



17 June 2013

Emma Tinsley
Principal Planning Officer
Policy and Spatial Planning
Council House
Manor Square
Solihull B91 3QB

Our Ref: 47042498
Your Ref:

Dear Emma

Changes to Gypsy and Traveller Site Allocations Development Plan Document Pre-Submission Draft

Further to your letter dated 13th June 2013 detailing the proposed amendments to the DPD in advance of formal submission; we have considered the potential implications of the following amendments:

- **GTS 1:** Explicit inclusion of measures to promote community safety and social cohesion to be included within site designs;
- **GTS 6:** Clarification over the role of the Communities and Local Government 2008 Designing Gypsy and Traveller Sites Good Practice Guide¹ in relation to small private sites;
- **GTS 6:** Explicit inclusion of measures to promote community safety and social cohesion to be included within site designs;
- **Paragraph 9.1.2:** Provides a commitment to update the Gypsies and Travellers Accommodation Assessment and to address any unmet need through the planning application process.

It has been concluded that overall the changes would have a minor positive effect on several of the sustainability objectives defined for appraisal and presented in Box 2-1 of the Sustainability Appraisal Report².

Further details concerning the consequences of the proposed modifications upon the Sustainability Appraisal can be found in an Annex to this letter.

We trust that this appraisal of the proposed amendments provides you with the necessary re-assurance on the outcomes for the sustainable development objectives.

Should you require any further clarifications then we would be pleased to be of assistance.

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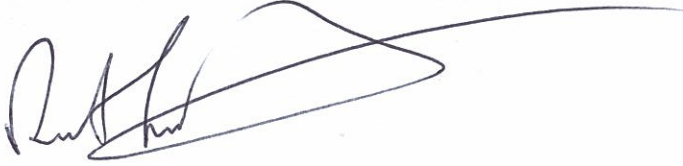
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsysites.pdf

² [http://www.solihull.gov.uk/Attachments/Sustainability Appraisal of Submission Draft DPD.pdf](http://www.solihull.gov.uk/Attachments/Sustainability%20Appraisal%20of%20Submission%20Draft%20DPD.pdf)

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Yours sincerely
for **URS Infrastructure & Environment UK Limited**

A handwritten signature in black ink, appearing to read 'Paul Tomlinson', with a long horizontal flourish extending to the right.

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Annex on the Sustainability Appraisal of the Proposed Amendments to the Gypsy and Traveller Site Allocations Development Plan Document Pre-Submission Draft

Promotion of Community Safety and Social Cohesion

The proposed amendments to provide explicit recognition of community safety and social cohesion within policies GTS 1 and GTS 6 would cause a revision to Table 7.1 of the Sustainability Appraisal Report by the inclusion of an additional “X” located in the cell “clear guidance/ crime”. A revised copy of Table 7-1 is attached to this letter.

In terms of the appraisal of policy GTS 1, explicit recognition of community safety and social cohesion would be expected to deliver “**minor positive**” outcome against the crime sustainability to replace the previous “neutral” outcome.

An identical change also results for policy GTS 6 with the neutral outcome being revised to “**minor positive**”.

Relationship to the Good Practice Guide

The proposed amendment to policy GTS 6 reflects a representation the Council received on the applicability of the Good Practice Guide (GPG) to private sites.

The following paragraphs taken from the GPG provide the context to considering the implications of the proposed amendment upon the sustainability appraisal:

- Para 1.5 highlights the relevance of the GPG to LAs, Social Landlords, private developers and residents,
- Para 1.4 highlights the purpose of the GPG being to familiarise developers with the key elements necessary to design a successful site and to identify good practice.
- Para 1.13 comments that it would not be appropriate to use the GPG in isolation to determine a private application for site development in the case of small private site developments.
- Para 1.14 notes that the guidance is primarily intended for social site provision for Gypsies and Irish Travellers and covers a range of sites including: permanent sites, transit sites and temporary stopping places.

While the proposed policy GTS 6 states that proposals are to have “*regard to*” the GPG rather than “*required to adopt the GPG*”, the proposed amendment would provide uncertainty as to when the GPG becomes relevant as the “*where appropriate*” is not qualified. As a result, the proposed amendment could be seen to lower the likelihood of a positive outcome against several sustainability objectives (Prosperity; Resource efficiency; Losses from flooding; Pollution; Deprivation; Health inequalities; Crime; and Public safety) across all site provision whenever it considered appropriate to do so. It is noted that this dispensation does not apply to the remainder of the policy expectations with regard to site design.

On the basis that “*where appropriate*” is defined as “*small private site development*” that is “*designed to meet individual and personal preferences*” then the amendment is envisaged to affect only a very small proportion of the provision being made available through the Gypsy and Travellers DPD. Consequently, the implications for performance of the policy against the sustainable development framework would be negligible.

While the reasoning for the amendment is clear, it is proposed that the Council may elect to include such transparency within the revised policy GTS 6 or its supporting text by:

- Making it explicit in the policy that regard to the GPG is applicable to all but small private sites; or
- Re-producing GPG para 1.13 within the supporting text to the policy.

Should the Council embrace above recommendation, then no changes would result to the appraisal of policy GTS 6 presented in Table 7-5 of the Sustainability Appraisal.

Gypsies and Travellers Accommodation Assessment

The proposed amendment to paragraph 9.1.2 would emphasise the need to maintain an up to date evidence base of the needs of the gypsy and traveller communities. As such it would aid in the delivery of the plan objective to allocate and grant planning permission for sufficient land and pitches. Nevertheless, the proposed amendment would not have a bearing upon the sustainability objectives and hence the reported sustainability appraisal.

Table 7-1: Appraisal of the proposed plan objectives

SA Objective	Overarching Objective – Increase number of pitches, reducing unauthorised sites, accessible services and respecting neighbours	Sub Objectives				
		Allocate and grant planning permission for sufficient land and pitches	Identify available, suitable and achievable sites	Increase access to local services and facilities	Promote high quality design	Provide clear guidance on deciding planning applications
1. Prosperity						
2. Access to jobs	X					
3. Reducing travel	X	X	X	X		X
4. Resource efficiency	X	X				
5. Greenhouse gases	X	X	X	X		
6. Business adaptation						
7. Losses from flooding	X	X	X			
8. Urban adaptation						
9. Biodiversity	X	X	X			X
10. Landscape	X	X	X			X
11. Green infrastructure	X					
12. Historic environment	X	X	X			X
13. Built environment	X	X	X		X	X
14. Pollution	X	X	X			X
15. Deprivation	X	X	X	X	X	X
16. Housing	X	X	X	X	X	X
17. Commercial Assets						
18. Health inequalities	X	X	X	X	X	
19. Crime					X	X
20. Public safety					X	
21. Mixed development						

