

**Solihull Local Development Framework
Gypsy and Traveller Site Allocations
Development Plan Document**



**Solihull MBC Gypsy and Traveller Site
Allocations Development Plan Document
Regulation 19 Publication Stage
Response Form**

For Office Use Only:	
Date	
Ack	
Ref	

Solihull MBC is seeking your comments on the Gypsy and Traveller Site Allocations Development Plan Document (DPD) Submission Draft. At this stage of preparation of the DPD we are only able to accept representations about whether the document is a) legally compliant and b) sound. Further guidance on completing this form can be downloaded at <http://www.solihull.gov.uk/ldf/28317.htm>.

This form has two parts:

Part A - Personal Details

Part B - Your representation(s).

This form will be used as a formal representation of your support or objection to the Gypsy and Traveller Site Allocations DPD Submission Draft. Please fill in a separate Part B form for each comment you wish to make, and attach to Part A.

PART A: PERSONAL CONTACT DETAILS

1. YOUR DETAILS		2. AGENT DETAILS (*if applicable)
Title	Mr	
Forename	Richard	
Surname	Wheat	
Job Title	Planning and Biodiversity Officer	
Organisation	Warwickshire Wildlife Trust	
Address	Brandon Marsh Nature Centre	
	Brandon Lane	
	Coventry	
Postcode	CV3 3GW	
Email address	richard.wheat@wkwat.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	<input checked="" type="checkbox"/>	Post	<input type="checkbox"/>
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How we will use your personal information: The information you provide will be used by the Council to help prepare the Local Development Framework (LDF) and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the LDF. Additionally, your personal details may be shared with other Solihull MBC departments and partner organisations to ensure our records are kept accurate and to keep you informed of future consultation documents. Please note that the Council is obliged to make representations available for public inspection, this means that with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available for inspection at the Council's principle offices and will also be published on the internet. Should you have any further queries please contact Spatial Planning on 0121 704 6395.

PART B: YOUR REPRESENTATION

Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	6	Page Number	17
Policy Number	GTS1	Paragraph Number	

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support	X	Object	
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes		No	
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Q3b. Please use this space to explain your answer above. Please be as precise as possible.

N/A

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:			
Sound?	Yes	X	No
Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.			
Please select	Test of Soundness		
	The plan is not positively prepared in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
	The plan is not justified in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.		
	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.		
	It is not consistent with national policy .		
Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.			
<p>Warwickshire Wildlife Trust is supportive of the criteria outlined in policy GTS 1 for determining applications for Temporary Stopping Places. In particular we are supportive of the 5th bullet point which states that developers must be able to mitigate for any adverse effects on nature conservation designations, ecology and biodiversity if planning permission is to be approved. We believe this approach ensures that the DPD reinforces protection for key biodiversity assets as set out in policy P10 of the Draft Solihull Local Plan Submission Document and in the NPPF and subsequently contributes towards the pursuit of sustainable development as part of Solihull's LDF.</p>			
Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
<p>Warwickshire Wildlife Trust believes that policy GTS 1 is currently sound on the provision that the stamen in the 5th bullet point remains in the policy.</p>			

Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.

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Q5. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate in person at the examination?				
Written representations	X	Participate at the Examination in Public		
Q5. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:				
Are you attaching any additional sheets that relate to this representation?	No X	Yes	No. of sheets	
Signed:	R.Wheat	Date:	17/05/2013	

All representations must be received at the email or postal address given on this form by 5pm on Friday 17th May 2013. Late representations cannot be accepted.

Completed Forms should be sent to the Spatial Planning team at:

Email: PSP@solihull.gov.uk

Post: **Spatial Planning
Solihull Council
Manor Square
Solihull
B91 3QB**

<p>Please tick this box if you DO NOT wish to be notified when the Gypsy and Traveller Site Allocations DPD is submitted, upon publication of the Inspector's Report and Adopted or be involved in the preparation of future plans and policies.</p>	
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Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	7	Page Number	23
Policy Number	GTS 3	Paragraph Number	

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support	X	Object	
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes	No	
--------------------	-----	----	--

Q3b. Please use this space to explain your answer above. Please be as precise as possible.

