



SA of the Solihull Gypsy and Traveller Site Allocations DPD

Final SA Report: Non-
Technical Summary

March 2013

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SUSTAINABILITY APPRAISAL REPORT: NON-TECHNICAL SUMMARY

The purpose of the sustainability appraisal report is to appraise the social, environmental and economic effects of a plan from the outset. In doing so it will help ensure that decisions are made that contribute to achieving sustainable development.

Introduction

This is a non-technical summary of the Sustainability Appraisal (SA) Report for the Submission Draft Gypsy and Traveller Site Allocations Development Plan Document (DPD) prepared by Solihull Metropolitan Borough Council („the Council).

The Solihull Gypsy and Traveller Site Allocations DPD is part of the Local Development Framework (LDF) for Solihull. The main document in the LDF is the Solihull Local Plan which sets out the long-term spatial vision for how the Borough will develop and change up to 2028. With regard to housing, the Council aims to ensure that everyone, including Gypsies and Travellers, has the opportunity to access a decent and safe home. The shortage of authorised Gypsy and Traveller sites to meet identified need is one of the key challenges for the Solihull Draft Local Plan to address.

The overarching objective to deliver the vision identified within the Solihull Gypsy and Traveller Site Allocations DPD is set out in the Solihull Draft Local Plan submission document. It is as follows:

“To increase the number of authorised pitches for Gypsies and Travellers in the Borough in the most appropriate locations, to reduce the number of unauthorised developments and encampments and enable Gypsies and Travellers to access the services and facilities to meet their needs, whilst respecting the interests of the settled community.” (Solihull Draft Local Plan -Submission Document September 2012).

In order to achieve this overarching objective, the DPD identifies a series of further sub-objectives, which are to:

- Identify sites that are available, suitable and achievable;
- Allocate and grant planning permission for sufficient land and pitches to meet identified needs within Solihull Borough in the most appropriate locations;
- Increase access to local services and facilities including health, education, fresh food and employment by allocating sites and pitches in the most suitable locations to enable this;
- Ensure sites are of high quality design, safe and pleasant places to live; and

- Provide clear guidance for making decisions on planning applications regarding Gypsy and Traveller sites.

A series of policies are set out within the Gypsy and Traveller Site Allocations DPD. These include the following.

- Policy GTS 1 - Temporary Stopping Places.
- Site specific policies, which allocate specific sites for Gypsy and Traveller use:
 - Policy GTS 2 - Old Damson Lane;
 - Policy GTS 3 – The Warren;
 - Policy GTS 4 – The Uplands; and
 - Policy GTS 5 – The Haven;
- Policy GTS 6 – Detailed Planning Considerations.
- Policy GTS 7 – Safeguarding.

The SA seeks to promote sustainable development through ensuring that social, environmental and economic considerations are appropriately reflected in the plan. Certain plans must undergo a SA incorporating a Strategic Environmental Assessment that considers the environmental consequences of the plan.

The SA process provides information on the effects of the plan to the local community; contributes to the evidence base and aids the plan preparation process.

The SA process comprises five stages:

- **Stage A:** Assemble evidence base and prepare Scoping Report;
- **Stage B:** Appraise plan objectives, options and policies and propose steps to reduce adverse impacts and indicators to monitor the plan's sustainability;
- **Stage C:** Prepare SA Report on the process and findings;
- **Stage D:** Consult on the plan and SA Report;
- **Stage E:** Monitor implementation and sustainability effects.

With publication of the SA Report and this summary, the appraisal is now in Stages C/D.

Evidence Base

The primary source of evidence to inform the appraisal is the 2008 SA Scoping Report. This document identifies a range of sustainability issues that might potentially be affected by the policies set out within the Gypsy and Traveller Site Allocations DPD. However, the Scoping Report does not focus on particular sustainability issues associated with the

Gypsy and Traveller population, and so there has been a need to undertake a review of additional evidence.

