

Solihull Metropolitan Borough Council Sustainability Appraisal of the Gypsies and Travellers DPD

Interim SA Report May 2012

Prepared for





Revision Schedule

Solihull Borough Council Sustainability Appraisal of the Gypsies and Travellers DPD May 2011

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1 Introduction

- 1.1.1 This document is an interim report of Sustainability Appraisal (SA) that is being undertaken alongside development of the Gypsy and Traveller Site Allocations Development Plan Document (DPD) being prepared by Solihull Metropolitan Borough Council ("the Council'). URS Scott Wilson was commissioned to work alongside officers from the Council to prepare this Report.
- 1.1.2 This Interim SA Report documents the appraisal of the Gypsy and Traveller Site Allocations DPD "Options Paper. ¹ This options paper was published for consultation between 6 July and 31 August 2011. The SA findings and recommendations set out within this report will be taken into account by the Council, alongside consultation responses, when preparing the "Submission Draft' of the DPD, which will itself then be published for consultation.

1.2 Sustainability Appraisal

- 1.2.1 SA is a process by which the environmental, social and economic effects of a strategic action (a plan or a programme) are considered prior to finalisation of the plan. The purpose of identifying likely effects in advance is that adverse effects can be minimised and beneficial effects can be enhanced.
- 1.2.2 In the case of DPDs, it is a legal requirement that SA is undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive. The objective of SEA is ,to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans [...] with a view to promoting sustainable development' (SEA Directive, Article 1).

1.3 The SA Report

1.3.1 A key requirement of the SEA Directive is that:

"Where an assessment is required by this Directive, an environmental report should be prepared... identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives"

1.3.2 **Table 1-1** sets out the required content of the "environmental report' as defined in the SEA Directive. The required content will be provided within the Final SA Report, which will be published for consultation alongside the Submission Draft of the DPD. This "Interim' SA Report does not seek to provide all required content.

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See http://www.solihull.gov.uk/Attachments/DPD_GT_FINAL_for_publication.pdf (accessed October 2011)

² Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment; as transposed by the Environmental Assessment of Plans and Programmes Regulations 2004



Table 1-1: Meeting the reporting requirements of the SEA Directive

Table 1-1. Meeting the reporting requirements of the SEA Directive							
Requirement	Where Covered						
An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	This will be summarised in the Final SA Report published alongside the Submission Draft DPD						
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	This will be summarised in the Final SA Report published alongside the Submission Draft DPD						
The environmental characteristics of areas likely to be significantly affected	This will be summarised in the Final SA Report published alongside the Submission Draft DPD						
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Summarised in Chapters 3 to 13 of this Interim SA Report. This information will also be summarised in the Final SA Report published alongside the Submission Draft DPD						
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	This will be summarised in the Final SA Report published alongside the Submission Draft DPD.						
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Appraisal findings, as they relate to options and draft policy approaches, are presented in Chapter 4 and within Appendix III of this Interim SA Report. Appraisal findings will also be set out within the Final SA Report published alongside the Submission Draft DPD.						
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Recommendations are presented in Chapter 4 of this Interim SA Report Recommendations will also be set out within the Final SA Report published alongside the Submission Draft DPD.						
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with will be presented within the Final SA Report published alongside the Submission Draft DPD.						



Requirement	Where Covered
A description of the measures envisaged concerning monitoring in accordance with Article 10	Monitoring recommendations will be presented within the Final SA Report published alongside the Submission Draft DPD.
A non-technical summary of the information provided under the above headings	A non-technical summary will be presented within Final SA Report published alongside the Submission Draft DPD.

1.4 Structure of this Interim SA Report

- 1.4.1 The remainder of this report is structured as follows:
 - Chapter 2 The plan-development / SA process.
 - Chapter 3 The approach taken to SA Stages B and C.
 - Chapter 4 The evidence base that that has informed the appraisal.
 - Chapter 4 The appraisal findings and recommendations.
 - Chapter 5 The conclusions.



2 SA Process

2.1 Introduction

2.1.1 Government Guidance advocates a five-stage approach to undertaking SA (see Figure 2-1).

Figure 2-1: The five stage approach to SA

Stage A

- Assemble the relevant evidence base
- Use evidence to develop the SA framework
- In doing so determine the scope of the SA

Scoping Report

Stage B

- Assess plan options and preferred options / draft policies drawing on Stage A
- Make recommendations to minimise any negative impacts and enhance positive ones
- Propose measures to **monitor** the significant effects of the preferred approach.

Stage C

• Report on SA findings



Final SA Report published alongside Draft Plan

Stage D

 Consult stakeholders on the plan options / preferred options alongside SA findings

Stage E

 Monitor the implementation of the plan post adoption (including effects predicted by the SA)



Stage A

- 2.1.2 The purpose of Stage A is to define the scope of the assessment. A key step is the production of a Scoping Report developed alongside public consultation. Stage A was begun in 2008, with a Scoping Report published for consultation and subsequently finalised (July 2008). Rather than being focused on the Gypsy and Traveller DPD, this Scoping Report was developed with the aim of guiding the Solihull Local Development Framework *in general*. It provides a helpful a methodological "framework' for this appraisal (essentially a set of SA objectives, sub-objectives and issues for consideration). It has been necessary to supplement the information set out within the 2008 Scoping Report to reflect:
 - Changes to the policy framework since 2008, let to a need to revise the SA objectives. The
 updated SA Objectives are presented in Box 2-1 and the "evolution" of the SA objectives
 since 2008 is discussed further in **Appendix I**.
 - The evidence gathered specific to Gypsy and Travellers in Solihull. Findings of this supplementary scoping work are presented within Chapter 3 of this report.

Box 2-1: SA objectives and sub-objectives (2011)

- 1. To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups
- 2. To reduce the number of people with access difficulties to employment, education and training opportunities
- 3. To 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.
 - To use brownfield sites where appropriate where 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
 - To deliver quantified reductions in greenhouse gas emissions by 2020 that contribute to the 34% reduction target
 - To encourage reduced energy use, use of distributive energy systems and renewable energy
- To assist in the adaptation businesses need to become or resource efficient and also to deliver more sustainable products and services better equipped to a changing market place caused by climate change
- 7. Manage, maintain and where necessary improve the drainage network to reduce the economic losses from flooding
- 8. To ensure that development provides for adaptation to urban heating and to the effects of high winds
- 9. To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species



- 10. To 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. To facilitate the delivery and enhance the quality of areas providing green infrastructure
- 12. To enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects
- 13. To deliver improvements in townscape and enhance local distinctiveness
- 14. Minimise air, soil, water, light and noise pollution
 - To continue to deliver reductions in particulate and nitrogen dioxide levels
 - To manage drainage network to ensure no detriment to surface water quality
 - To reduce the intrusion of urban and highway lighting
 - To deliver reductions in road traffic noise focusing upon those areas identified as First Priority Locations
 - To conserve soils thereby supporting other objectives
- 15. To 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. To 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

Stage B and C

- 2.1.3 This Interim SA Report focuses on **Stage B** of the SA process. Options and draft policy approaches set out within the Gypsy and Travellers Options paper have been appraised against the SA Objectives, and recommendations have been made to enhance beneficial effects and minimise adverse ones. SA findings and recommendations have been made available to the Council, and will be taken on-board as they prepare the Draft Submission Version of the DPD.
- 2.1.4 The Submission Draft of the DPD will also be subject to appraisal (i.e. further **Stage B**), with appraisal findings and recommendations presented within a Final SA Report document (hence meeting the requirement of **Stage C**). At this stage, suggestions will also be made for monitoring likely significant effects.

Stage D

2.1.5 The Final SA Report will be published for consultation alongside the Submission Draft of the DPD.



Stage E

2.1.6 At plan adoption, a "statement' will be published setting out: How the findings and recommendations set out within the Final SA Report, as well as "wider opinions' gathered through consultation, have been taken into account and reflected in the final plan. The adoption statement will also present the Council's preferred approach to monitoring.



3 Evidence-base

3.1.1 The primary source of evidence to inform the appraisal is the 2008 SA Scoping Report³. This document identifies a range of sustainability issues that might potentially be affected by the policies set out within the Gypsy and Travellers 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.