N/A

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Sound?	Yes	X	No
<p>Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.</p>			
Please select	Test of Soundness		
	The plan is not positively prepared in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
	The plan is not justified in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.		
	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.		
	It is not consistent with national policy .		
<p>Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.</p>			
<p>Warwickshire Wildlife Trust has no objections to the selection of this site as a strategic allocation but wish to outline the important reference to Bickenhill Plantation Local Wildlife Site (LWS) in the policy text. The LWS consists of woodland and a small remnant area of heathland, the latter being a scarce Local Biodiversity Action Plan habitat within in the sub-region of Warwickshire, Coventry and Solihull The maintenance of the LWS is therefore significant at a county/sub-regional level. It is essential that any proposals that come forward for this site allocation have to demonstrate that no impact on this sub-regionally important site will occur if planning permission is to be granted to ensure that the DPD does not conflict with policy P10 of the Draft Local Plan Submission Document or the principles of the NPPF. The Trust therefore supports the inclusion of this statement within the policy if the allocation is taken forward.</p>			
<p>Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>			
<p>The Trust believes the policy is currently sound on the provision that it maintains the statement requiring the impact on the adjacent LWS to be fully assessed and avoided.</p>			

Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.

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Are you attaching any additional sheets that relate to this representation?		No X	Yes	No. of sheets
Signed:	R.Wheat	Date:	17/05/2013	

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PART B: YOUR REPRESENTATION

Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	7	Page Number	25
Policy Number	GTS 5	Paragraph Number	

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support	X	Object	
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes	No	
--------------------	-----	----	--

Q3b. Please use this space to explain your answer above. Please be as precise as possible.

N/A

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Sound?	Yes	X	No	
<p>Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.</p>				
Please select	Test of Soundness			
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	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.			
	It is not consistent with national policy .			
<p>Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.</p>				
<p>Warwickshire Wildlife Trust has no objections to the selection of this site as a strategic allocation but wish to outline the important reference to Castle Hill Farm Meadows Local Wildlife Site (LWS) in the policy text. The LWS forms one of the largest remaining areas of semi-improved neutral grassland, a Local Biodiversity Action Plan Habitat, within in the sub-region of Warwickshire, Coventry and Solihull so its maintenance is significant at a sub-regional level. It is therefore essential that any proposals that come forward for this site allocation have to demonstrate that no impact on this sub-regionally important grassland site will occur if planning permission is to be granted to ensure that the DPD does not conflict with policy P10 of the Draft Local Plan Submission Document or the principles of the NPPF. The Trust therefore supports the inclusion of this statement within the policy if the allocation is taken forward.</p>				
<p>Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p>				
<p>The Trust believes the policy is currently sound on the provision that it maintains the statement requiring the impact on the adjacent LWS to be fully assessed and avoided.</p>				

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Signed:	R.Wheat	Date:	17/05/2013	

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Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	7	Page Number	21
Policy Number	GTS2	Paragraph Number	7.4

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support	X	Object	
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes		No	
--------------------	-----	--	----	--

Q3b. Please use this space to explain your answer above. Please be as precise as possible.

N/A

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Sound?	Yes	X	No	
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Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.

Please select	Test of Soundness
<input type="checkbox"/>	The plan is not positively prepared in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
<input type="checkbox"/>	The plan is not justified in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.
<input type="checkbox"/>	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.
<input type="checkbox"/>	It is not consistent with national policy .

Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.

Warwickshire Wildlife Trust has no objections to the selection of this site as a strategic allocation but wish to outline the important reference to Castle Hill Farm Meadows Local Wildlife Site (LWS) in the policy text. The LWS forms one of the largest remaining areas of semi-improved neutral grassland, a Local Biodiversity Action Plan Habitat, within in the sub-region of Warwickshire, Coventry and Solihull so its maintenance is significant at a sub-regional level. It is therefore essential that any proposals that come forward for this site allocation have to demonstrate that no impact on this sub-regionally important grassland site will occur if planning permission is to be granted to ensure that the DPD does not conflict with policy P10 of the Draft Local Plan Submission Document or the principles of the NPPF. The Trust therefore supports the inclusion of this statement within the policy if the allocation is taken forward.

The site is situated adjacent to the Low brook which in turn runs adjacent to the LWS outlined above. It is possible that the grassland in the LWS will be hydrologically linked to the brook and so in assessing impacts to the LWS, proposals will need to take account of hydrological contamination and pollution risks. However it must also be acknowledged that the brook itself is also an important ecological receptor in itself as it supports notable populations of a Local Biodiversity Action Plan Species (details of the species can be required if necessary) and so we would like the ecological impact assessment for the LWS expanded to specifically reference the low brook as well. Moreover, the Trust would strongly recommend the policy includes a requirement to buffer the low brook as part of the green infrastructure for the site so that the policy acknowledges potential risks and outlines minimum safeguards and expectations to address them.

Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst the Trust does not believe that the current policy is unsound, we strongly recommend the following changes in order to strengthen the sustainability of the proposals and to ensure that the proposals do not have any adverse effect on the integrity of the LWS, the low brook and a notable population of a Local Biodiversity Action Plan Species:

- 1) Maintain the statement requiring future proposals to demonstrate that Castle Hill Farm Meadows LWS will not be adversely affected
- 2) Expand the existing statement for the LWS to also ensure that impacts on the Low Brook are also taken into consideration; and
- 3) Set out a requirement for a minimum buffer along the low brook as part of the green infrastructure/ soft landscaping proposals for the site to ensure that all key biodiversity features are protected as a matter of policy.

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Email address	richard.wheat@wkwat.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	<input checked="" type="checkbox"/>	Post	<input type="checkbox"/>
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How we will use your personal information: The information you provide will be used by the Council to help prepare the Local Development Framework (LDF) and will be shared with other employees or agencies (such as the Planning Inspectorate) who may be involved with the LDF. Additionally, your personal details may be shared with other Solihull MBC departments and partner organisations to ensure our records are kept accurate and to keep you informed of future consultation documents. Please note that the Council is obliged to make representations available for public inspection, this means that with the exception of telephone numbers, email addresses and signatures, your comments and other personal details that you provide will be publicly available for inspection at the Council's principle offices and will also be published on the internet. Should you have any further queries please contact Spatial Planning on 0121 704 6395.

PART B: YOUR REPRESENTATION

Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	8	Page Number	26
Policy Number	GTS 6	Paragraph Number	8.1

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support		Object	X
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes		No	
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Q3b. Please use this space to explain your answer above. Please be as precise as possible.

n/a

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:			
Sound?	Yes	No	X
Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.			
Please select	Test of Soundness		
	The plan is not positively prepared in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
	The plan is not justified in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.		
	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.		
X	It is not consistent with national policy .		
Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.			
<p>The NPPF states that the planning system should contribute towards the protection <u>and</u> enhancement of the natural and local environment. It requires local planning authorities to set out a strategic approach in their local plans, positively planning the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Whilst we accept that the small scale of gypsy /traveller sites will not be expected to deliver a substantial gain for biodiversity, there are opportunities to incorporate biodiversity in and around development as part of landscaping, drainage and climate change mitigation and adaptation proposals. Subsequently, we believe that if the DPD is to comply with the NPPF principles above, this policy should take full account of the opportunities to integrate biodiversity into all new Gypsy/Traveller sites by promoting green infrastructure planning and designing in biodiversity as an integral part of high quality design.</p>			
Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
<p>In order to maximise the contribution the DPD makes towards protecting and enhancing biodiversity, the Trust recommends that policy GTS6 is expanded to promote biodiversity enhancements within a site, consistent with a green infrastructure approach to planning, as a part of high quality design. We believe that this will:</p> <ul style="list-style-type: none"> - optimise the opportunities to achieve improvements to the borough's biodiversity and natural environment, in accordance with the principles in the NPPF, - contribute towards the pursuit of sustainable development in the local plan; and - Ensure cross compliance between the DPD and policies P10 and P15 of the Draft Solihull Local Plan Submission Document. 			

Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.

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Q5. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate in person at the examination?				
Written representations	<input checked="" type="checkbox"/>	Participate at the Examination in Public	<input type="checkbox"/>	
Q5. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:				
Are you attaching any additional sheets that relate to this representation?	<input type="checkbox"/>	<input type="checkbox"/>	No. of sheets	
Signed:	R.Wheat	Date:	17/05/2013	

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Completed Forms should be sent to the Spatial Planning team at:

Email: PSP@solihull.gov.uk

Post: **Spatial Planning
Solihull Council
Manor Square
Solihull
B91 3QB**

Please tick this box if you DO NOT wish to be notified when the Gypsy and Traveller Site Allocations DPD is submitted, upon publication of the Inspector's Report and Adopted or be involved in the preparation of future plans and policies.	<input type="checkbox"/>
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Additional copies of this form can be accessed from the Council's website at www.solihull.gov.uk/ldf/28317.htm. If you have any further queries, please contact the Spatial Planning team on 0121 704 6428.

