

# **Supplementary Report To Chorley Council**

### by Susan Heywood BSc (Hons) MCD MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 8 May 2015

#### PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) SECTION 20

#### SUPPLEMENTARY REPORT ON THE EXAMINATION INTO THE CHORLEY LOCAL PLAN 2012 – 2026

#### GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE POLICY AND SITE ALLOCATION

Examination hearing held on 23 September 2014

File Ref: PINS/D2320/429/7

# **Abbreviations Used in this Report**

GTAA GTTS LP LCC LDS LP MM PDTS	Gypsy and Traveller Accommodation Assessment Gypsy and Traveller and Travelling Showpeople Local Plan Lancashire County Council Local Development Scheme Local Plan Main Modification
PPTS	Planning policy for traveller sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement

### Non-Technical Summary

This supplementary report concludes that this part of the Chorley Local Plan, dealing with gypsy and traveller policy and site provision, is sound providing a number of modifications are made. Chorley Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the main modifications to address this were proposed by the Council and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Insertion of paragraphs explaining the need for gypsy and traveller pitches in accordance with the updated GTAA and the requirement to carry out further work on the GTAA;
- Inclusion of a policy making provision for a minimum of 5 permanent gypsy and traveller pitches within the mixed use allocation HS1.5/EP1.6 Cowling Farm;
- Addition to the Key Indicators and Targets table to ensure progress on a separate Gypsy and Traveller and Travelling Showpeople Accommodation Local Plan, in accordance with the timescale in the updated LDS; and
- Providing for the updating of the Policies Map to include allocation of site HS11 within the mixed use allocation HS1.5/EP1.6 Cowling Farm, Chorley for a minimum of 5 permanent gypsy and traveller pitches.

# Introduction

- 1. The Chorley Local Plan was submitted for examination in December 2012. During the examination, by Inspector Shelagh Bussey, it became apparent that the absence of any allocation of sites for the accommodation needs of gypsies and travellers was based on an outdated needs assessment. The examination was suspended in order to allow time for an updated needs assessment to be carried out. A partial report was issued, in October 2013 [CH17.1], which dealt with all soundness matters except for the provision of accommodation for gypsies and travellers. The partial report indicated that this matter would be addressed in a supplementary report.
- 2. The Council, in conjunction with the adjoining authorities of South Ribble and Preston, therefore undertook work towards updating the Gypsy and Traveller Accommodation Assessment (GTAA). The updated GTAA was published in January 2014 [CH11.1].
- 3. This report comprises the supplementary report and contains my assessment of that part of the Plan which deals with gypsies and travellers in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). The report considers first whether this part of the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether this part of the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework), paragraph 182, makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
- 4. The starting point for this part of the examination is the assumption that the local authority has submitted a policy and site allocation for gypsies and travellers which it considers to meet the criteria for soundness in the Framework.
- 5. My report deals with the main modifications that are needed to make the Plan sound and legally compliant in so far as it relates to provision for gypsy and traveller accommodation needs. These modifications are identified in bold in the report (**MM**). In accordance with Section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make this part of the Plan unsound/not legally compliant. These main modifications are set out in the Appendix. The main modifications that are necessary for soundness relate to matters that were discussed at the examination hearing on 23 September 2014.

# Consultation

6. Following the suspension of the examination the Council assessed a number of sites with potential for allocation for a minimum of 5 pitches and carried out Sustainability Appraisal (SA) of those sites. A number of site options were considered and the Council consulted on a Preferred Options document [CH12.1] for a six week period in June and July 2014. That document indicated that the Council's preferred site was Cowling Farm. In addition to the consultation, the Council met with representative bodies, Councillors and

the existing resident gypsy community. Numerous representations were received as a result of that consultation. The results of the consultation were taken on board by the Council in their subsequent Proposed Allocation document [CH12.9]. That document confirmed the allocation of Cowling Farm for a minimum of 5 pitches as part of a mixed use allocation of the site.

