

Gypsy and Traveller Site Allocations Development Plan Document - Submission Draft

Summary of Representations Received

June 2013

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Introduction

This document follows the Chapter order of the Gypsy and Traveller Site Allocations Development Plan Document (DPD) Submission Draft and provides:

- i) List of respondents
- ii) Summaries of all representations received by Chapter/Policy/Paragraph number

Representations have been summarised and are listed in Chapter / Policy number order.

Response Details

22 responses were received by the deadline, with none being received after the deadline.

The respondents have been categorised according to the person / organisation being represented, e.g. if a planning consultant sent in a representation for an individual, then it is categorised as an individual response.

Data Organisation

Responses were received as emails, letters and using the Council's response form. Each respondent has been assigned a Person ID number and their response split into representations according to the Policy / Paragraph. Only the most essential information has been included in the tables below.

The following abbreviations have been used:

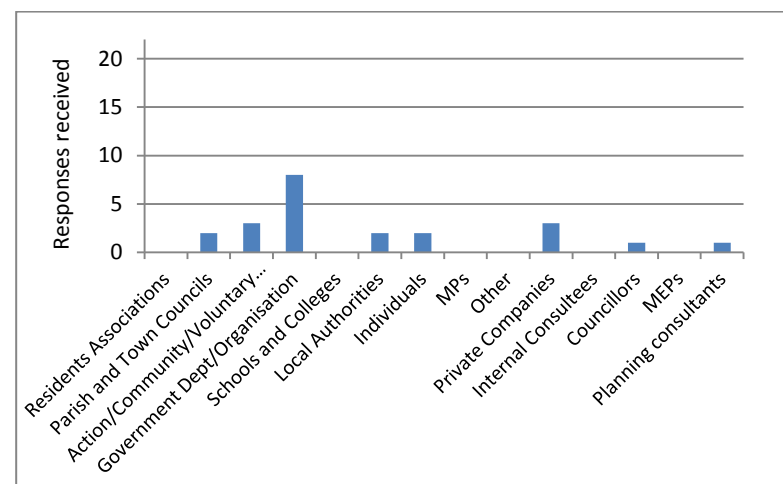
Support / Object:	S = Support	O = Object
Legally Compliant:	Y = Is compliant	N = Not compliant
Sound / Unsound:	S = Sound	U = Unsound
Tests of Soundness*:	PP = Positively prepared	

	J = Justified E = Effective N = Consistent with national policy
Written Representations:	W = Written representations
Examination in Public:	E = Examination in public

** If considered unsound, it is considered to fail these tests of soundness*

*** Where it has not been explicitly stated, it will be assumed the response is treated as a written representation.*

Figure 1 – Number of respondents by category



Every effort has been made to ensure that all responses received have been summarised correctly and incorporated into this document. If you are aware of any errors or omissions, please contact the Spatial Planning Team on 0121 704 6428 or PSP@solihull.gov.uk. Hard copies are also available to view on request.

Category Definitions

Code	
1	Residents Associations
2	Parish and Town Councils
3	Action, Community and Voluntary Groups
4	Government Departments / Organisations / Statutory Undertakers
5	Schools and Colleges
6	Local Authorities
7	Individuals
8	MPs
9	Other
10	Private Companies
11	Internal Consultees
11a	Councillors
12	MEPs
13	Planning consultants

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Personal Information of Representees

Person ID	Category	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation
1	7	Robert Lowe			
2	10		GEO Network Limited		Fisher German
3	4		Network Rail		
4	11a	Councillor Burgess			
5	4		The Coal Authority		
6	4	Rohan Torkildsen	English Heritage		
7	4	Roslyn Deeming	Natural England		
8	2	Heather Badham	Fillongley Parish Council		
9	6	Neville Ball	Walsall MBC		
10	13	Alison Heine	Heine Planning Consultancy		
11	7	Tracy Pedley		Mary Philbin	Central and Cecil Housing Trust
12	4	Stephen Williams	Highways Agency		
13	4	Katherine Burnett	Canal and River Trust		
14	3	Jean Wareing	CPRE Warwickshire		
15	4	Police and Crime Commissioner for West Midlands (PCCWM)		Helen Winkler	Tyler-Parkes Partnership
16	10		Whitbread Group PLC	Benjamin Spratt	Gerald Eve LLP
17	2	Helen Marczak	Dickens Heath Parish Council		
18	4	Jane Field	Environment Agency		
19	6	John Careford	Stratford-on-Avon District Council		
20	3	Roger Yarwood	National Association of Gypsy Liaison Groups and Derbyshire Gypsy Liaison Group		
21	10	Jon Hockley	Birmingham Airport		
22	3	Richard Wheat	Warwickshire Wildlife Trust		