3.2 Planning for Traveller Sites

- 3.2.1 In April 2011, the CLG has issued a draft document on Planning for Traveller Sites⁴ that notes that the Government's initial intention was for the final guidance to replace Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Show-people. However, the document is now not likely to be finalised, given that the new Planning Policy Statement on Planning for Traveller Sites will be incorporated into the Government's forthcoming National Planning Policy Framework which will replace national planning policy documents.
- 3.2.2 Planning for Traveller Sites seeks to ensure that discrimination and existing poor social outcomes among traveller communities are addressed. The Government is particularly concerned about poor health and educational outcomes, noting that:
 - Gypsies and Travellers are 12 per cent more likely to have a long-term illness compared to comparable members of the settled community;
 - Gypsy and Traveller mothers are 20 times more likely to experience the death of a child than the rest of the population; and
 - School attendance and educational attainment of Gypsy and Traveller pupils is considerably lower than their peers at every key stage.
- 3.2.3 The document notes that inequalities faced by Gypsies and Travellers include:
 - · Poor health outcomes;
 - Poor performance at school;
 - High unemployment and lack of engagement with employment support;
 - Unmet accommodation needs (insufficient appropriate authorised public site provision and difficulties settling into bricks and mortar accommodation);
 - Lack of access to financial products and services (such as insurance, loans and bank accounts); and
 - · Hate crime and discrimination.
- 3.2.4 At the same time, the Government wants to tackle unauthorised development in all its forms. It is clear that it will not tolerate abuse of the planning system by a small minority of travellers, who set up unauthorised developments. The document notes that unauthorised developments

http://www.communities.gov.uk/publications/planningandbuilding/travellersitesconsultation (accessed 08/11)

³ Solihull Metropolitan Borough Council 2008: Sustainability Appraisal Scoping Report

⁴ CLG (2011) Planning for traveller sites: Consultation [online] available @



tend to create tension, undermine community cohesion and create resentment against the overwhelming majority of law-abiding travellers who do not live on unauthorised sites.

- 3.2.5 Protecting Green Belt from development is given particular emphasis, with the document highlighting that, between 2006 and 2009, 60 per cent of planning appeals for traveller development in the Green Belt were allowed. This is compared to just 19 per cent over the same period for minor housing appeals. The document proposes to clarify that applications from travellers for development on Green Belt should be dealt with in exactly the same way as applications from members of the settled community.
- 3.2.6 The document describes the following as key sustainability objectives:
 - Peaceful and integrated co-existence between the site and the local community;
 - Easier access to health services;
 - Ensuring that children can attend school on a regular basis;
 - A settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment;
 - Not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
 - Recognising the extent to which traditional lifestyles (whereby travellers live and work from the same location thereby omitting travel to work journeys) can contribute to sustainability.
- 3.2.7 Two further points made are that:
 - In terms of sites in rural areas, the document emphasises that the scale of such sites should not dominate the nearest settled community; and
 - Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses (having regard to the safety and amenity of the occupants and neighbouring residents) or separate sites for residential and for business purposes in close proximity.
- 3.3 Gypsy and Traveller Accommodation Assessment, 2008⁵

Characteristics of the local Gypsy and Traveller population

- 3.3.2 The main characteristics of the local Gypsy and Traveller population across Birmingham/ Coventry/Solihull (the study area) are:
 - There are clear ethnic differences within the Gypsy and Traveller communities between Romany Gypsies and Irish Travellers. While mixed sites can work (as evidenced by The Haven in Solihull), segregated sites are more common and apparently more acceptable to most Gypsies and Travellers. New provision across the study area should cater for both groups.
 - The most common household size on sites is 1 and 2 persons which together make up more than half of all households. For Gypsies and Travellers living in "bricks and mortar" housing,

⁵ Joint Gypsy and Traveller Accommodation Assessment (University of Birmingham, 2008) [online] available @ http://www.solihull.gov.uk/ldf/15498.htm (accessed 08/11)



the spread is considerably wider. A notable feature of the distribution is the number of single person households comprising people in their 30s, 40s and 50s. There are also some variations in average household size by type of site:

- Private site 2.5 people;
- Unauthorised sites 3.5 people;
- Local authority site 4.3 people;
- Levels of ill health are relatively low, but serious for a minority of families;
- Families retain nomadic or semi-nomadic lifestyles to differing degrees.

Current Site Provision

3.3.3 Current site provision can be summarised as follows:

- There are estimated to be just under 300 Gypsy and Traveller households across the Birmingham/Coventry/Solihull, two-thirds of whom live in bricks and mortar housing, and a third on sites. While there is no evidence at present of a widespread desire to move from housing to sites, this could change if good quality, safe sites become a practical reality.
- The most recent count⁶ records 72 caravans occupied by Gypsies and Travellers on 11 sites in Solihull see **Table 3-1**. Of the eleven sites 7 have full planning permission; the remainder have either temporary permission or are unauthorised sites.

Table 3-1: Gypsies and Travellers in Solihull at May July 2011

	Number of sites	Number of caravans on sites	Number of pitches	
Sites with full planning permission	7	45 Caravans	49 Pitches	
Sites with temporary planning permission	1	3 Caravans	1 Pitch	
unauthorised sites	3 (plus 1 unauthorised extension of an existing authorised site)	20 Caravans (plus 4 caravans on the unauthorised extension of an existing authorised site)	14 Pitches	

• The majority of occupied authorised provision within Solihull is privately owned by Gypsies and Travellers, mainly taking the form of sites owned and occupied by extended families. The main exceptions to this are the site at Bickenhill (The Haven), which is a private site providing pitches for rent, and land at Damson Lane which is Council owned land occupied by an extended family of Travellers, essentially operating as a private family site. There are no Local Authority sites in Solihull and local authority sites in Birmingham and Coventry are

⁶ Solihull Bi-annual Caravan Count July 2011



both under occupied and both face more or less serious management problems linked to current residents. The under occupation of social rented sites is unusual compared with other conurbation areas.

- 79% of respondents on sites in the Birmingham, Coventry and Solihull study area had been there for 5 years or longer, compared with 18% of those in housing.
- When asked about specific problems affecting their site, answers were:
 - Nearness to railway or airport (46%);
 - Nearness to busy roads (12%);
 - Nearness to rubbish tip/sewage works/pylons (3%);
 - Flooding or poor drainage (3%);
 - Nearness to railway or airport (3%); and
 - Nearness to industrial sites.
- Trouble on the site and harassment by other residents was the main reason given for leaving
 the last site lived on. While this sort of thing happens, there is likely to be a continuing
 movement off sites, including into housing until the supply of safe sites increases.

Meeting accommodation needs

- 3.3.4 The 2008 GTAA identified a need for 17 new pitches in Solihull by 2012 (to address existing need) and a further 9 between 2012 and 2017 (to address family increases). In Solihull existing need was identified as arising from all sources, including unauthorised sites.
- 3.3.5 The GTAA emphasises that there is a strong preference for family-owned small sites; but that not all families will be able to afford the ownership of land, and so there is likely to be a continuing need for social rented sites provided by either local authorities or Registered Social Landlords. The GTAA highlights that local planning authorities should seek to make it as simple as possible for Gypsies and Travellers to get planning permission on their own sites in order to meet aspirations. In the social rented sector, sensitive allocation policies should ensure that Gypsies and Travellers are not isolated from others of their community. The ability to live in close proximity to family is extremely important.
- 3.3.6 Respondents stated the following in terms of preferred site ownership:
 - Site owned privately (not family) 33%;
 - Family owned site on own land 28%;
 - Site owned by a Council 17%;
 - Doesn't matter 17%.
- 3.3.7 The GTAA notes that these figures under-represent the actual preference for family owned sites.
- 3.3.8 Respondents were also asked to identify the priority factors that determine the suitability of a site. The order was:
 - · Near to family;
 - · Good road access;



- Near green spaces/countryside;
- Friendly neighbours;
- Near health services;
- Near schools;
- Near shops;
- Where there is work.
- 3.3.9 The list suggests a desire for access to services and integration with the community, while being near to the countryside and with an over-riding concern for being near to family. Further options not thought important by any respondents to the survey were:
 - Away from the settled community;
 - · On the outskirts; and
 - · Close to housing.
- 3.3.10 Since publication of the 2008 GTAA of the 17 pitches required between 2007 and 2012, 12 pitches have been granted planning permission, leaving a shortfall of 5 pitches. A further 9 would then also need to be provided to meet need between 2012 and 2017 as identified in the GTAA. At present, this would result in a total of 14 pitches to be provided to 2017. However, in order to ensure that the Gypsy and Traveller Development Plan Document is based on up to date evidence, at the time of writing, the existing GTAA is being updated to determine Solihull's pitch requirement for the period beyond 2012.