- 7. As the Preferred Options document followed on from the requirements set out by Inspector Bussey at the earlier stage of the examination process, the Council were already aware that modifications would be required to the wording of the gypsy and traveller elements of the Plan in order to make it sound. Accordingly, at the same time as the consultation on the Preferred Options document, the Council consulted upon the proposed modifications, which are expanded upon below, namely MMEC66, MMEC67, MMEC68 and MMMEC18. However, the chosen site was not identified in the wording of proposed modifications MMEC66, MMEC67 or MMMEC18. Consequently, following the examination hearing on 23 September 2014, the Council again consulted upon the proposed modifications (MMEC66A, MMEC67A and MMMEC18A) this time specifically identifying Cowling Farm as the allocated site for gypsy and traveller pitches. This consultation was undertaken for a further period of six weeks.
- 8. Following concerns that this second consultation did not allow responses to be made on the Proposed Allocation document, a third consultation was undertaken for a further eight week period. At this stage it was made clear that comments could be made on the Proposed Allocation document and relevant background documents which had led to the Council's preferred choice of site. A further modification MMEC88 was also consulted upon at that stage. Additional evidence from the Council produced following the hearing [CH18.6] was also made available for comment by those who attended the hearing. This document was also made available on the Council's website. I have had regard to the results of all of these consultations in coming to my conclusions.
- 9. There is a perception that there has been inadequate engagement with the settled population. However, the Council's approach has been reasonable in the circumstances in order to rectify an issue which would otherwise have rendered the entire Plan unsound. Criticism has been made that the documents were not translated into other languages. However, there is no evidence that anyone has been prejudiced by this. The Council's policy is to translate on request and no such request was received [CH19.12]. Given the number of responses to the proposed allocation and the involvement of Council Members in the consultation, if this had been an issue likely to have disadvantaged some sections of the population, it is likely that this would have been drawn to the Council's attention.
- 10. Overall, I am satisfied that the Council has given adequate opportunity for local people to become involved in the process and to express their views in accordance with its Statement of Community Involvement (SCI) [CHSD006 and its update CH19.13, CH12.13, CH15.1]. I conclude that consultation has been compliant with the SCI and has met the minimum requirements of the Town and Country Planning (Local Plans) (England) Regulations 2012.

### Assessment of Duty to Co-operate

- 11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. In this supplementary report, I make this assessment in relation to the gypsy and traveller matters only.
- 12. The Council are engaging, actively and on an ongoing basis, to produce an updated GTAA. They have joint working arrangements in place with Preston and South Ribble Councils to facilitate this and a draft GTAA has been produced. The Council have prepared a Duty to Co-operate Supplement [CH12.12] which indicates that the Council have engaged with other nearby local authorities on the issue of gypsy and traveller needs assessment and site provision. Some nearby local authorities initially raised concerns regarding the regional distribution of pitches and the lack of gypsy and traveller site provision in Chorley in the Plan as originally submitted. However, those local authorities have subsequently indicated that they intend to meet the need for sites arising within their own local authority boundaries. Plans for these and other nearby authorities are at various stages of the plan preparation process. The Council are proposing to undertake further work on the draft GTAA, jointly with Preston and South Ribble, in order to assess whether there is an additional level of need for pitches in Chorley. Their updated LDS [CH19.14] sets out a timetable for the production of a separate gypsy and traveller plan. The Duty to Co-operate Supplement sets out the processes which are in place to ensure regular and ongoing engagement on this matter with surrounding authorities.
- 13. I conclude that the Duty to Co-operate in respect of the gypsy and traveller policy and site allocation has been met.