Thank you for taking the time to complete this representation.

**Solihull Local Development Framework
Gypsy and Traveller Site Allocations
Development Plan Document**



**Solihull MBC Gypsy and Traveller Site
Allocations Development Plan Document
Regulation 19 Publication Stage
Response Form**

For Office Use Only:	
Date	
Ack	
Ref	

Solihull MBC is seeking your comments on the Gypsy and Traveller Site Allocations Development Plan Document (DPD) Submission Draft. At this stage of preparation of the DPD we are only able to accept representations about whether the document is a) legally compliant and b) sound. Further guidance on completing this form can be downloaded at <http://www.solihull.gov.uk/ldf/28317.htm>.

This form has two parts:

Part A - Personal Details

Part B - Your representation(s).

This form will be used as a formal representation of your support or objection to the Gypsy and Traveller Site Allocations DPD Submission Draft. Please fill in a separate Part B form for each comment you wish to make, and attach to Part A.

PART A: PERSONAL CONTACT DETAILS

1. YOUR DETAILS		2. AGENT DETAILS (*if applicable)
Title	Mr	
Forename	Richard	
Surname	Wheat	
Job Title	Planning and Biodiversity Officer	
Organisation	Warwickshire Wildlife Trust	
Address	Brandon Marsh Nature Centre	
	Brandon Lane	
	Coventry	
Postcode	CV3 3GW	
Email address	richard.wheat@wkwat.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	<input checked="" type="checkbox"/>	Post	<input type="checkbox"/>
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PART B: YOUR REPRESENTATION

Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	5	Page Number	15
Policy Number	n/a	Paragraph Number	5.3.2

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support		Object	X
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes	No
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Q3b. Please use this space to explain your answer above. Please be as precise as possible.

n/a

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:			
Sound?	Yes	No	X
Q4b. If you consider the Gypsy and Traveller Site Allocations DPD is unsound, please identify which test of soundness your representation relates to by placing a cross by the appropriate box.			
Please select	Test of Soundness		
	The plan is not positively prepared in that it is not prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.		
	The plan is not justified in that it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.		
	It is not effective in that the plan is not deliverable over its period and based on effective joint working on cross boundary strategic priorities.		
X	It is not consistent with national policy .		
Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.			
<p>The NPPF states that all local authorities should aim to minimise impacts on biodiversity in order to contribute towards the Government’s commitment to halt the overall loss of biodiversity. It further states that to achieve this, local authorities should take a strategic approach to biodiversity protection in their local plans by locating developments on sites with ‘less harmful impacts’. In our response to the preceding challenges, Warwickshire Wildlife Trust recommended that the DPD acknowledges the challenge of meeting Gypsy/Traveller accommodation needs whilst safeguarding the borough’s biodiversity and natural environment. We believe this will be important for ensuring that the DPD includes objectives, polices and a site allocation criteria that embodies the above principles of the NPPF.</p> <p>As the strategy currently omits the above challenge, there are no subsequent objectives within the DPD that require decisions on Gypsy/Traveller sites to take account of their impacts on biodiversity and the natural environment. In turn without such an objective, there is no context for including biodiversity and the natural environment in site design and selection policies and for using it to justify decisions on the most sustainable site allocations. The subsequent effect of this infers that the protection of biodiversity and the natural environment is an integral part of decision making in the DPD, which makes it currently inconsistent with the principles of the NPPF and of the aims and objectives of the Draft Solihull Local Plan Submission Document.</p>			
Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
<p>Warwickshire Wildlife Trust recommends that the sub-objectives in paragraph 5.3.2 include some reference to the protection of biodiversity and the natural environment. We believe this would ensure that the DPD provides the necessary justification for including biodiversity and natural environment protection into the proceeding policies and site allocation criteria; subsequently aligning the DPD with the principles of the NPPF. It will also ensure that the objectives in the Gypsy/Traveller DPD are consistent with objective K and Policy P10 of the Solihull draft Local Plan Submission document.</p>			

Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.

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Q5. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate in person at the examination?				
Written representations	X	Participate at the Examination in Public		
Q5. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:				
Are you attaching any additional sheets that relate to this representation?	No X	Yes	No. of sheets	
Signed:	R.Wheat	Date:	17/05/2013	

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Post: **Spatial Planning
Solihull Council
Manor Square
Solihull
B91 3QB**

Please tick this box if you DO NOT wish to be notified when the Gypsy and Traveller Site Allocations DPD is submitted, upon publication of the Inspector's Report and Adopted or be involved in the preparation of future plans and policies.	
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Thank you for taking the time to complete this representation.