In November 2011 Solihull Metropolitan Borough Council commissioned the Salford Housing & Urban Studies Unit (SHUSU) at the University of Salford to produce a Gypsy and Traveller Accommodation Assessment (GTAA)¹ for the Borough. The primary purpose of the report was to provide an evidence base to inform the future development of planning policies through the LDF. The GTAA highlights that there is no one source of information about the size of the Gypsy and Traveller population in the Borough. The report estimates that there are at least 325 local Gypsies and Travellers living in the Borough.

The survey of Gypsies and Travellers within the assessment identified some of the important characteristics of the local population:

- Household size is larger than in the settled / non-Traveller population at 3 persons across the whole sample;
- A significant proportion of the sample (16%) were households over 60 years of age;
- The majority of Gypsies and Travellers in trailers and in housing can be seen to belong, in some way, to the Borough. The vast majority of people had lived in the Borough for over 10 years. Many of these were born or had strong family links in the area;
- The local population is dominated by Romany Gypsies (72%) with a smaller number of Irish Travellers (19%); and
- The majority of households reported that they never travel. A number of those who no longer travelled cited education, health and age related reasons for becoming more sedentary. However, reasons attributed to a precarious position with regards to planning permission and / or wanting to be more settled were also common reasons for not travelling.

The GTAA indicates that the total need for gypsy and traveller accommodation within Solihull from 2012 to 2027 is 38 pitches. However, Since the GTAA was finalised, 7 pitches have been granted planning permission on the Old Damson Lane site. Therefore, the number of pitches required has been reduced to 31.

The key environmental characteristics associated with the four sites allocated in the DPD are provided in Chapter 4 of the SA Report. All sites proposed for allocation are located in the Green Belt.

Likely future of the baseline without implementation of the DPD

Failing to deliver adequate sites for Gypsies and Travellers could have the following consequences:

¹ „Solihull Gypsy and Traveller Accommodation Assessment (2012) prepared by Solihull Council. Document available from: http://www.solihull.gov.uk/Attachments/FINAL_Report_-_Solihull_GTAA_Feb_2012.pdf?bcsi_scan_AB11CAA0E2721250=1

- Increase in the number of unauthorised sites (or certainly a continuation of the current problem of unauthorised developments and encampments) and resulting tensions with the settled community;
- Pressure to grant temporary planning permission due to the lack of a 5 year supply of sites;
- Pressure to grant planning permission for applications in more unsuitable locations – with the Council’s failure to identify sites to meet assessed need being given significant weight at any subsequent planning appeal;
- More planning appeals for Gypsy and Traveller sites being refused planning permission (cost implications for the local authority);
- More planning enforcement against unauthorised Gypsy and Traveller sites (cost implications for the local authority);
- Social sustainability implications of reinforcing the cycle of nomadism for those Gypsies and Travellers who may prefer a more settled existence. Similarly, lack of authorised sites could have implications for the health and education of Gypsy and Traveller families as they are continually moved on;
- Failure of the Council’s duty to meet its obligations;
- Uncertainty for the Gypsy and Traveller community and the settled community.

Sustainability Context – European, National and Local Policies

There are many European and National requirements and policies in place that promote sustainable development. These deal with subjects such as air quality, wildlife, climate change, landscape, renewable energy, sustainable development, transport, waste and water. The SA Report provides a review of these requirements identifying where they are relevant to the Gypsy and Traveller Site Allocations DPD.

Details of the National and Local policies that relate to Gypsies and Travellers can be found in Chapter 3 of the SA Report.

Sustainability Objectives

Using the information gained from the 2008 Scoping Report, consultation feedback along with an understanding of the problems, opportunities, and baseline situation, a set of sustainability objectives were developed. These were used to “test” the performance of the Gypsy and Traveller Site Allocations DPD objectives to judge how far they promote sustainable development. They were also used as a framework against which the Gypsy and Traveller Site Allocations DPD policies were tested. The sustainability objectives are set out below.