3.4 A Draft Strategy for Gypsies and Travellers in Solihull

- 3.4.1 Rather than focusing on the provision of accommodation, the Borough's draft Strategy for Gypsies & Travellers in Solihull⁷ focuses on service delivery. In particular, it focuses on:
 - Enabling the improvement of service delivery;
 - Ensuring service delivery can be varied to make it accessible to Gypsies and Travellers; and
 - Increasing awareness of services amongst Gypsies and Travellers.
- 3.4.2 Although, in many respects, the draft strategy is of limited relevance to the Site Allocations DPD, it does highlight some important issues relating to the local Gypsy and Traveller population. These issues have been identified through collaboration with Central and Cecil Housing Trust (CCHT), a not for profit organisation that provides a "floating' support service to Gypsies and Travellers within the Solihull area focusing on: Developing independent living skills; Assistance on gaining access to other services; Helping to ensure accommodation is safe and secure; and Managing finances and benefit claims.

Solihull Metropolitan Borough Council, 2010: "A Strategy for Gypsies and Travellers in Solihull', May 2010.



3.4.3 The draft Strategy highlights that:

- Where Gypsies and Travellers are able to live on authorised, well managed sites and can
 access services, they are likely to enjoy improved outcomes in terms of health, education,
 and other quality of life measures. This is also likely to benefit the relationship between
 Gypsies and Travellers and the rest of the community.
- The advice from CCHT is that the take up of services by Gypsies and Travellers in Solihull is generally good. This is partly due to the settled nature of the majority of Solihull's Gypsy and Traveller community. This assessment may not apply to those who are less settled or who are passing through the Borough.
- CCHT have advised that in Solihull, most if not all Gypsies and Travellers have a GP and "all those who want a dentist have one".
- CCHT advise that there are issues in terms of Gypsies and Travellers not accessing mental health support and they consider that there is a higher level of depression within the Gypsy and Traveller community, compared to the general population. This would concur with the national picture.



4 Appraisal Methodology

- 4.1.1 The approach to the appraisal has involved considering each option and draft policy approach in terms of each SA Objective, predicting the effects that would result from option / draft policy approach implementation and evaluating the significance of effects taking account of the current situation (as understood from the available evidence) as well as:
 - The magnitude and spatial extent of the effects;
 - The probability, duration, frequency and reversibility of the effects;
 - The cumulative nature of the effects; and
 - The potential for effects to valued or vulnerable areas.
- 4.1.2 To aid consistency a sustainability assessment tool has been used that records the reasons for the analyst's evaluation of significance. This provides an audit trail against which the findings can be checked. Use of the tool involves the analyst answering a series of criteria based questions for each "predicted effect". The tool then automatically calculates an overall level of significance. The automated assignment of significance via rule-based criteria can be manually overridden by the assessor if the need arises, although this requires justification and agreement by the project director. **Appendix II** presents the "rules" applied by the tool.
- 4.1.3 Although not taken into account by the tool when calculating significance, the appraisal has also considered the potential for options / draft policy approaches to impact specifically on sensitive locations within the Borough (The North Solihull Regeneration Area, the urban area and the rural area) and also the potential for options / draft policy approaches to impact specifically on particular groups within society (i.e. groups defined by ethnicity / race, gender, disability and age).



5 Appraisal Findings

5.1 Introduction

- 5.1.1 This chapter presents the appraisal of the Gypsy and Traveller Site Allocations DPD "Options Paper". In particular, this chapter presents the appraisal of:
 - Options for "the approach to meeting need";
 - The draft policy approach for Gypsy and Traveller related development; and
 - The draft policy approach to addressing "tenure'.
- 5.1.2 For the set of options, and each of the draft policy approaches, the chapter sets out a summary of the forecast effects against the sustainability framework together with a perspective on the uncertainties associated with implementation as well as recommendations for moving forward.
- 5.1.3 Detailed appraisal findings are presented in **Appendix III**.

5.2 Options for "the approach to meeting need"

Introduction

5.2.1 This section presents a summary of the appraisal of the options presented in the Gypsy and Traveller Site Allocations DPD Options Paper for "the approach to meeting need". The aim of the appraisal is to establish the sustainability performance of each of the options, and identify any potential improvements to strengthen the sustainability credentials of options.

Forecast Effects

- 5.2.2 The majority of effects have been predicted to be "neutral". Indeed, only in relation to the objective of "meeting housing needs", is it possible to predict a significant effect. In terms of this objective, it is suggested that all three approaches will definitely have direct positive effects that are felt at the very local (site) level over a long duration of time (>10 years).
- 5.2.3 In terms of the other 20 SA objectives, it is not possible to identify significant effects. This reflects the fact that the options relate to strategic "directions of travel', rather than detailed policy approaches that will directly influence action "on the ground'. As a result, it is not possible to be sure how the options will impact upon the baseline (which, in any case, is itself understood only with considerable uncertainty).
- Table 5-1 discusses instances where there *may* be the *potential* for impacts on the baseline, depending on how an option is implemented. The table highlights instances where, depending on implementation, there may the potential for impacts to the environment' and members of the settled community, as well as instances where there may the potential for impacts to the Gypsy and Traveller community. It is in terms of "deprivation" and "health" impacts to the Gypsy and Traveller community that is possible to discuss impacts with the greatest degree of certainty. This reflects the fact that there is relatively good evidence available that allows the baseline situation in Solihull to be understood.



Recommendations

- 5.2.5 Given the appraisal findings, it is not possible to recommend that any one option be taken forward in preference to another. Rather, it is possible to conclude that, from the SA perspective, the best performing approach will be one that ensures need is met through a combination of expansion, increasing of capacity and allocation of new sites.
- 5.2.6 The following recommendation is made within Table 5-1:

Whichever option is implemented, 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 will increase the need for family groups to have to share sites.

Table 5-1: Discussion of potential effects (i.e. effects that cannot be predicted with any certainty at this stage)

SA Objective	Commentary
Prosperity	There is no evidence to suggest that existing sites tend to conflict with neighbouring uses in a way that impact upon "prosperity". However, from the national picture it is understood that there is the potential for such conflicts to arise. If it is the case that baseline problems do exist, then it may the case that expansion or increasing capacity has the effect of worsening the existing situation.
	It is assumed that new sites will be located to avoid any negative effects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this effect is highly uncertain, given that the location of new sites is unknown.
Access to jobs	There is no evidence to suggest that the location of existing sites in Solihull tends to negatively affect the ability of Gypsies and Travellers to access jobs etc. However, it is known that, nationally, this can be the case (although many Gypsy and Travellers choose to establish business operations on-site). If it is the case that the location of existing sites acts to restrict access to jobs, then it may be that expansion or increasing capacity at existing sites would perpetuate problems.
	It could be the case that well located new sites could improve access to jobs etc. for the Gypsy and Traveller community in the Borough. However, this effect is uncertain.
Reducing travel	There is no evidence to suggest that the location of existing sites in Solihull encourages car dependency. However, it is known that, nationally, car dependency amongst Gypsies and Travellers is high, and so it may be that expansion or increasing capacity at existing sites could perpetuate any problems that do exist.
	It could be that new sites would be located so that Gypsies and Travellers are encouraged to walk, cycle and make use of public transport, rather than rely on the car. However, this effect is uncertain.



Resource efficiency	Given that Gypsy and Traveller sites may to some degree sterilise adjacent land, increasing capacity at existing sites may avoid any worsening of the baseline situation (for the simple reason that the area of adjacent land is not increased), whilst allocating new sites could potentially lead to significant new areas of land becoming sterilised. However, this effect is highly uncertain given that the evidence is not available to suggest whether or not baseline problems exist, and it is not known where new sites would be located.
Greenhouse gases	As part of the development of new sites , or perhaps also the expansion of sites , it may be possible to put in place the infrastructure that allows Gypsies and Travellers to power and heat their homes more efficiently than is currently the case (e.g. mains electricity rather than on-site generators). However, this effect is highly uncertain and, in any case, the magnitude of the effect would be minimal.
Business adaptation	It is not expected that any of the alternative approaches (regardless of how they might be implemented on the ground) would lead to effects in terms of this objective.
Losses from flooding	Caravans can be vulnerable to flooding. However, there is no evidence to suggest that Gypsy and Traveller sites in Solihull tend to be located in areas of flood risk.
	It is expected that new sites would be located outside of flood zones.
Urban adaptation	It is not expected that any of the alternative approaches (regardless of how they might be implemented on the ground) would lead to effects in terms of this objective.
Biodiversity	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on local biodiversity. However, it is known that, nationally, this can be the case and so it may be that expansion or increasing capacity at existing sites could perpetuate any problems that do exist.
	It is assumed that new sites will be located to avoid any negative effects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this effect is highly uncertain, given that the location of new sites is unknown.
Landscape	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on landscape. However, it is known that, nationally, this can be the case and so it may be that expansion or increasing capacity at existing sites could perpetuate any problems that do exist.
	It is assumed that new sites will be located to avoid any negative effects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this effect is highly uncertain, given that the location of new sites is unknown.