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Representations on Chapter 1 – Introduction and Context

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
10	General	S & O	Not specifically stated but does not consider that the Council has paid proper and due regard to comments made as part of the consultation process.	No comment	No comment	Support that the issue of Gypsy and Traveller accommodation is being addressed but object to the fact that it is not being done alongside mainstream housing. Objects to the fact that in migration is ignored, when it is accepted that for mainstream housing there is a need to accommodate those seeking to reside in this part of the West Midlands.	No comment	E	There are important matters that still need to be resolved.

Representations on Chapter 2 – How the Development Plan has been developed

No specific comments received.

Representations on Chapter 3 – Planning Policy Context

No specific comments received.

Representations on Chapter 4 – Gypsy and Traveller Accommodation Need in Solihull

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
10	4.6.2	O	No comment	No comment	No comment	Level of need should be set to a minimum of 38 pitches until the new site at Old Damson Lane is built and made available	Set level of need to 38 pitches	E	There are important matters that still need to be resolved.

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Representations on Chapter 5 – Challenges, Vision and Objectives

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
22	5.1.2	O		U	N	NPPF states that local authorities should aim to minimise impacts on biodiversity and take a strategic approach to biodiversity protection in their local plans by locating developments on sites with less harmful impacts. The DPD must acknowledge the challenge of meeting Gypsy and Traveller accommodation needs with protection of the Borough's biodiversity. The omission of this challenge, together with the absence of an objective on this matter is considered to be inconsistent with the NPPF.	In order to align this chapter with the NPPF the sub-challenges listed in paragraph 5.1.2 include reference to protecting biodiversity and the natural environment. It will also ensure that challenges in the DPD are consistent with the Solihull Draft Local Plan submission document. Suggested wording: "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."	W	N/A
22	5.3.2	O		U	N	NPPF states that local authorities should aim to minimise impacts on biodiversity and take a strategic approach to biodiversity protection in their local plans by locating developments on sites with less harmful impacts. The DPD must acknowledge the challenge of meeting Gypsy and Traveller accommodation needs with protection of the Borough's biodiversity. There are no objectives in DPD that require decisions on Gypsy and Traveller sites to take account of their impacts on biodiversity and without such an objective there is no context for including	The sub-objectives in paragraph 5.3.2 should include some reference to protection of biodiversity and the natural environment. This would ensure 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	W	N/A

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						biodiversity or the natural environment in site design and site selection policies.	principles of the NPPF and the objectives and policies in the Draft Local Plan submission document.		
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Representations on Chapter 6 – Strategy

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
15	General	No comment	No comment	No comment	No comment	Recent planning permission granted for 7 pitches at Old Damson Lane did not seek formal comments from the PCCWM. The Government's Good Practice Guide, as referred to in the DPD suggests consultation with the police on site security and other issues.	The DPD should explicitly state that there is a requirement to consult with the PCCWM to consider site security and other issues.	No comment	No comment

Representations on Policy GTS 1

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
15	GTS 1	O		U	N	Welcome the principle of the introduction of a policy on temporary stopping places. However, object to the omission of an explicit reference to the need to consult with the PCCWM and object to the lack of reference to matters of security and safety or mitigation measures that may be required. It does not meet the requirements in the NPPF and Planning Policy for Traveller sites in this regard and it is not sufficient to rely on the Government's Good Practice guide.	Add the following points: <ul style="list-style-type: none"> • <i>Any unacceptable social issues arising from proximity to established Gypsy and Traveller communities or the wider communities can be mitigated.</i> • <i>The design includes measures to promote community safety and social cohesion such as through natural surveillance;... Proposals will expect to have regard to advice from the Police and Crime Commissioner for West Midlands.</i> 	Not stated	Not stated
22	GTS 1	S		S		Support the criteria in GTS 1, in particular the 5th bullet point which ensures the DPD reinforces protection for key biodiversity assets.		W	N/A

