

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@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Х	Post	

Name Richard Wheat		Orgai	nisation	Warwick	shire Wildlife Trust	
Please fill in the questions below and form per comment. Further sheets ar					I	
sheets as necessary.	e avai	iable t	o dowilload	a anu you	may use as many addition	aı
Q1. Which part of the Gypsy and Trav	eller 9	Site All	ocations DI	PD does y	our comment relate to?	
Chapter Number	6		Page Num	ber	17	-
Policy Number	GTS1		Paragraph	Number		- 31
Q2. Do you wish to support or object	to thi	s part o	of the Gyps	y and Tra	veller Site Allocations DPD	?
Support	Х		Object			
Q3a. Do you consider this part of the	Gypsy	and T	raveller Sit	e Allocatio	ons DPD is:	
Legally Compliant?	Yes				No	
Q3b. Please use this space to explain	your a	answer	above. Ple	ase be as	precise as possible.	
Q3c. Please set out what change(s) yo give your reasons. It will be helpful if	you a	re able	to put forv		V 20 10 10 10 10 10 10 10 10 10 10 10 10 10	
any policy or text. Please be as precis	e as p	ossibie				

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After this stage, further submissions will only be at the request of the Inspector, based on the matters he/she identifies for examination.

		n seeking a change ticipate in person			presentations or do you
Written re	epresentations	Х	Participate at th	e Examinatio	n in Public
4	wish to participa necessary:	te at the oral part	of the examinati	on, please ou	tline why you consider
1000	ttaching any addi		No X	Yes	No. of sheets

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

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.

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.



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Surname	Wheat	
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Organisation	Warwickshire Wildlife Trust	
Address	Brandon Marsh Nature Centre	
	Brandon Lane	
	Coventry	
Postcode	CV3 3GW	
Email address	richard.wheat@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Х	Post	

form per c sheets as i	comment. Further sheets are necessary.	e availabl		mments in the relevant sections	. Use one
form per c sheets as I Q1. Which	comment. Further sheets are necessary.	e availabl			. Use one
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Chapter N		eller site	Allocations DF	D does your comment relate to	?
	umber	7	Page Num	ber	23
Policy Nun	nber	GTS 3	Paragraph	Number	
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Legally Cor	mpliant?	Yes		No	
Q3b. Pleas	se use this space to explain	your ansv	wer above. Ple	ase be as precise as possible.	
				make the DPD legally complian	
	or text. Please be as precis			vard your suggested revised wor	aing of
N/A					

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. Test of Soundness The plan is not positively prepared in that 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. Warwickshire Wildlife Trust has no objections to the selection of this site as a strategic allocation bu wish to outline the important reference to Bickenhill Plantation Local Wildlife Site (LWS) in the polic text. The LWS consists of woodland and a small remnant area of heathland, the latter being as scarce Local Biodiversity Action Plan habitat within in the sub-region of Warwickshire, Coventry and Solihu 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 DP does not conflict with policy P10 of the Draft Local Plan Submission Document or the principles of th NPPF. The Trust therefore supports the inclusion of this statement within the policy if the allocation is taken forward. Q4d. If you consider the Gypsy and Traveller Site Allocations DPD unsound, please set out what change(s) you consider necessary to	Sound?		Yes	X	No		
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Q5. Can y	our representation	n seeking a chang	e be considered b	y written rep	resentations or do you	
consider i	t necessary to par	ticipate in person	at the examinati	on?		
Written re	epresentations	X	Participate at th	e Examinatior	n in Public	
Q5. If you	wish to participat	e at the oral part	of the examinati	on, please ou	tline why you consider	
this to be	necessary:					
Are yeur	*********	ional shaats that	No V	l V	N- del	
	ttaching any addit		No X	Yes	No. of sheets	
	this representation	1f				
Signed:	R.Wheat		Date:	17/05/20)13	

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

For Office	e Use Only:	
Date		
Ack		
Ref		

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Part A - Personal Details

Part B - Your representation(s).

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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@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Х	Post	
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Name	Richard Wheat		Orgai	nisation	Warwick	shire Wildlife Trust	
						_	
	l in the questions below and						
	comment. Further sheets ar necessary.	e avai	iable t	o download	and you	may use as many ad	ditional
	h part of the Gypsy and Trav	veller S	Site All	ocations DI	PD does ye	our comment relate	to?
Chapter I	Number	7		Page Num	ber	7. 17.0 20.0 8.0	25
Policy Nu	mber	GTS	5	Paragraph	Number		
Q2. Do y	ou wish to support or object	to thi	s part o	of the Gyps	y and Trav	veller Site Allocation	s DPD?
Support	1100	Х		Object			
Q3a. Do	you consider this part of the	Gypsy	y and T	raveller Sit	e Allocatio	ons DPD is:	1
Legally C	ompliant?	Yes				No	
Q3b. Plea	ase use this space to explain	your a	answei	r above. Ple	ase be as	precise as possible.	
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	se set out what change(s) yo					N. S.	
2	reasons. It will be helpful if				vard your	suggested revised w	ording of
	y or text. Please be as precis	se as p	ossible	: .			
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Q4a. Do	you consider this part of the	Gypsy	and T	raveller Site	Allocatio	ns DPD is:	