Green infrastructure	It is not expected that any of the alternative approaches (regardless of how they might be implemented on the ground) would lead to effects in terms of this objective.
Historic environment	It is not thought that the location of existing sites leads to conflicts with historic environment related objectives; it is not thought that expansion or increased capacity at existing sites would give rise to conflicts.
	It is also assumed that new sites can avoid impacts.
Built environment	Gypsy and Traveller sites can distract from and negatively impact on local character and distinctiveness. The degree to which this is the case currently in Solihull is unknown, but there might be the potential for expansion or increasing capacity at existing sites to perpetuate any problems that do exist.
	It is likely that new sites would be located, and that landscaping measure could be put in place, to ensure any effects are mitigated. However, there may be some unavoidable negative effects.
Pollution	Gypsy and Travellers can tend to suffer from air, noise and light pollution. In Solihull, it is known that the location of a site in close proximity to the airport has led to problems of noise pollution.
	Equally, Gypsy and Traveller sites can be a source of pollution that affects neighbouring uses. There is no evidence to suggest that this is a particular problem within Solihull; however expansion or increasing capacity at existing sites could perpetuate any problems that do exist.
	It is assumed that new sites will be located to avoid any negative effects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this effect is highly uncertain, given that the location of new sites is unknown.



Deprivation	Causes of deprivation amongst the Gypsy and Traveller population of Solihull are multifaceted, but the location of sites and living environments on sites are likely to be an important causal factor. The location of unauthorised sites is not ideal, nor is the living environment on these sites. However, from the evidence, it appears that an overriding determinant of deprivation is the degree to which Gypsy and Travellers are able to live as part of an extended (largely family-based) support network, which in turn is a factor of the ability of family groups to be able to live on site together (or, failing this, to live in close proximity to one another).				
	Given this understanding of "the issues', if it is the case that expansion or increasing capacity at existing sites prevents the situation whereby individuals have to leave a site because of a lack of pitch space, then there is the potential for significant positive effects.				
	Should sites be expanded with a view to encouraging more families to live on the same site, then the potential for positive effects is more uncertain, and it may be that there is the potential for negative effects given that on-site conflicts are identified as an important determinant of well-being for Gypsies and Travellers.				
	Similarly, if the allocation of new sites allows family groups currently living on unauthorised sites to move to authorised sites, and remain together, then there are likely to be positive effects. However, if several family groups are forced to share newly allocated sites, then this could be to the detriment of well-being.				
	Recommendation				
	Whichever option is implemented, 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 will increase the need for family groups to have to share sites.				
Housing	Any of the three approaches has the potential to be an effective means of meeting Gypsy and Traveller housing needs.				
Commercial Assets	Where existing sites currently conflict with neighbouring uses, there may be some potential for expansion or increasing capacity at existing sites to worsen conflicts, and perhaps hinder the ability to attract and retain investment. However, there is no evidence to suggest that this will be the case in Solihull.				
	It is likely that new sites can be located so as to ensure no conflicts with the Borough's key commercial assets.				



Health inequalities	Available evidence suggests that levels of ill health are relatively low, but serious for a minority of families. However, there is a higher level of depression within the Gypsy and Traveller community, compared to the general population.				
	Perhaps the most important consideration is that expansion or increasing capacity at existing sites can allow families to live together on existing sites, and prevent a situation whereby individuals have to leave a site because of a lack of pitch space. If this is the case then there is the potential for significant positive effects. However, if sites are expanded with a view to encouraging more families to live on the same site, then there may be significant negative effects in terms of community and individual well-being.				
	Similarly, if the allocation of new sites allows family groups currently living on unauthorised sites to move to authorised sites, and remain together, then there are likely to be positive effects. However, if several family groups are forced to share newly allocated sites, then this could be to the detriment of well-being.				
	Recommendation				
	See discussion under "deprivation', above.				
Crime	Where conflicts exist with the neighbouring settled population, Gypsies and Travellers can fear criminal abuse. However, it is not thought that this is a significant problem in Solihull (this issue was not raised as a problem during a recent survey).				
	Equally, Gypsy and Traveller sites can be a cause of fear of crime amongst the settled population. However, there is no evidence to suggest that this is a particular problem within Solihull. Having said this, it might be that expansion or increasing capacity at existing sites has the potential to perpetuate any problems that do exist.				
	It is assumed that new sites will be well located and so avoid any negative effects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this effect is highly uncertain, given that the location of new sites is unknown.				
Public safety	The location of Gypsy and Traveller sites can sometimes mean that there are issues of road safety for Gypsies and Travellers, and perhaps also the neighbouring settled population. There is no evidence to suggest that this is the case in Solihull; but expansion or increasing capacity at existing sites has the potential to perpetuate any existing problems.				
	It is assumed that new sites will be located to avoid any negative effects. If existing problems do exist, then it may be that allocating new sites can help to address such issues. However, this effect is highly uncertain, given that the location of new sites is unknown.				



Mixed development

New sites may come forward as part of mixed developments. However, this is highly uncertain. It is difficult to say, at this current stage, whether such an approach would be advisable from a perspective of wishing to support better understanding and integration between Gypsy and Traveller and settled communities. A recent survey did not find that increased integration is a priority for the local

5.3 Draft policy approach for Gypsy and Traveller related development

Introduction

5.3.1 This section presents a summary of the appraisal of the draft policy approach for Gypsy and Traveller related development, as presented in the Gypsy and Traveller Site Allocations DPD Options Paper. The aim of the appraisal is to establish the sustainability performance of the draft approach, and identify any potential improvements to strengthen its sustainability credentials.

Gypsy and Traveller community.

- 5.3.2 The draft policy approach is as follows:
 - Access/turning space should be good enough to include emergency vehicles and comply with Fire Service requirements.
 - The design/layout should clearly define individual pitches but without 'enclosing' them too much with inappropriate high, close-boarded fencing.
 - Appropriate landscaping proposals, to include where necessary, hard landscaping, fencing
 and boundary treatment to soften any visual impact and protect amenity but not enclose and
 separate the site so much that it hampers cohesion with the neighbouring settled
 community.
 - Look for opportunities for Sustainable Drainage Systems.
 - Accommodate travelling lifestyle by provision of room for at least one touring caravan per pitch.
 - Schemes should make clear what commercial activity, if any, would be carried out on the site and where.
 - Proposed amenity buildings or day rooms should be the minimum necessary to provide required facilities, be sensitively sited, and use sympathetic materials.
 - Details of the keeping of animals to be submitted with applications.
 - External lighting should be controlled and kept to a minimum.
 - In order to ensure good design, detailed applications for Gypsy and Traveller sites and Gypsy and Traveller related development should have regard to guidance outlined in "Designing Gypsy and Traveller Sites - Good Practice Guide".

Forecast Effects

5.3.3 From **Table 5-2** below, it can be seen that the effects of this policy approach will be very positive. The table highlights that:



- The majority of effects will be felt at the "site' scale (i.e. by the Gypsy and Traveller population and those with an interest in neighbouring uses.
 - In terms of the "flood risk' SA objective, there is the potential for benefits to be felt
 more widely. This reflects the fact that sustainable drainage implemented on-site
 could potentially reduce flood risk downstream. However, the magnitude of
 downstream benefits would be minimal.
- The majority of benefits are "potential" (i.e. somewhat uncertain).
 - Benefits in terms of "Jandscape', "built environment' and "pollution' are more certain. This reflects the fact that the draft policy approach identifies particular priorities that should be addressed on-site. For example, in recognition of the fact that light pollution can be an issue, the policy requires that "'External lighting should be controlled and kept to a minimum'
- Some benefits are direct, whilst other benefits will come as an indirect result of the draft policy approach.
 - Direct benefits result from the explicit focus of the draft policy approach on "Jandscape", "built environment" and "pollution".
 - Direct benefits are also forecast in terms of "public health". This reflects the fact
 that the draft policy approach requires that planning applications for Gypsy and
 Traveller sites and Gypsy and Traveller related development should have regard
 to guidance outlined in "Designing Gypsy and Traveller Sites Good Practice
 Guide". This guide includes a considerable focus on ensuring on-site health and
 safety.
 - There is the potential for the draft policy approach to have indirect effects in terms
 of "prosperity', "deprivation', "health inequalities' and "crime'. This reflects the
 assumption that the draft policy approach will lead to improved living environments
 on-site, as well as reduced potential for conflicts with the neighbouring settled
 community.