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Representations on Chapter 7 – Site Allocations

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
10	General	O	No comment	No comment	No comment	Sites at Damson Lane, The Warren and the Haven should not be allocated until it can be demonstrated that these sites have the capacity for additional pitches and are suitable for development in accordance with Policy GTS 6. Until and unless such studies are undertaken, it cannot be concluded that these sites are deliverable or capable of providing the number of pitches indicated.	No comment	E	There are important matters that still need to be resolved.
11	General	O	No comment	No comment	No comment	Objection to the site at Canal View, Salter Street being excluded from the Council's final list of sites. The owner considers that the planning issues with the neighbouring Gypsy and Traveller site has unfairly prejudiced her site. No site extension is being promoted at Canal View; only the addition of 2 additional pitches on the existing site to accommodate the family's future needs. There would be 3 pitches in total - the same number as permitted on the neighbouring site. There have been no issues at this site and the family are well integrated into the local community having resided on the existing site for 25 years.	Suggest that the Haven allocation of 12 pitches be reduced by 2 and that the site at Canal View is included for 2 pitches to accommodate this family's future needs.	Not stated	Not stated

Representations on Policy GTS 2 – Old Damson Lane

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
6	GTS 2	No comment	No comment	No comment	No comment	Need to note the impact of an extended site on the setting of the Castle Hills Farmhouse (a grade II listed building) and the possible impact on potential associated undesignated	No comment	W	No comment

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						archaeology of importance. Need to demonstrate an understanding of the relationship of the Old Damson Lane site to the significance of the Castle Hills Farmhouse and consider whether there may be any archaeological relationship that needs to be addressed.			
7	GTS 2	S	No comment	No comment	No comment	Welcome the provision in GTS 2 which includes provision for the protection of Local Wildlife Sites which are in close proximity to the proposed Gypsy and Traveller site	No comment	W	No comment
10	GTS 2	O	No comment	No comment	No comment	The site should not be allocated until and unless the Council is satisfied: i) there is no potential impact on any protected species at the adjacent Local Wildlife Site ii) access is safe given the dangerous crossing of the nearby Damson Parkway iii) noise assessment for Birmingham airport having regard to runway extensions.	No comment	E	There are important matters that still need to be resolved.
18	GTS 2	O		U	J	There has been no additional flood risk assessment undertaken to support the inclusion of GTS2. The site area has been revised to include an area which extends to the eastern end of the site next to the Low Brook. The EA considers the allocation of this site would be unsound due to the lack of supporting evidence to confirm that it is possible to deliver the proposed level of development, and be in line with national policy. A Level 2 Strategic Flood Risk Assessment should be undertaken to ascertain the extent of flood risk across the site prior to the site's allocation. It is insufficient to require a flood risk assessment post allocation as the whole site may be subject to too high a level of flood risk where no pitches on this site are	No comment	Not stated	N/A

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						suitable, regardless of layout. In the absence of a level 2 SFRA, Policy GTS2 should be removed and replaced with an alternative site.			
22	GTS 2	S		S		No objection to the site as a strategic allocation, but stress the importance of Castle Hill Farm Meadows Local Wildlife site. The importance of Low Brook should be emphasised and recommends that the policy includes a requirement to buffer the Low Brook as part of the Green Infrastructure for the site. However, the policy is not unsound.	To strengthen the sustainability of the proposals ensure that the impacts on Low Brook are also taken into consideration. Set a requirement for a minimum buffer along Low Brook as part of the green infrastructure / soft landscaping proposals for the site.	W	N/A