	Test of Soundness The plan is not post seeks to meet obje	relates to	by placing a cro	D is unsound, please oss by the appropriat						
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	seeks to meet obje		pared in that is		Test of Soundness					
			The plan is not positively prepared in that is not prepared on a strategy which							
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	including unmet requirements from neighbouring authorities where it is reasonable									
	to do so and consistent with achieving sustainable development.									
	The plan is not just	ified in tha	t it is not the m	nost appropriate strat	tegy when					
				es, based on proport						
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	effective joint work	-		rategic priorities.						
	It is not consistent	with natio	nal policy.							
Q4c. Please use th	is space to explain y	our answe	r to Q4a above	. Please be as precise	as possible.					
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change(s) you con you are able to pu as possible. The Trust believes	sider necessary to m at forward your sugg	ake the Di ested revis	PD sound and g ed wording of n the provision	PD unsound, please s give your reasons. It was any policy or text. Plant that it maintains the and avoided.	will be helpful if ease be as precise					

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Written re	epresentations	X	Participate at th	e Examinatio	n in Public	
	wish to participa necessary:	te at the oral part	of the examinati	on, please ou	tline why you consid	der
Are you a	ttaching any addi	tional sheets that	No X	Yes	No. of sheets	
	ttaching any addi		No X	Yes	No. of sheets	

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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@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Х	Post	
		and the second second		

Name	me Richard Wheat		Organisation Warwi		Warwick	shire Wildlife Trust	
	in the questions below an						
	necessary.				•		
Q1. Whic	h part of the Gypsy and Tra	aveller	Site All	ocations DI	PD does yo	our comment relate	to?
Chapter I	Number	7		Page Num	ber		21
Policy Nu	licy Number GTS2		2	Paragraph	Number		7.4
Q2. Do y	ou wish to support or object	t to thi	is part	of the Gyps	y and Trav	eller Site Allocation	ns DPD?
Support		Х		Object			
Q3a. Do	ou consider this part of th	e Gyps	y and T	raveller Sit	e Allocatio	ons DPD is:	
Legally Co	ompliant?	Yes				No	
Q3b. Plea	se use this space to explai	n your	answei	above. Ple	ase be as	precise as possible.	
Q3c. Plea	se set out what change(s)	you cor	nsider r	necessary to	make the	e DPD legally compl	iant and
give your	reasons. It will be helpful	if you a	re able	to put forv	vard your	suggested revised v	vording of
	y or text. Please be as prec	ise as p	ossible	·.			
N/A							
Q4a. Do	ou consider this part of th	e Gypsy	y and T	raveller Site	e Allocatio	ons DPD is:	
Sound?		Yes		Х		No	
	ou consider the Gypsy and undness your representati						

Please select	Test of Soundness
	The plan is not positively prepared in that 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.

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:

- 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.

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 re	presentations	X	Participate at th	e Examinatio	n in Public
Q5. If you this to be	- W - N	te at the oral part	of the examinati	on, please ou	tline why you conside
					All and a second se
Are you at	taching any addi	tional sheets that	No X	Yes	No. of sheets
10	taching any addi		No X	Yes	No. of sheets

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Organisation	Warwickshire Wildlife Trust	
Address	Brandon Marsh Nature Centre	
	Brandon Lane	
	Coventry	
Postcode	CV3 3GW	
Email address	richard.wheat@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

				-
Which is your preferred method of contact?	Email	X	Post	

Name	Richard Wheat		Orga	nisation	Warwick	shire Wildlife Trust	
	Commence Com	W 25 W			-		
	I in the questions below and						2.000
	comment. Further sheets ar necessary.	e avai	lable t	o download	d and you	may use as many add	ditional
	th part of the Gypsy and Trav	veller :	Site All	ocations D	PD does y	our comment relate t	:0?
Chapter I		8		Page Num			26
Policy Nu		GTS	6	Paragraph			8.1
Q2. Do y	ou wish to support or object	to thi	s part			veller Site Allocations	
Support				Object			Х
Q3a. Do	you consider this part of the	Gypsy	y and T	raveller Sit	e Allocation	ons DPD is:	
Legally C	ompliant?	Yes	*			No	
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Q4c. Please use this space to explain your answer to Q4a above. Please be as precise as possible.

The NPPF states that the planning system should contribute towards the protection and 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.

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.

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:

- 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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters he/she identifies for examination.

Written represen	tations	х	Participate at th	e Examinatio	n in Public
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Are you attaching			No X	Yes	No. of sheets

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Post:

Spatial Planning Solihull Council Manor Square

Solihull B91 3QB

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

For Offic	e 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@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Х	Post	

	w and clear		Warwickshire Wildlin	
necessary.			mments in the relevar d and you may use as I	Constitution of the Consti
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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.

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.

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.

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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters he/she identifies for examination.

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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@wkwt.org.uk	
Telephone No.	024 7630 2912	
Mobile No.	N/a	

Which is your preferred method of contact?	Email	Y	Post	
Willeli is your preferred metriod or contact.		100		

Name	Richard Wheat		Orga	nisation	Warwickshire Wildlife	e Trust
	ll in the questions below and comment. Further sheets ar					
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Please select	Test of Soundness					
	The plan is not positively prepared in that 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.

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'. 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.

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.

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:

 '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'.

After this stage, further submissions will only be at the request of the Inspector, based on the matters he/she identifies for examination.

Q5. Can yo	our representatio	n seeking a change	e be considered l	y written rep	resentations or do you				
consider i	t necessary to par	ticipate in person	at the examinati	on?					
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Signed:	R.Wheat		Date:	17/05/20	013				

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