Table 5-2: Breakdown of forecast effects

Site	8	Unlikely	0	Direct	5	Positive	9	Maj +ve	0
Local	1	Potential	6	Indirect	4	Negative	0	Mod+ve	0
District	0	Likely	3	Cumul	0			Min+ve	8
Regional	0	Definite	0					Neutral	13
National	0							Min-ve	0
								Mod-ve	0
								Maj -ve	0

Recommendations

5.3.4 The draft policy approach clearly seeks to reflect identified priorities. The only recommendation is that the Council should continue to gather evidence, and ensure that any new issues arising are reflected within the final policy.



5.4 Draft policy approach to addressing tenure

Introduction

- 5.4.1 This section presents a summary of the appraisal of the draft policy approach to addressing tenure, as presented in the Gypsy and Traveller Site Allocations DPD Options Paper. The aim of the appraisal is to establish the sustainability performance of the draft approach, and identify any potential improvements to strengthen its sustainability credentials.
- 5.4.2 The draft policy approach is as follows:

It is considered that as part of its overall identified pitch requirement, the Council should make provision for an element of socially rented pitches. A possible way of assessing the number of socially rented pitches to be provided in the Borough is to adopt the same percentage figure as the number of respondents who expressed a preference to live on Council sites (i.e. 17%).

Forecast effects

- 5.4.3 From **Table 5-3**, it can be seen that the effects of this policy approach will be neutral for the majority of SA objectives, but positive in terms of three objectives. These objectives are: "housing', "deprivation' and "health'.
- Where as benefits in terms of housing are likely and "direct', benefits in terms of deprivation and health are "potential' and "indirect'. Benefits reflect the fact that availability of affordable pitches is a key determinant of well-being for Gypsies and Travellers, and that not all Gypsy and Travellers will be able to afford market rates at privately owned sites.

Table 5-3: Breakdown of forecast effects

Site	0	Unlikely	0	Direct	1	Positive	3	Maj +ve	0
Local	3	Potential	2	Indirect	2	Negative	0	Mod+ve	1
District	0	Likely	1	Cumul	0			Min+ve	2
Regional	0	Definite	0					Neutral	18
National	0							Min-ve	0
								Mod-ve	0
								Maj -ve	0

Recommendations

5.4.5 There is no evidence to suggest that an alternative percentage figure would be more appropriate, from the SA perspective. However, it is important to note that the survey findings from which the 17% figure derives are somewhat uncertain, with the report noting that there is the potential for the actual preference for family-owned sites to be under-recorded. This issue could potentially necessitate further research.



6 Conclusions

- 6.1.1 The following is a general summary of appraisal findings:
 - Options for 'the approach to meeting need' It is difficult to identify significant effects, and
 hence difficult to suggest which option might be best performing from the SA perspective.
 Rather, it is likely that the best performing approach will be one that ensures need is met
 through a combination of expansion, increasing of capacity and allocation of new sites.
 Whichever approach is implemented, 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 will increase the need for family groups to have to share sites.
 - The draft policy approach for Gypsy and Traveller related development The draft
 policy approach clearly seeks to reflect identified priorities. As a result, it has been
 appraised as performing well from the SA perspective. The only recommendation is that the
 Council should continue to gather evidence, and ensure that any new issues arising are
 reflected within the final policy.
 - The draft policy approach to addressing 'tenure' Ensuring that a proportion of new pitches are socially rented is beneficial from a perspective of "deprivation' and "health' related sustainability objectives. Currently, it is suggested that 17% of pitches are socially rented. There is no evidence to suggest that an alternative percentage figure would be more appropriate. However, it is important to note that the survey findings from which the 17% figure derives are somewhat uncertain, with the report noting that there is the potential for the actual preference for family-owned sites to be under-recorded. This issue could potentially necessitate further research.



Appendix I - Evolution of the SA Objectives

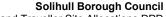
2008 Objectives	2011 Objectives	Rationale
Sustainable consumption & production		
Encourage sustainable economic growth and prosperity for all in a diverse local economy, with employment opportunities suited to the needs of the local workforce	To contribute to regeneration and economic development initiatives spatially targeted towards on specific community groups	The inequalities in both employment opportunities and access to employment across the Borough features in the Sustainable Community Strategy as needing attention.
Ensure education and training opportunities for all and value the contribution of unpaid work	To reduce the number of people with access difficulties to employment, education and training opportunities	The 2008 framework is not directly amenable to the influence of the Core Strategy. Also accessibility to employment, education and training relate more directly to sustainable consumption & production
Reduce the need to travel by encouraging housing growth in accessible locations and local sourcing of food, goods and materials, and encourage the use of more sustainable modes, such as public transport, cycling and walking	To ensure that the location of development makes efficient use of existing physical infrastructure and helps to reduce the need to travel	The previous objective is focused upon housing location, whereas the 2011 objective takes a wider stance on the location of all development
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	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 a. Deliver reductions in the quantity of water used in the Borough b. Deliver reductions in the waste arisings and to move up the waste hierarchy. c. To use brownfield sites where appropriate where there is no net loss of ecological value d. To promote resource efficiency	The 2011 objectives are used as sub- objectives to the 2008 objective





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	2008 Objectives	2011 Objectives	Rationale
Th	eme 2 - Climate change and energy		
•	Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation	Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation a. To deliver quantified reductions in greenhouse gas emissions by 2020 that contribute to the 34% reduction target b. To encourage reduced energy use, use of distributive energy systems and renewable energy	The 2011 objectives provide greater focus reflecting the national objectives set for emissions
•	Protect all from the impacts of climate change, such as increased temperatures and flooding	 6. To assist in the adaptation businesses need to become or resource efficient and also to deliver more sustainable products and services better equipped to a changing market place caused by climate change. 7. Manage, maintain and where necessary improve the drainage network to reduce the economic losses from flooding 	It is increasingly acknowledged that climate change will result in consequences beyond those of flooding, hence this wider appreciation has been reflected in the 2011
		To ensure that development provides for adaptation to urban heating and to the effects of high winds	objectives.
6.1	.2 Theme 3 - Natural resource protecti	on and environmental enhancement	
•	Conserve, restore and enhance biodiversity	To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species	A more focused objective has been provided that deliberately addresses non-designated sites given that designated sites are protected islands of valued biodiversity and to address the consequences of climate change greater connectivity is required.
•	Protect and enhance environmental assets such as landscape, countryside, historic environment and open space	To 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 To facilitate the delivery and enhance the quality of areas providing green infrastructure	The 2011 objectives provide a more specific focus.
		12.To enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects	
•	Promote high quality built environment and encourage local distinctiveness	13.To deliver improvements in townscape and enhance local distinctiveness	The 2011 objective delivers a more positive footing.





Solihull Borough Council Sustainability Appraisal of the Gypsy and Traveller Site Allocations DPD

	2008 Objectives	2011 Objectives	Rationale
•	Minimise air, soil, water, light and noise pollution	14. Minimise air, soil, water, light and noise pollution a. To continue to deliver reductions in particulate and nitrogen dioxide levels b. To generate desirance network to accurate and deliverant to surface water.	The 2011 objective includes sub-objectives that are more focused.
		 To manage drainage network to ensure no detriment to surface water quality 	
		c. To reduce the intrusion of urban and highway lighting	
		 d. To deliver reductions in road traffic noise focusing upon those areas identified as First Priority Locations 	
		e. To conserve soils thereby supporting other objectives	
Th	eme 4 - Sustainable communities		
•	Reduce social exclusion and disparities within the Borough	15. To improve community capital and reduce social isolation across the social gradient	The 2011 objective takes a more positive stance than the 2008 objective
•	Improve the supply and affordability of housing	16. Improve the supply and affordability of housing in those areas of greatest need	The 2011 provides a spatial focus to the objective
•	Ensure the Borough's national and regional assets reflect wider needs	17. Ensure the Borough's national and regional assets reflect wider needs	No change
•	Improve health, reduce health inequalities and promote healthy lifestyles, and encourage increased cultural and recreational opportunities for all	18. To 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	To provide an approach in which the public health agenda is integrated into the decision making across the Borough
•	Reduce crime, fear of crime and anti-social behaviour	19. Reduce crime, fear of crime and anti-social behaviour 20. Enhance public safety	No change
•	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.	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.	No change



Appendix II - Significance Rules

Overall significance is assigned by the appraisal tool according to the criteria presented below.

Minor

Cause and effect likely affecting local areas for over 3 years but effects are unlikely to be reversible and do not cause district scale cumulative effects.

Cause and effect either clearly not clearly established but limited to district wide effects lasting for less than 10 years. Anticipated that effects may or may not be reversible. Potential effects of less than 3 years duration at a regional scale which may or may not be reversible.

Permanent local scale potential or likely direct or indirect effects that may or may not be reversible.

Moderate

Cause and effect likely to occur at a district scale extending between 3-10 years and that are unlikely to be reversible but do not affect regional or national resources.