### **Assessment of Soundness**

### Overview

- 14. The Framework requires authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. Planning Policy for Traveller Sites (PPTS) also requires local planning authorities to use a robust, up-to-date evidence base to establish accommodation needs for gypsies and travellers.
- 15. The 2014 GTAA found that there was a need for 5 permanent gypsy and traveller pitches in Chorley during the lifetime of the Local Plan. Nevertheless, there remain a number of issues of concern with the updated GTAA and further work is required in order to ensure that it provides a robust assessment of need. The Council have committed to carrying out the necessary further work. However, in an attempt to avoid significant delay to the adoption of the Plan, and to ensure its soundness, the Council have suggested a modification (**MMEC66A**) to incorporate this commitment into the Plan and to produce a separate Gypsy and Traveller and Travelling Showpeople Accommodation Local Plan (GTTS LP) within a specified timeframe. A further modification (**MMEC67A**) introduces a policy (HS11) allocating a site in the current Plan [Chorley Local Plan 2012-2026] to meet the identified need for a minimum of 5 permanent pitches as part of a mixed use allocation HS1.5/EP1.6, at Cowling Farm, Chorley. This site was originally

allocated for housing and employment purposes in the Plan and that allocation was found sound in the partial report in October 2013 (paragraph 67). Proposed modification (**MMMEC18A**) provides for the updating of the Policies Map to include the allocation of the site for a minimum of 5 permanent gypsy and traveller pitches within the mixed use allocation HS1.5/EP1.6 Cowling Farm.

16. The Council are now seeking to meet the level of need identified in the most up-to-date assessment. This will ensure that the Plan is positively prepared, justified and compliant with the Framework and PPTS. The further work to be carried out towards producing a separate GTTS LP will also ensure that any further need for gypsy and traveller accommodation, and any identified need for transit and travelling showpeople sites, is robustly assessed. This will also ensure that provision of any further sites is addressed through the preparation of a specific and separate plan. The LDS [CH19.4] has been updated to include a reasonable timeframe for undertaking the further work on the GTAA and preparing the GTTS LP. A further modification (**MMEC68**) is proposed to the monitoring framework of the Local Plan to ensure that the timeframe in the LDS is adhered to. The suggested modifications, as amended, are necessary to ensure that the Plan is sound.

### Main issue

# *Is the allocated gypsy and traveller site at Cowling Farm justified, deliverable within the plan period and consistent with national policy?*

- 17. All of the potential gypsy and traveller sites, identified in the Preferred Options document [CH12.1], have been subject to SA. The SA criteria were in line with those used for the allocation of all of the other sites in the Plan [CH18.6]. There has been criticism that the process of site selection has not been transparent and that the SA process has been flawed as a result. The Council prepared a SA Supplement [CH12.2] at the Preferred Options stage. This identified the potential sites and gave them a band rating. This document referred to other factors taken into consideration in assessing the suitability of sites as set out in the Preferred Options document. A further SA Supplement [CH12.10] was prepared at Proposed Allocation stage which again indicated that further factors affecting the choice of site were set out in the Proposed Allocation document [CH12.9].
- 18. The Government's Planning Practice Guidance states that the SA should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. Taken together, the aforementioned documents satisfy the requirements set out in the Planning Practice Guidance.
- 19. Concern was raised that the SA criteria should have been weighted towards those aspects which were more important for the allocation of gypsy and traveller pitches, as identified in the updated GTAA. The Council have had regard to this information, as evidenced in documents CH12.1 and CH12.9. However, the GTAA questionnaire did not ask the gypsy and traveller community what factors were important to them; it simply asked them to rank a number of pre-suggested alternatives. This cannot therefore be taken to be a definitive list of the factors which should be taken into account.

Furthermore, excluding some of the SA criteria would involve making assumptions that would preclude the gypsy and traveller population from having access to facilities which would be available to the settled population. This would be contrary to the aims of PPTS to ensure fair and equal treatment for travellers.