Representations on Policy GTS 3 – The Warren

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
7	GTS 3	S	No comment	No comment	No comment	Welcome the provision in GTS 3 which includes provision for the protection of Local Wildlife Sites which are in close proximity to the proposed Gypsy and Traveller site	No comment	W	No comment
10	GTS 3	O	No comment	No comment	No comment	Unclear how this site is considered large enough for five pitches, given the constraint of trees protected by a TPO. The site should not be allocated until and unless the Council is satisfied: a) there will be no potential harmful impact on any protected species at the adjacent Local Wildlife Site. b) the additional pitches can be accommodated around the TPO without placing pressure on the need to remove protected trees due to danger of branch fall on caravans.	No comment	E	There are important matters that still need to be resolved.
22	GTS 3	S		S		No objection to the site as an allocation but	No comment	W	N/A

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						wish to outline the important reference to the Bickenhill Plantation Local Wildlife Site. Support for the inclusion of the statement in the policy requiring proposals to demonstrate there will be no impact on the LWS.			
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Representations on Policy GTS 4 – The Uplands

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
1	GTS 4	O	No comment	No comment	No comment	Objects to the Uplands and Salter Street sites because: <ul style="list-style-type: none"> • They are on Green Belt land • Sites have a history of non-compliance with the planning system and further illegal development is likely to occur if sites are approved. • Families on site are known to own properties in the local area, so allocation of pitches to them is unnecessary. 	No comment	W	No comment
4	GTS 4	S	No comment	No comment	No comment	Happy to support approval of existing caravans. Not happy to support an extension.	No comment	W	No comment
14	GTS 4	O	No comment	No comment	No comment	<ul style="list-style-type: none"> • Object to the site at the Uplands as it is in the Green Belt which Government policy seeks to protect from inappropriate development. Development in this area will erode the nature of the green space between Dickens Heath and Shirley and reduce the village identity of Dickens Heath. • The site is an unauthorised development, still subject to enforcement action and if it is included sets a dangerous precedent. • The site could accommodate more pitches than the 3 identified and a planning application has been submitted for 4 pitches. Despite a restriction on the number a strong case for 	No comment	Not stated	No comment

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						expansion could be made and upheld at appeal by an Inspector. • There are no special circumstances for such development to take place in the Green Belt.			
17	GTS 4	O	No comment	No comment	No comment	<ul style="list-style-type: none"> • Object to the site at the Uplands as it is was not suggested as a suitable site in the LDF of July August 2011. The area already has its fair share of traveller sites nearby and it is only included to reduce the number of unauthorised sites in the Borough. • The site is in the Green Belt which Government policy seeks to protect from inappropriate development. Development in this area will erode the nature of the green space between Dickens Heath and Shirley and reduce the village identity of Dickens Heath. • The site is an unauthorised development, still subject to enforcement action and if it is included sets a dangerous precedent. • The site could accommodate more pitches than the 3 identified and a planning application has been submitted for 4 pitches. Despite a restriction on the number a strong case for expansion could be made and upheld at appeal by an Inspector. • There are no special circumstances for such development to take place in the Green Belt. 	No comment	Not stated	No comment

Representations on Policy GTS 5 – The Haven

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
2	GTS 5	No comment	No comment	No comment	No comment	GEO apparatus may be affected by proposals at the Haven.	No comment	W	No comment
7	GTS 5	S	No	No	No	Welcome the provision in GTS 5 which includes	No comment	W	No comment

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			comment	comment	comment	provision for the protection of Local Wildlife Sites which are in close proximity to the proposed Gypsy and Traveller site			
10	GTS 5	O	No comment	No comment	No comment	The existing Haven site is inappropriate, overcrowded, poorly laid out and directly under the flight path for landing planes at Birmingham Airport. No extension should be permitted until and unless living conditions are improved. The site should not be allocated until and unless: a) a noise report is commissioned to show noise from aircraft would not result in unacceptable living conditions for site residents. b) it can be shown there would be no harmful impact on protected species at the nearby Local Wildlife site. Other sites should be made available as part of a contingency in case sites identified are not made available.	No comment	E	There are important matters that still need to be resolved.
18	GTS 5	No comment	No comment	No comment	No comment	SMBC is responsible for maintaining the record of historic landfills in its area and discussions have been held between SMBC and the Environment Agency about the possibility that the Haven is situated on a historic landfill site. Clarification from SMBC required as to the status of the site and any mitigation measures that may be necessary should be put in place accordingly.	No comment	Not stated	No comment
21	GTS 5	O		U	N	Serious concerns over the allocation of this site due to proximity of Birmingham Airport. The planned and approved growth of the airport will over time, potentially increase the noise impact on this site. The NPPF seeks to prevent new and existing development being put at risk from noise pollution, amongst other things.	No comment	Not stated	No comment