Cause and effect can be likely to or certain to occur but there will be district effects that extend for over 10 years that are unlikely to be reversible and do not affect regional or national resources

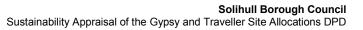
Cause and effect not clearly established but potential for effects upon regional or national interests for any duration that may or may not be reversible

Major

Cause and effect directly attributable to change of more than 10 years to the existing conditions likely to occur over a wide area at a district scale that is unlikely to be reversible.

A potential cause and direct effect with a duration of more than 3 years that may cause cumulative effects upon regional or national interests that is may not be reversible

A cause and effect is likely or would occur with national or regional interests being affected that may or may not be reversible





Appendix III - Appraisal Tables





Table A: Appraisal of the 'Expand existing authorised sites' option

SA/SEA Objectives	Duration	Sca)3	Likelihood	Directingles of Cumulative	Bayarsibility	Positive/Neutral/ Negative	Spatial Distribution	Scoial Equily	Significance	Justification and recommendations
Sustainable Consump Prosperity	ition &	Produc	etion	25t 7	25	753		5	Noutral	There is no evidence to suggest that existing sites tend to conflict with neighbouring uses in a way that impacts upon 'prosperity'. However, from the national picture it is understood that there is the potential for such conflicts to arise. If it is the case that baseline problems do exist, then 'expansion' may wersen the existing situation.
Access to jobs	2	14		4		[20]	ŭ.	Ethnicity /	Noutral	There is no evidence to suggest that the location of existing sites in Solihull tends to negatively affect the ability of Gypsies and Travellors to access jobs etc. I lowever, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then "expansion" may wereen the existing situation.
Reducing travel	3.98	25	*	227	*	153	*	*	Noutral	There is no evidence to suggest that the location of existing sites in Solihull tends to encourage car dependency. However, it is known that, nationally, car dependency amongst Gypsies and Travellers is high. If it is the case that baseline problems do exist, then 'expansion' may wersen the existing situation.
Resource efficiency	(Z)	S.	\$ <u>\$</u>		9	22	2	5	Noutral	Given that Cypsy and Travellor sites may to some degree sterilise adjacent land, it might be suggested that expansion at existing sites would help to avoid wersening of the baseline situation (for the simple reason that the area of adjacent land is only minimaly increased). However, this effect is highly uncertain given that the evidence is not available to suggest whether or not baseline problems tend to exist.
Climate Change and E	neray									
Greenhouse gases	. 	ж	Э¥		÷		æ	*		As part of the expansion of sites, it may be possible to put in place the infrastructure that allows Cypsies and Travellers to power and heat their homes more officiently than is currently the case (e.g. mains electricity rather than on-site generators). However, this offect is highly uncertain and, in any case, the magnitude of the offect would be minimal.
Business adaptation	62	50	55	22.7	3	20	3	25	Noutral	No offact.
Losses from flooding		% <u>:</u>	50	927	3	20		9	Noutral	Caravans can be vulnerable to fleeding. However, there is no evidence to suggest that Cypsy and Traveller sites in Solihull tend to be located in areas of fleed risk.
Urban adaptation	4.	94		4		20	-	ą.	Noutral	No offoct.
Natural Hesource Pro	tection	1 &								
Biodiversity	(4)	9	92	4		-0	÷	4	Noutral	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on local biodiversity. However, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then 'expansion' may wersen the existing situation.
Landscape	828	25	25	100	30	TN	70	7	Noutral	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on landscape. However, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then 'expansion' may wersen the existing situation.
Green infrastructure	223			225	4	43	92	942	Noutral	No offoct
Historic environment	1940	9	92	(4)		20	ų.	ų.	Noutral	It is not thought that the location of existing sites leads to conflicts with historic environment related objectives; it is not thought that expansion at existing sites would give rise to conflicts.
Builtenvironment	1943	9	92	4	×	20		ų.	Noutral	Gypsy and Travellor sitos can distract from and negatively impact on local character and distinctiveness. The degree to which this tends to be the case currently in Solihull is unknown. If it is the case that baseline problems do exist, then 'expansion' may werson the existing situation
Pollution	1783	in.	**	22	100	70	7	Ethnicity / Raco	Noutral	Gypsy and Travellors can tend to suffer from air, noise and light pollution. In Solihull, it is known that the location of a site in close proximity to the airport has led to problems of noise pollution. Equally, Gypsy and Travellor sites can be a source of pollution that affects neighbouring uses. There is no evidence to suggest that this tends to be a problem within Solihull; but if it is the case that baseline problems do exist, then 'expansion' may wersen the existing situation.





SA/SEA Objectives	Duration	Scaly	LKellhood	Directingins of Cumulative	Gavers billicy	Positive/Neutral/ Negative	Spatial Distribution	Scolal Equily	Signideanes	Justification and recommendations
Sustainable Commun	nities									Causes of deprivation amongst the Cypsy and Travellor population of Solihull are multifaceted.
Deprivation	(4)	*	*	-	20	145	48 -	Lithnicity / Raco	Noutral	The location of unauthorised sites is not ideal and the living environment on these sites is less than ideal; however, it is not clear that this is a major determinant of deprivation. From the evidence, it appears that an overriding factor is the degree to which Cypsy and Travellors are able to live as part of an extended (largely family-based) support network, which in turn is a factor of the ability of family groups to be able to live on site together (or, failing this, to live in close proximity to one another). Given this understanding of 'the issues', if it is the case that 'expansion' at existing sites prevents the situation whereby individuals have to leave a site because of a lack of pitch space, then there is the potential for significant positive offects. I lowever, if sites are expanded with a view to encouraging more families to live on the same site, then the potential for positive effects is more uncertain, and it may be that there is the potential for negative effects given that on-site conflicts are identified as an important determinant of well-being for Gypsies and Travellors.
Housing	>10 voars	Local	Dofinito	Direct	Yos	4:V0	ΛII	Ethnicity /	Mod::vo	Expansion of sitos is likely to help most Cypsy and Traveller housing needs.
Commercial Assets	,,,,,,	23	25	32	100		10	2	Noutral	Where existing sites currently conflict with neighbouring uses, there may be some potential for 'expansion' to wersen conflicts, and porhaps hinder the ability to attract and rotain investment. I lowever, there is no evidence to suggest that existing sites have an effect on commercial assets.
Health inequalities	7 <u>2</u> 5	σ	Ü	ξ.	228	529	194	Ethnicity / Raco	Noutral	Available evidence suggests that levels of ill health are relatively low, but serious for a minority of families. However, there is a higher level of depression within the Cypsy and Traveller community, compared to the general population. Perhaps the most important consideration is that "expansion" at existing sites can allow families to live together on existing sites, and prevent a situation whereby individuals have to leave a site because of a lack of pitch space. If it is the case that "expansion" at existing sites prevents the situation whereby individuals have to leave a site because of a lack of pitch space, then there is the potential for significant positive effects. However, if sites are expanded with a view to encouraging more families to live on the same site, then there may be significant negative effects in terms of community well-being.
Crime	30	23	22	122	10	846	20	Lithnicity / Raco	Noutral	Whore conflicts exist with the neighbouring settled population, Gypsy and Travellors can fear criminal abuse. However, it is not thought that this is a significant problem in Solihull (this issue was not raised as a problem during a recent survey). Equally, Gypsy and Travellor sites can result in a fear of crime amongst the settled population. However, there is no evidence to suggest that this tends to be a problem associated with existing sites in Solihull. Having said this, it might be that 'expansion' at existing sites has the potential to perpetuate any problems that do exist.
Public safety	1.5	*	荔	85	73	175	183	Ethnicity / Raco	Noutral	The location of Gypsy and Travellor sites can semetimes mean that there are issues of read safety for Gypsies and Travellors, and perhaps also the neighbouring settled population. There is no evidence to suggest that this tends to be the case in Solihull; but 'expansion' at existing sites has the potential to perpetuate any problems that do exist.
Mixed development	4	20	2	12	100		100	223	Noutral	No offact