- 20. The SA was only one of the factors taken into account in the choice of site. A number of other factors were considered. This was in line with the process undertaken for other sites in the Local Plan [CH18.6] and this process has previously been found sound by Inspector Bussey.
- 21. The Council had regard to the matters identified in PPTS as being important considerations for gypsy and traveller policies. Cowling Farm does not perform as well as some of the other suggested sites in relation to some of the matters set out in PPTS. For example, other sites are closer to a GP surgery and the frequency of public transport is not as good here as elsewhere. However, the site is located within Chorley which is identified as a Key Service Centre in the Core Strategy and is therefore deemed to be one of the most sustainable locations for development. The site has also previously been found to be a sound allocation for housing. The site has been SA assessed as falling within Band B sustainability rating, with the most sustainable being Band A. However, all of the alternative sites within Chorley were also rated Band B, with each site performing differently against different SA and PPTS criteria. The Council have also had regard to the criteria set out in Core Strategy Policy 8, with which the proposed site allocation would comply.
- 22. The Council have ruled out sites within the Green Belt. PPTS would allow the making of an "exceptional limited alteration" to the Green Belt boundary in order to allow the allocation of a site to meet a specific identified need. However, there are available sites outside the Green Belt which are capable of accommodating the allocation. As such, I do not consider that the case for such an "exceptional" alteration has been made. Ruling out sites in the Green Belt is in line with the Government's aim to protect Green Belt land from inappropriate development, most recently expressed in its Press Release and amendment to the Planning Practice Guidance in October 2014.
- 23. A number of the alternative sites are more constrained, urbanised sites than the identified site at Cowling Farm. These have been discounted for various reasons set out in CH12.9. In addition to the reasons set out by the Council, it would be necessary on some of the sites for the pitches to be sited in close proximity to existing residential properties. This has the potential to result in a significant level of conflict and animosity and make integration of the communities problematic. Whilst I recognise that there is a significant level of opposition from the settled community to the identified site at Cowling Farm, there is more scope in this case for the location of the pitches to be managed having regard to the proximity to existing residential properties. The allocation also forms part of a larger site allocation for housing and employment uses which is to be taken forward by the development of a Masterplan. This approach would allow for further community involvement in the development of the location of the pitches [CH18.6]. This is a more pragmatic approach than introducing pitches onto smaller sites where they would inevitably be in very close proximity to existing properties. Accordingly,

the discounting of the alternative sites is based on adequate and reasonable justification.

- 24. Concern has been expressed that the employment and housing elements of the mixed use allocation would be blighted by the proposed allocation of gypsy pitches. However, the myths and stereotypes which may have fuelled some of the existing concern can often dissipate once families are settled on a site and become integrated into the community. In relation to the employment use, this concern has been expressed by commercial property agents, amongst others. However, there is nothing to suggest that this is based on anything other than conjecture and fear. There is no evidence to indicate that the allocation of a small (0.4ha) part of the 9.5ha site would result in the blighting of the remaining land or harm the existing business uses. The Masterplanning process can be used to engage with existing business occupiers and ensure that the detailed development of the allocation has regard to their needs.
- 25. Representors question the need for one site of this size rather than a larger number of smaller sites. However, advice in the Government's publication *Designing Gypsy and Traveller Sites: Good Practice Guide* indicates that a site of up to 15 pitches is the optimal size to provide a comfortable environment which is also easy to manage. The proposed allocation has had regard to the needs of the existing gypsy and traveller community, in accordance with PPTS, who have expressed a preference for a site of this size to accommodate an extended family. This would reflect the intention of PPTS to facilitate the gypsy way of life which often involves living in extended family groups. There will be a need for suitable attenuation between employment uses and the gypsy pitches, but there is no evidence that this could not be adequately incorporated on a site of the size proposed.
- 26. There is a Grade II listed building, Cowling Farm, to the south west of the allocated site. The Council prepared heritage impact assessments for each of the alternative sites and English Heritage has confirmed its broad acceptance of the conclusions for each site [CH12.9, CH15.1]. The Masterplan process will provide the opportunity to develop the detailed siting of pitches, dwellings and employment premises and their proximity to the listed building. This will ensure that suitable regard is had to the setting of the building. There is no evidence to indicate that this constraint could not be overcome and I am mindful of the existing designation of the site for housing and employment use which would also have the potential to impact on the setting of the listed building. The proposed allocation would be no different in that regard. The proximity of the listed building to the allocated site would not make the allocation unsound.
- 27. Lancashire County Council (LCC) raises no concerns about traffic generation from the mixed use site. There is no evidence to suggest that there is a need for detailed traffic implications to be known before the gypsy and traveller pitches can be planned in detail. LCC confirms that a satisfactory access for the mixed use site could be provided from Moorland Gate. Alternative options were considered through the Spinners car park and through the Green Belt to the south. Both of these alternatives would have difficulties which would be likely to raise deliverability issues. However, as there is a suitable option available, these issues would not render the proposed allocation unsound.

