windfall development, for example can the



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Council provide evidence of the past delivery of such transit windfall developments to demonstrate that future provision is realistic?

We would welcome an opportunity to facilitate a meeting with the local Gypsy and Travellers community and the Council to provide the explanation on their existing policy and practice. A number of local G&T community member have concerns that the Council does not engage with them and explain their approach and decision.

We hope this submission would help the programme officer to have a better understanding of some of the key issues.

If you need any further information or assistance please do not hesitate to contact me.

Yours Sincerely,

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