Table B: Appraisal of the Increase capacity on existing authorised sites option

SA/SEA Objectives Sustainable Consump	Doradion .	Scalls	Likelihood	Birect/indinect/C umulative	Beversibility	Positiva/ Nautral/ Nagativa	Spatial Distribution	Social Equily	Signillosmos	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
austainable Consump	non &	Produ	caon							There is an address to account that address of the standard and the relative value of the standard and the s
Prosperity					-				Noutral	There is no evidence to suggest that existing sites tend to conflict with neighbouring uses in a way that impacts upon 'presperity'. I lowever, from the national picture it is understood that there is the potential for such conflicts to arise. If it is the case that baseline problems do exist, then 'increasing capacity' may wersen the existing situation.
Access to jobs								Ethnicity / Raco	Noutral	There is no evidence to suggest that the location of existing sites in Solihull tends to negatively affect the ability of Cypsies and Travellers to access jobs etc. However, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then 'increasing capacity' may wersen the existing situation,
Reducing travel				-					Noutral	There is no evidence to suggest that the location of existing sites in Solihull tends to encourage car dependency. However, it is known that, nationally, car dependency amongst Cypsies and Travellers is high. If it is the case that baseline problems do exist, then increasing capacity' may wersen the existing situation,
Resource efficiency									Noutral	Civon that Gypsy and Travellor sitos may to some degree sterilise adjacent land, it might be suggested that expansion at existing sites would help to avoid worsening of the baseline situation (for the simple reason that the area of adjacent land is only minimally increased). However, this effect is highly uncertain given that the evidence is not available to suggest whether or not baseline problems tend to exist.
Climate Change and ₽	nergy									
Greenhouse gases									Noutral	No offect
Business adaptation									Noutral	Νο οίδοιά.
Losses from flooding									Noutral	Caravans can be vulnerable to flooding. However, there is no evidence to suggest that Cypsy and Traveller sites in Solihull tend to be located in areas of flood risk.
Urban adaptation							-		Noutral	No offoct.
Natural Resource Prot	ection	ı & Env	. Enhan	cement						
Biodiversity									Noutral	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on local biodiversity. However, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then increasing capacity' may wersen the existing situation,
Landscape									Noutral	There is no evidence to suggest that existing sites in Solihull tend to be located where there is the potential to impact negatively on landscape. However, it is known that, nationally, this can be the case. If it is the case that baseline problems do exist, then 'increasing capacity' may wersen the existing situation,
Green infrastructure									Noutral	No office?
Historic environment									Noutral	It is not thought that the location of existing sites leads to conflicts with historic environment related objectives; it is not thought that increasing capacity at existing sites would give rise to conflicts.
Built environment			-			-	-		Noutral	Cypsy and Travollor sitos can distract from and nogatively impact on local character and distinctiveness. The degree to which this tends to be the case currently in Solihull is unknown. If it is the case that baseline problems do exist, then 'increasing capacity' may wersen the existing situation,
Pollution		-			-	-	-	Ethnicity / Raco	Noutral	Cypsy and Travellors can tend to suffer from air, noise and light pollution. In Solihull, it is known that the location of a site in close proximity to the airport has led to problems of noise pollution. I qually, Cypsy and Travellor sites can be a source of pollution that affects neighbouring uses. There is no evidence to suggest that this tends to be a problem within Solihull; but if it is the case that baseline problems do exist, then 'increasing capacity' may wersen the existing situation,



SA/SEA Objectives Sustainable Commun	Daretton	ශිරන)ම	Likelihood	Direct/Indirect/C concolative	Hawarsibility	Positiva/ Nautral/ Nagativo	Spatial Distribution	Social Equily	Signifficance	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
Deprivation								Ethnicity / Raco	Noutral	Causes of deprivation amongst the Cypsy and Travellor population of Solihull are multifaceted. The location of unauthorised sites is not ideal and the living environment on those sites is less than ideal; however, it is not clear that this is a major determinant of deprivation. From the evidence, it appears that an overriding factor is the degree to which Cypsy and Travellors are able to live as part of an extended (largely family-based) support network, which in turn is a factor of the ability of family groups to be able to live on site together (or, failing this, to live in close proximity to one another). Civen this understanding of 'the issues', if it is the case that 'increasing capacity' at existing sites provents the situation whereby individuals have to leave a site because of a lack of pitch space, then there is the potential for significant positive effects.
Housing Commercial Assets	10 yoar 	l.ocal	Dofinito 	Diroct	Yos 	:vo	All 	Ethnicity /Raco	Mod:vo	However, if capacity is increased with a view to encouraging more families to live on the same site, then the potential for positive effects is more uncertain, and it may be that there is the potential for negative effects given that on-site conflicts are identified as an important determinant of well-being for Gypsies and Travellors. Increasing the capacity of sites is likely to help most Gypsy and Travellor housing needs. Where existing sites currently conflict with neighbouring uses, there may be some potential for "increasing capacity" to wersen conflicts, and porhaps hinder the ability to attract and rotain investment. However, there is no evidence to suggest that existing sites
Health inequalities		-						Ethnicity /Raco	Noutral	have an offect on commercial assets. Available ovidence suggests that levels of ill health are relatively low, but serious for a minority of families. However, there is a higher level of depression within the Gypsy and Travellor community, compared to the general population. Porhaps the most important consideration is that 'increasing capacity' at existing sites can allow families to live tegether on existing sites, and provent a situation whereby individuals have to leave a site because of a lack of pitch space. If it is the case that 'increasing capacity' at existing sites provents the situation whereby individuals have to leave a site because of a lack of pitch space, then there is the potential for significant positive effects. However, if the capacity of sites is increased with a view to encouraging more families to live on the same site, then there may be significant negative offects in terms of community well-being.
Crime		-						Fithnicity / Raco	Noutral	Where conflicts exist with the neighbouring softled population, Cypsy and Travellers can fear criminal abuse. However, it is not thought that this is a significant problem in Solihull (this issue was not raised as a problem during a recent survey). Equally, Cypsy and Traveller sites can result in a fear of crime amongst the softled population. However, there is no evidence to suggest that this tends to be a problem associated with existing sites in Solihull. Having said this, it might be that 'increasing capacity' at existing sites has the potential to perpetuate any problems that do exist.
Public safety								Ethnicity / Raco	Noutral	The location of Cypsy and Travellor sites can semotimes mean that there are issues of read safety for Cypsies and Travellors, and perhaps also the neighbouring settled population. There is no evidence to suggest that this tends to be the case in Solihull; but 'increasing capacity' at existing sites has the potential to perpetuate any problems that do exist.
Mixed development								-	Noutral	No offoct



Table C: Appraisal of the Allocate new sites option

SA/SEA Objectives Sustainable Consum	Duration a	e(isos)	Like liheed	Directionine of Cumulative	Dayarsibility	Posttiva/ Nautral/ Nagativa	Spatial Distribution	Scolal Equily	Significance	Justification, Wittigation and enhancement measure (those in italics are already proposed in the plan)
	ipuon e	riouu	Cuon							It is assumed that now sites will be well located and so avoid any negative effects. If existing problems do exist, then it may be that
Prosperity						•		•	Noutral	allocating now, well located sites can help to address those. However, this effect is highly uncertain.
Access to jobs						-		Ethnicity / Raco	Noutral	It could be the case that well located new sites could improve access to jobs etc. for the Gypsy and Traveller community in the Berough. However, this effect is uncertain.
Reducing travel									Noutral	It could be that newly allocated sites would be located so that Cypsies and Travellers are encouraged to walk, cycle and make use of public transport, and so rely on the car less than is the case currently. However, this effect is uncertain.
Resource efficiency		-		-						Given that Cypsy and Traveller sites may to some degree sterilise adjacent land, it might be suggested that allocating new sites could potentially load to significant new areas of land becoming sterilised (for the simple reason that the area of adjacent land is increased). However, this effect is highly uncertain given that it is not known where new sites would be allocated if this option were to be taken-up.
Climate Change and	Energy	1								
Greenhouse gases						-				As part of the development of new sites it may be possible to put in place the infrastructure that allows Gypsies and Travellers to power and heat their homes more officiently than is currently the case (e.g. mains electricity rather than on-site generators). However, this effect is highly uncertain and, in any case, the magnitude of the officet would be minimal.
Business adaptation									Noutral	No offoct.
Losses from flooding						-			Noutral	Caravans can be vulnerable to fleeding. However, there is no evidence to suggest that Cypsy and Traveller sites in Solihull are lecated in areas of fleed risk.
Urban adaptation				-					Noutral	No offoct.
Natural Resource Pr	otectio	n & Env	<i>l</i> .							
Biodiversity				-		-			Noutral	It is assumed that now sites will be well located and so avoid any negative effects. If existing problems do exist, then it may be that allocating now, well located sites can help to address these. I lowever, this effect is highly uncertain.
Landscape									Noutral	It is assumed that now sites will be well located and so avoid any negative effects. If existing problems do exist, then it may be that allocating now, well located sites can help to address these. I lowever, this effect is highly uncertain.
Green infrastructure									Noutral	No offoct
Historic		-						-	Noutral	It is also assumed that new sites can avoid impacts.
Builtenvironment									Noutral	It is likely that now sites would be well located, and that landscaping measure could be put in place to ensure any offects are mitigated. However, there may be some unavoidable negative offects.
Pollution						-		Ethnicity / Raco	Noutral	It is assumed that now sites will be well located and so avoid any negative offects. If existing problems do exist, then it may be that allocating new, well located sites can help to address these. However, this offect is highly uncertain.
Sustainable Commu	nities									
Deprivation	-	-	-					Ethnicity / Raco		Causos of deprivation amongst the Cypsy and Traveller population of Solihull are multifaceted. The location of unauthorised sites is not ideal and the living environment on those sites is less than ideal; however, it is not clear that this is a major determinant of deprivation. From the evidence, it appears that an everriding factor is the degree to which Cypsy and Travellers are able to live as part of an extended (largely family-based) support network, which in turn is a factor of the ability of family groups to be able to live on site tegether (or, failing this, to live in close preximity to one another). If the allocation of new sites allows family groups currently living on unauthorised sites to move to authorised sites, and remain tegether, then there are likely to be positive effects. However, if several family groups are forced to share newly allocated sites, then this could be to the detriment of well-being.
Housing	10 yoa	r I.ocal	Dofinito	Direct	Yos	:·vo	ΛII	Ethnicity / Raco	Mod:vo	Allocating now sites has the potential to be an effective means of meeting Cypsy and Traveller housing needs.