- 28. The Council have ruled out some alternative sites that were put forward during the 'call for sites' by landowners, developers and members of the public on the basis that they are not in the Council's ownership. Alternative sites put forward by the gypsy and traveller community were discounted for a number of reasons; many are in the Green Belt, in alternative use or have planning permission for alternative uses. In addition, these latter sites appear to have been identified on the basis of their desirability to the gypsy and traveller community rather than their availability. The choice of a site within the Council's ownership and control will ensure that the site is deliverable and I consider this to be a sensible and pragmatic solution.
- 29. The estimated cost of funding pitches on Cowling Farm is the greatest when compared to the alternative site options, due to the need for a longer access road [CH12.9]. The Council have approached the Homes and Communities Agency for funding, although this would be subject to a bidding process [CH18.6]. In any case the Council have confirmed, in its Committee Report dated 4<sup>th</sup> September 2014 [CH12.14] and Minutes dated 23<sup>rd</sup> September 2014 [CH12.15], that it will be able to fund the development and there is no evidence to the contrary. It is therefore reasonable to conclude that the site is likely to be deliverable. The fact that it would be the most expensive option does not make the allocation unsound.
- 30. Given the need for a Masterplan to be prepared, it seems unlikely that pitches could be provided on the site prior to the expiration of the existing temporary planning permission at Hut Lane. However, that is a matter for the Council to resolve separately, it does not affect the soundness of this allocation. There is nothing to suggest that the site could not be delivered within the first five years of the Plan, as required by PPTS.
- 31. Concerns have been expressed that a greater number of pitches may be developed on this site in the future. This will be a matter for consideration at a future point in time. At present, the 2014 GTAA suggests a need for 5 pitches and this allocation is seeking to provide for that identified need. Whether there is a need for further pitches, and the location of any such pitches, is a matter to be determined through the separate GTTS LP.
- 32. In conclusion, the site allocation is consistent with national policy having regard to the aim in the PPTS of increasing the number of traveller sites, addressing under provision and maintaining an appropriate level of supply. The allocation is based on adequate SA and consideration of alternative options. The most appropriate option has been identified having regard to a number of factors which are set out in relevant documents. The fact that there may be other sites which could be allocated for this use does not make this allocation unsound. I conclude that the chosen site has been satisfactorily justified having regard to the alternatives. This part of the Plan, subject to the identified main modifications, is positively prepared, justified, effective and consistent with national planning policy and is therefore sound.

### **Assessment of Legal Compliance**

33. My examination of the compliance of this part of the Plan with the legal requirements is summarised in the table below. I conclude that this part of the Plan meets them all.

LEGAL REQUIREMENTS					
Local Development Scheme (LDS)	The Chorley Local Plan is identified within the approved LDS [CH4.37]. This has been amended to incorporate the revised timescale following suspension of the examination and further work into the allocation of a site for gypsy and traveller pitches. The LDS sets out an expected adoption date of June 2015 [CH19.14]. That part of the Local Plan which is covered by this supplementary report is compliant with the LDS.				
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in October 2006 [CHSD006] and updated in September 2014 [CH19.13] and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes ( <b>MM</b> )				
Sustainability Appraisal (SA)	SA has been carried out for this part of the Plan and is adequate.				
Appropriate Assessment (AA)	The Habitats Regulations Supplement [CH12.11] sets out why further AA is not necessary. Natural England is satisfied with this approach.				
National Policy	That part of the Local Plan which is covered by this supplementary report complies with national policy except where indicated and modifications are recommended.				
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.				
Public Sector Equality Duty (PSED) 2004 Act (as amended) and 2012 Regulations.	That part of the Local Plan which is covered by this supplementary report complies with the Duty. That part of the Local Plan which is covered by this supplementary report complies with the Act and the Regulations.				