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						The allocation is not consistent with draft local plan policy P14 which seeks to minimise the adverse impacts of noise.			
22	GTS 5	S		S		No objection to the site as an allocation but wish to outline the important reference to the Castle Hill Farm Meadows Local Wildlife Site. Support for the inclusion of the statement in the policy requiring proposals to demonstrate there will be no impact on the LWS.	No comment	W	N/A

Representations on Chapter 8 – Detailed Planning Considerations and Safeguarding

Representations on Policy GTS 6 – Detailed Planning Considerations

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
10	GTS 6	O	No comment	No comment	No comment	GTS should not require private sites to have regard to the Good Practice Guide, which is designed for socially provided sites.	No comment	E	There are important issues that still need to be resolved
15	GTS 6	O		U	N	GTS 6 does not include a specific reference to the need to design out crime. It is not sufficient to rely on the need for proposals to have regard to the Government's Good Practice Guide.	Revised policy should read: "...Be well designed and laid out respecting secured by design, and in particular by ensuring that..." "It is recommended that pre-application advice is sought from Solihull MBC and the Police and Crime Commissioner for West Midlands on proposals for Gypsy and Traveller related development."	Not stated	No comment
22	GTS 6	O		U	N	If the DPD is to comply with NPPF principles to protect and enhance the natural and local environment, this policy should take full account of the opportunities to integrate biodiversity into all new Gypsy and Traveller sites by promoting green infrastructure planning and designing in biodiversity as an integral part of high quality sites.	GTS 6 should be expanded to promote biodiversity enhancements within a site.	W	N/A

Representations to Policy GTS 7 – Safeguarding

No specific comments received.

Representations on Chapter 9 – Delivery and Monitoring

No specific comments received.

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Representations on General and Miscellaneous Issues

Person ID	Policy / Para	Support /Object	Legally Compliant	Sound or Unsound	Test of soundness	Representation	Suggested wording	Examination or Written Reps	Reason for Examination
1	General	O	No comment	No comment	No comment	Object to the DPD in general because it will result in an uneven distribution of traveller sites within SMBC.	No comment	W	No comment
7	General	S	No comment	No comment	No comment	Generally satisfied that the document has given full consideration to the natural environment.	No comment	W	No comment
8	General	S	No comment	No comment	No comment	Support for the plans and pleased that SMBC are allocating provision for this sector of the community.	No comment	W	No comment
9	General	S	No comment	No comment	No comment	Support for the draft document. The number of pitches proposed accords with evidence in the 2012 GTAA.	No comment	W	No comment
10	General	O	Concern that previous representations have not been taken into consideration	U	PP, J, N	Not positively prepared in so far as: i) No regard to the 2012 GTAA which calls for further studies for showperson sites. Unclear how the Duty to Cooperate has sought to address showpeople accommodation in the West Midlands effectively. ii) Assessment of need fails to properly consider overcrowding at the Haven. Not justified and effective in so far as: i) The Council is more concerned with meeting targets than ensuring good quality sites are provided. ii) Failure to provide choice in location of sites and for small family sites. iii) The plan is not flexible and offers no fall back should one or more sites fail to deliver the number of pitches indicated.	Need: • Level of need should be set to a minimum of 38 pitches until the new site at Old Damson Lane is built and made available. Unclear who will be able to afford to purchase and provide this site. • Need assessment should have regard to quality and not just quantity of caravans of existing sites. The Haven is overcrowded. Site identification: • The plan should make clear what non-green belt land was considered for Travellers and why land identified for housing	E	There are important matters that still need to be resolved.