1. Contribute to regeneration and economic development initiatives spatially targeted towards specific community groups
2. Reduce the number of people with access difficulties to employment, education and training opportunities
3. Ensure that the location of development makes efficient use of existing physical infrastructure and helps to reduce the need to travel
4. Minimise the use of natural resources, such as land, water and minerals, and minimise waste, increase reuse and recycling and manage within the Borough/Sub-region
 - Deliver reductions in the quantity of water used in the Borough
 - Deliver reductions in the waste arisings and to move up the waste hierarchy
 - Use brownfield sites where appropriate and there is no net loss of ecological value
 - To promote resource efficiency
5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation
 - Deliver quantified reductions in emissions by 2020 that contribute to the 34% reduction target
 - Encourage reduced energy use, use of distributive energy systems and renewable energy
6. Assist in the adaptation businesses need to become resource efficient and also deliver more sustainable products and services better equipped to a changing market place caused by climate change
7. Manage, maintain and where necessary improve drainage to reduce economic losses from flooding
8. Ensure that development provides for adaptation to urban heating and high winds
9. Enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species
10. Manage the landscape effects of development in recognition of the European Landscape Convention as well as the risks and opportunities associated with measures to address climate change
11. Facilitate the delivery and enhance the quality of areas providing green infrastructure
12. Enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects
13. Deliver improvements in townscape and enhance local distinctiveness
14. Minimise air, soil, water, light and noise pollution
 - Continue to deliver reductions in particulate and nitrogen dioxide levels
 - Manage drainage network to ensure no detriment to surface water quality
 - Reduce the intrusion of urban and highway lighting
 - Deliver reductions in road traffic noise focusing upon „First Priority Locations’
 - Conserve soils thereby supporting other objectives
15. Improve community capital and reduce social isolation across the social gradient
16. Improve the supply and affordability of housing in those areas of greatest need
17. Ensure the Borough’s national and regional assets reflect wider needs
18. Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles
19. Reduce crime, fear of crime and anti-social behaviour
20. Enhance public safety
21. Encourage development with a better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all

How the Appraisal was undertaken

The appraisal seeks to forecast „significant effects’ from a baseline situation without the plan, drawing on the sustainability objectives presented in Chapter 2 of the SA Report as a methodological framework. Chapter 6 of the SA Report sets out the appraisal methodology in full.

Appraisal Findings

A summary of the appraisal findings set out within the Chapter 7 of the SA Report is provided below.

Appraisal of the plan objectives

The overarching objective and sub-objectives identified within the Gypsy and Traveller Site Allocations DPD provide more depth and identify measurable targets for the vision. The overarching objective and each sub objective is consistent with at least one of the SA objectives. Four of the SA objectives are not covered by the overarching objective or any of the sub objectives. These SA objectives include 1 (Prosperity), 6 (Business adaptation), 8 (Urban adaptation), 17 (Commercial assets), and 21 (Mixed development). However, this can be attributed to the specific nature of the DPD as it focuses narrowly on the allocation of sites for gypsies and travellers.

Appraisal of the strategy for allocating sites

The majority of effects are forecast to be „neutral’. In relation to the objective of „meeting housing needs’, a significant positive effect is anticipated. It is anticipated that the strategy has the potential to be an effective means of meeting Gypsy and Traveller housing needs. While implementing the strategy, it is recommended that the Council should ensure that family groups are able to remain on sites together, as far as is possible; and that careful consideration is given to any approach that would increase the need for family groups to have to share sites.

Policy GTS 1 (Temporary Stopping Places)

In summary, the implementation of this policy has a minor positive effect on four of the SA objectives. When applied together, with the Government’s „Designing Gypsy and Traveller Sites – Good Practice Guide’, the policy provides an appropriate framework for addressing the sustainability issues identified by the SA framework.

Summary of site allocation policies (GTS 2 – 5)

In summary, three of the four sites (Land off Old Damson Lane; The Warren; The Uplands) are well placed to reduce the need to travel, address health inequalities through equitable access to a GP and fresh food, including through active travel (walking and cycling) and meet the requirements of a sustainable location, in terms of being well related to jobs and basic services. The exception is the Haven site, which is poorly located in relation to accessing basic services, especially by walking or cycling. However this site is phased to come forward post 2017 and the situation in this respect may have improved by the time

the site is brought forward for development. The Uplands site is not as well located in relation to the strategic road network as the other three sites, or the other rejected site options, but still has reasonable access nevertheless.