### **Overall Conclusion and Recommendation**

- 34. This part of the Plan, relating to Gypsy and Traveller matters, has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issue set out above.
- 35. The Council have requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix this part of the Chorley Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Susan Heywood Inspector This report is accompanied by the Appendix containing the Main Modifications

# Appendix – Main Modifications

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MMEC66A	14 & 27	Paragraph 5.7 and following Policy HS10	<ul> <li>Delete Paragraph 5.7 entitled Gypsy, Traveller and Travelling Showpeople sites and renumber all following paragraphs sequentially to take account of this amendment.</li> <li>Insert new text after Policy HS10:</li> <li>Gypsy, Traveller and Travelling Showpeople Sites</li> <li>5.51 National planning policy 'Planning policy for Traveller sites' (March 2012) highlights that the traditional and nomadic way of life of Gypsies, Travellers and Travelling Showpeople should be facilitated while respecting the interests of the settled community.</li> <li>5.52. Working with Preston and South Ribble a Central Lancashire Gypsy and Traveller Accommodation Assessment (GTAA) was commissioned in July 2013 and finalised in January 2014. The purpose of the study was to assess overall accommodation need and distribution for each participating local authority, undertaken in a manner which conforms to national policy. It found a need for 5 permanent pitches in Chorley and a transit need of 15 pitches across Central Lancashire (If provided individually Chorley's specific need is for 3 transit pitches). No need for a Travelling Showpeople site was found.</li> <li>5.53 In light of this the Council has allocated a site for a minimum of 5 permanent pitches at Cowling Farm, Chorley on 0.4ha of land.</li> <li>5.54 The Council recognises that the Gypsy and Traveller and Travelling Showpeople population can be hard to reach when undertaking GTAAs and that there may be a need resulting from overcrowding on existing sites, concealed households or those living in bricks and mortar which the current GTAA has been unable to identify.</li> <li>5.55 In light of this the Council now commits to undertake further work on the Gypsy and Traveller Accommodation Assessment (GTAA) within 12 months (from February 2014), with a view to resolving the outstanding concerns as highlighted in the annex to the Inspector's letters dated 7 February and 3 March 2014. The Council also makes the commitment to produce jointly with the neighbouring authorities of</li></ul>

Ref	Page	Policy/ Paragraph	Main Modification
			Council recognises the need to ensure fair and equal treatment for the Gypsy and Traveller and Travelling Showpeople communities, and the need to facilitate the traditional and nomadic way of life of Travellers while respecting the interests of the settled community. 5.57 Any future planning applications submitted to the Council relating to Gypsy and Traveller and travelling showpeople sites will be assessed on the basis of the Central Lancashire Core Strategy Policy 8 and the national Planning Policy for Traveller Sites, or any subsequent national policy. 5.58 In order to deliver this site the Council will develop a masterplan describing and illustrating the proposed development form. It will show how that form will achieve the intended vision for the place, and how a distinct and appropriate character will be created. It will also describe how the project will be implemented through a delivery strategy which will set out phasing, timing and funding.
MMEC67A	27	Paragraph 5.58	Add the following policy after paragraph 5.58 (above): Policy HS11: Gypsy and Traveller and Travelling Showpeople Within the mixed use allocation HS1.5/EP1.6 Cowling Farm, provision will be made for a minimum of 5 permanent Gypsy and Traveller pitches on 0.4ha of land.

MMEC68	88	Appendix D	Add the following indicator to the Key Indicators and Targets table:					
				Ref	Indicator	Relevant Policy	Measure	Target
				13	Production of the Gypsy and Traveller and Travelling Show- people Local Plan	HS11: Gypsy and Traveller and Travelling Show- people	Progress against the mile- stones in the Local Develop- ment Scheme (LDS)	To meet milestones in the LDS
MMMEC18A		Policy HS11	Provide for the updating of the Policies Map to include allocation of site HS11 within the mixed use allocation HS1.5/EP1.6 Cowling Farm, Chorley for a minimum of 5 permanent pitches for Gypsies and Travellers as shown on Chorley Town Inset – Map 2.					