**Solihull MBC Gypsy and Traveller Site
Allocations Development Plan Document
Regulation 19 Publication Stage
Response Form**

For Office Use Only:	
Date	
Ack	
Ref	

Solihull MBC is seeking your comments on the Gypsy and Traveller Site Allocations Development Plan Document (DPD) Submission Draft. At this stage of preparation of the DPD we are only able to accept representations about whether the document is a) legally compliant and b) sound. Further guidance on completing this form can be downloaded at <http://www.solihull.gov.uk/ldf/28317.htm>.

This form has two parts:

Part A - Personal Details

Part B - Your representation(s).

This form will be used as a formal representation of your support or objection to the Gypsy and Traveller Site Allocations DPD Submission Draft. Please fill in a separate Part B form for each comment you wish to make, and attach to Part A.

PART A: PERSONAL CONTACT DETAILS

1. YOUR DETAILS		2. AGENT DETAILS (*if applicable)
Title	Mr	
Forename	Richard	
Surname	Wheat	
Job Title	Planning and Biodiversity Officer	
Organisation	Warwickshire Wildlife Trust	
Address	Brandon Marsh Nature Centre	
	Brandon Lane	
	Coventry	
Postcode	CV3 3GW	
Email address	richard.wheat@wkwat.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	X	Post	
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Name	Richard Wheat	Organisation	Warwickshire Wildlife Trust
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Please fill in the questions below and clearly explain your comments in the relevant sections. Use one form per comment. Further sheets are available to download and you may use as many additional sheets as necessary.

Q1. Which part of the Gypsy and Traveller Site Allocations DPD does your comment relate to?

Chapter Number	5	Page Number	14
Policy Number	n/a	Paragraph Number	5.1.2

Q2. Do you wish to support or object to this part of the Gypsy and Traveller Site Allocations DPD?

Support		Object	X
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Q3a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:

Legally Compliant?	Yes		No	
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Q3b. Please use this space to explain your answer above. Please be as precise as possible.

n/a

Q3c. Please set out what change(s) you consider necessary to make the DPD legally compliant and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

Q4a. Do you consider this part of the Gypsy and Traveller Site Allocations DPD is:			
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Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.			
<p>The NPPF states that all local authorities should aim to minimise impacts on biodiversity in order to contribute towards the Government’s commitment to halt the overall loss of biodiversity. It further states that to achieve this, local authorities should take a strategic approach to biodiversity protection in their local plans by locating developments on sites with ‘less harmful impacts’.</p> <p>Warwickshire Wildlife Trust subsequently believes that the DPD must acknowledge the challenge of meeting Gypsy/Traveller accommodation needs with the protection of the borough’s biodiversity and natural environment to ensure that the proceeding objectives, policies and strategic site allocation criteria all embody the principles of the NPPF outlined above. The current omission of this challenge, together with the absence of an objective on this matter, is considered to be inconsistent with the principles of the NPPF.</p>			
Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to make the DPD sound and give your reasons. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.			
<p>In order to align this chapter with the NPPF, the Trust strongly recommends that the sub-challenges listed in paragraph 5.1.2 include a reference to protecting biodiversity and the natural environment. We believe that including this challenge at the outset of the strategy will identify a need, and provide an important context, for biodiversity protection in the proceeding objectives, policies and site allocation criteria. It will also ensure that challenges in the Gypsy/Traveller DPD are consistent with Challenge and objective K and Policy P10 of the Solihull draft Local Plan Submission document. Suggested wording for incorporating biodiversity and the natural environment into the challenges is suggested below:</p> <ul style="list-style-type: none"> - ‘Safeguarding and minimising impacts to the borough’s biodiversity and natural environment whilst facilitating sufficient land to meet the identified demand for Gypsy/Traveller accommodation’. 			

Please note your representation should cover all information succinctly and include all the information, evidence and supporting information necessary to support/justify the representation and suggested change.

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Written representations	<input checked="" type="checkbox"/>	Participate at the Examination in Public	<input type="checkbox"/>	
Q5. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:				
Are you attaching any additional sheets that relate to this representation?	<input type="checkbox"/>	<input type="checkbox"/>	No. of sheets	<input type="text"/>
Signed:	R.Wheat	Date:	17/05/2013	

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