Two of the four sites suffer from flood risk issues (Land off Old Damson Lane; and The Warren), which are addressed through individual site allocation policies for these sites. Caravans are likely to be particularly vulnerable to flood risk. However, policies GTS 2 and 3 incorporate measures that set out the need to ensure flood risk associated with the delivery of gypsy and traveller pitches are dealt with.

All four of the sites are located in areas of lower landscape sensitivity, where the potential effects on residential amenity through light and noise pollution and visual impact are likely to be negligible and where they would relate well in terms of size and scale in relation to the settled community. However three of the four sites (Land off Old Damson Lane; The Warren; and The Haven) are located in close proximity to Local Wildlife Sites (LWS) which may cause indirect adverse effects on biodiversity and green infrastructure. Policies GTS 2, 3 and 5 highlight the need for proposals on these sites to demonstrate that there would be no potential effect on the LWSs.

All four sites score highly in terms of their contribution to meeting the identified accommodation needs of the Gypsy and Traveller community. In particular, the land off Old Damson Lane site will meet the need for both private and social rented pitches.

The in-combination effects of the allocation of the four sites

The in-combination effect of allocating the four sites is considered to be either positive, or to have no significant effect on the sustainability issues identified in the SA framework. It is noted that three of the four sites (Land off Old Damson Lane; The Haven; and The Warren) are located in the vicinity of Birmingham Airport and this may have a negative in-combination effect on the health and wellbeing of the local Gypsy and Traveller community. However these are all extensions to existing, established sites, so travellers living on these sites may currently experience such effects. Any additional noise generated by development and occupation of these sites potentially affecting neighbouring dwellings would need to be assessed and mitigated as appropriate.

Policy GTS 6 (Detailed Planning Considerations)

Implementation of this policy would have a minor positive effect on the majority of the SA objectives. When applied together, Policy P6 of the Draft Local Plan along with this policy and the government's good practice guidance „Designing Gypsy and Traveller Sites – Good Practice Guide’ provide an appropriate framework for addressing the sustainability issues identified by the SA framework.

Policy GTS 7 (Safeguarding)

Implementation of this policy would have a neutral effect on all of the SA objectives with the exception of SA objective 16 - Housing. The policy was judged to have a significant positive effect on SA objective 16 - Housing. The safeguarding of all allocated authorised Gypsy and Traveller sites and any new sites which gain planning permission would help to

provide for the identified accommodation needs for Gypsies and Travellers in Solihull. Implementation of this policy would also ensure that existing and future Gypsy and Traveller sites remain as such and are not lost to alternative development.

Mitigation

The following recommendations are put forward for consideration in the SA report:

- As part of implementing the strategy, the Council should ensure that family groups are able to remain on sites together, as far as is possible; and that consideration is given to any approach that would increase the need for family groups to have to share sites; and
- In terms of policies GTS 2 and 3, there could potentially be an issue relating to bringing the site forward for development if adequate mitigation cannot be put forward to address flood risk issues associated with the site. In the event that any site should fail to deliver the number of pitches, Policy P6 of the draft Local Plan makes provision for any unmet need to be met through the planning application process. It is recommended that this approach is made clear within the DPD to ensure that an alternative approach can be pursued if this situation arises.

All recommendations included within the interim SA report prepared in July 2012, which accompanied the Preferred Options DPD have been accepted by the Council and implemented within the Submission Draft of the DPD.

Next Steps

This SA Report will be published alongside the Gypsy and Traveller Site Allocations Submission Draft DPD to seek feedback.

Any significant changes to the DPD which are made in the Submission version would be subject to further SA /SEA, and a revised SA report would be prepared to accompany the Submission version of the DPD.

The Council would like as many people as possible to have their say about this document. Please send your response to the Council by 5pm on the 17 May 2013.

How to make comments

You can respond in two ways:

- Using the Gypsy and Traveller Site Allocations DPD Submission Draft response form and returning it to the address given on the form.
- Emailing your comments to: psp@solihull.gov.uk

To find out more about the Gypsy and Traveller Site Allocations DPD you can visit the Council's webpage at solihull.gov.uk/LDF or call 0121 704 6428.