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					<p>iv) The plan is not flexible as need from 2017 is all planned to be met on a single site which is not suitable. GTS5 indicates this site is in Phase 2 (but up to 2017, not 2017 - 2027).</p> <p>v) The plan fails to identify a site to meet transit need.</p> <p>vi) The plan relies on an unsuitable site at the Haven to meet need.</p> <p>vii) There is no certainty identified sites will be delivered given issues with possible impact on TPO land or possible harm to protected species in Local Wildlife sites.</p> <p>viii) Unclear if Old Damson Lane (7 plot site) is to be made available as a rural exception site in accordance with Policy D PPTS. Not consistent with National Policy in so far as:</p> <p>i) Alternatives to Green Belt sites do not appear to have been considered and unclear whether consideration given to accommodating needs as a proportion of large sites allocations.</p> <p>ii) No consideration of para 15 PPTS and the need to alter Green Belt boundaries to make provision.</p> <p>iii) No consideration of specific, developable sites from 2017.</p> <p>iv) The Haven is not sustainable environmentally and contrary to guidance in para 11 (e) PPTS.</p> <p>v) GTS6 should not require private sites to have regard to Good Practice Guide which is designed for socially provided sites.</p> <p>Other points:</p> <ul style="list-style-type: none"> • Support for the provision of a transit site. 	<p>was not considered as part of the call for sites.</p> <ul style="list-style-type: none"> • Need to identify specific sites or at least broad locations for years 6 onwards. <p>Transit Site:</p> <ul style="list-style-type: none"> • Suggest that the Haven should be used as a transit site. 		
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						<ul style="list-style-type: none"> • No allowance for in migration. Assessment fails to make allowance for those wanting to live in the district due to shortage of sites. • Unclear why a suitable site has not been identified for transit provision. Unclear what timetable is to be followed for finding a site and when transit provision will be made. • The needs of travelling showpeople have not been assessed. Just because there are no travelling showpeople in the Borough is not a sound planning objective. The GTAA suggested that further work may be required across local authority boundaries and there is no evidence that this has been done. • The plan provides no flexibility if sites fail to come forward, the number of pitches cannot be delivered or needs increase. • Little choice to those seeking consent for small, private family sites. Only option is a private site which may not be an affordable option and would result in a site that is larger than CLG good practice guidance suggests. • Methodology for site allocations appears reasonable, application of the methodology not entirely clear. Little evidence that the possible harm to the specific objectives of special designations has been looked at. There appears to be no consideration of other land, including Council owned land in the Borough. • No consideration of removing land from the Green Belt. 			
12	General	S	No comment	No comment	No comment	The Highways Agency is satisfied that the proposed sites are unlikely to have a	No comment	Not stated	No comment

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						detrimental impact on the operation of the Strategic Road Network. Therefore there is no objection to the proposals.			
15	App 1	No comment	No comment	No comment	No comment	Appendix 1 should be amended to include consideration of the social suitability of a potential site in terms of whether it is possible to create a safe environment where crime and fear of crime, do not undermine quality of life or community cohesion. Without this reference, the DPD does not fully comply with the requirements of national planning policy. The DPD does not adequately address the need to create safe and accessible environments where crime and disorder and the fear of crime, do not undermine quality of life or community cohesion.	No comment	Not stated	No comment
16	General	No comment	No comment	No comment	No comment	Concern that the location of sites may have an impact on Whitbread Group's restaurants and hotels. Detailed responses will be made when planning applications are submitted.	No comment	Not stated	No comment
19	General	No comment	No comment	No comment	No comment	No comments on the document other than to stress that the Stratford district boundary with Solihull is in the West Midlands Green Belt where Stratford's proposed policy approach would not normally permit the provision of Gypsy and Traveller sites.	No comment	Not stated	No comment
20	General	S	No comment	No comment	No comment	Generally support the document but consider that the policy text should	No comment	Not stated	No comment

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						recognise that other sites may come forward through planning applications and that such applications will be considered against local plan policies. The allocations in the document should not be seen as a limit on provision and that future reviews of need will be required and may determine the need for additional provision.			
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