SA/SEA Objectives	Boration	Scale	Likelihood	Direct/Indirect/ Cumulative	Reversibility	Positiva/ Nautral/ Nagativo	Spatial Distribution	Scoial Equily	Sigmilioamos	Justification, Witigation and enhancement measure (those in Italics are already proposed in the plan)
Commercial Assets									Noutral	It is assumed that now sites can be located so as to ensure no conflicts with the Borough's key commercial assets.
Health inequalities				-				Ethnicity / Raco	Noutral	Available evidence suggests that levels of ill health are relatively low, but serious for a minority of families. However, there is a higher level of depression within the Cypsy and Travellor community, compared to the general population. If the allocation of new sites allows family groups currently living on unauthorised sites to move to authorised sites, and remain together, then there are likely to be positive effects. However, if several family groups are forced to share newly allocated sites, then this could be to the detriment of well-being.
Crime								Ethnicity / Raco		It is assumed that now sites will located to avoid any negative effects. If existing problems do exist, then it may be that allocating new sites can help to address these problems. However, this effect is highly uncertain.
Public safety								Ethnicity / Raco		It is assumed that now sites will located to avoid any negative effects. If existing problems do exist, then now may help to address those problems. However, this effect is highly uncertain.
Mixed development									Noutral	Now sitos may come forward as part of mixed developments. However, this is highly uncertain. It is difficult to say, at this current stage, whether such an approach would be advisable from a perspective of wishing to support better understanding and integration between Cypsy and Travellor and settled communities.



Table D: Appraisal of the draft policy approach for Gypsy and Traveller related development

II.										
SA/SEA Objectives	Duration	Scale	പ്യയിന്റെയി	Direct/Indirect/ Comolative	Reversibility	Positiva/ Nautral/ Nagativo	Spatial Distribution	Social Equily	Signiffoamos	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
Sustainable Consum	ipaon & i	roauc	caon							The draft policy approach requires that 'Schemes should make clear what commercial activity, if any, would be carried out on the site
Prosperity	∙10 yoar	Sito	Potontial	Indiroct	Yos	-:-	ΛII	Ethnicity / Raco		and where o.' This will holp to onsure conflicts with neighbouring commercial uses are avoided. Also, it will holp to onsure conflicts with neighbouring commercial uses are avoided. Also, it will holp to onsure that early consideration is given to designing sites in such a way that enables the most to be made of on-site commercial activity.
Access to jobs									Noutral	The draft policy considerations will be used to judge detailed planning applications. By this point, the location of the site (i.e. the key determinant of access to jobs) will already have been determined.
Reducing travel										The draft policy considerations will be used to judge detailed planning applications. By this point, the location of the site (i.e. the key determinant of travel need) will already have been determined.
Resource efficiency		-								The draft policy considerations will be used to judge detailed planning applications. By this point, the location of the site (i.e. the key determinant of efficient land use) will already have been determined.
Climate Change and	Energy									
Greenhouse gases	-		-		-	-			Noutral	The draft policy approach requires that detailed applications for Cypsy and Traveller sites and Gypsy and Traveller related development should have regard to guidance outlined in 'Designing Cypsy and Traveller Sites - Good Practice Guide'. This guide includes a section on requirements for energy supply. However, the guide focuses primarily on 'socurity of supply' and health and safety considerations, and does not promote any low carbon approaches.
Business adaptation	· ·					-		-	Noutral	No offoct
Losses from flooding	∙10 yoar	l.ocal	Potontial	Diroct	Yos	-:-	ΛII	Ethnicity / Raco	Noutral	The draft policy approach seeks to ensure that detailed planning applications 1.ook for opportunities for Sustainable Drainage Systems'.
Urban adaptation										The draft policy approach identifies landscaping priorities, but does not reference the need to provide shade given the potential for increased heatwaves in the future. It is also noted that the 'Designing Cypsy and Traveller Sites - Good Practice Guide' does not reference climate change adaptation or the provision of shade.
Natural Resource Pr	otection	& Env.								
Biodiversity						-			Noutral	The draft policy approach identifies landscaping priorities, but does not reference the need to give weight to biodiversity considerations. It is also noted that the Designing Gypsy and Traveller Sites - Good Practice Guide does not reference biodiversity.
Landscape	-10 yoar	Sito	Likoly	Diroct	Yos	-:-VO	ΛІΙ	Multiplo		The draft policy approach scoks to ensure that detailed planning applications include 'Appropriate landscaping proposals, to include where necessary, hard landscaping, fencing and boundary treatment to soften any visual impact and protect amonity but not enclose and separate the site so much that it hampers cohesion with the neighbouring softled community.'
Green infrastructure	-				-				Noutral	The draft policy approach identifies landscaping priorities, but does not reference the need to give weight to green infrastructure considerations. It is also noted that the 'Designing Cypsy and Traveller Sites - Good Practice Guide' does not reference green infrastructure.
Historic environment			-							The draft policy considerations will be used to judge detailed planning applications. By this point, the location of the site (i.e. the key determinant of offects to the historic environment) will already have been determined.
Builtenvironment	-10 yoar	Sito	Likoly	Diroct	Yos	-:-	ΛII	Multiplo		In addition to softing out landscaping priorities, the draft policy approach sooks to ensure that 'Proposed amenity buildings or day rooms should be the minimum necessary to provide required facilities, be sensitively sited, and use sympathetic materials.'
Pollution	-10 yoar	Sito	Likoly	Diroct	Yos	-:V0	ΛII	Multiplo	Min⊹vo	The draft policy approach requires that 1 external lighting should be controlled and kept to a minimum'





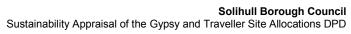
SA/SEA Objectives	Duration	Scale	Likelihoca	Direct/indirect/ Comolative	Reversibility	Positivs/ Nautral/ Negativo	Spatifal Distribution	Social Equity	Signiffeanes	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
Sustainable Commu	nities									
	∍10 yoar	Sito	Potontial	Indiroct	Yos	÷vo	ΛШ	Ethnicity / Raco	Min:vo	Cood on-site relations between individuals and between family groups will help to ensure that strong 'support networks' exist. In turn, support networks can help to minimise the potential for individuals or family groups to suffer from social exclusion and multiple deprivation. The focus of the draft policy approach on 'defining individual pitches,,, without 'enclosing' them too much' is likely to be beneficial. It is also noted that an approach to landscaping is favoured that 'fdoes not enclose and separate the site so much that it hampers cohesion with the neighbouring settled community. Over the long-term, this may be beneficial in terms of ensuring integration and understanding between settled and travelling communities, and so perhaps reducing the potential for social exclusion and deprivation. However, it is noted that survey results suggest that increased integration with the settled community is not currently viewed as a priority by residents of existing sites in the Borough.
Housing									Nourral	
Commercial Assets		-					-		Noutral	The draft policy considerations will be used to judge detailed planning applications. By this point, the location of the site (i.e. the key determinant of effects on the berough's key commercial assets) will already have been determined.
Health inequalities	∍10 yoar	Sito	Potontial	Indiroct	Yos	4V0	ΛІΙ	Ethnicity / Placo	Min⊹vo	Available evidence suggests that levels of ill health are relatively low, but serious for a minority of families. However, there is a higher level of depression within the Cypsy and Traveller community, compared to the general population. It is likely that mental health issues will, in some ways, be related to social exclusion and the abscense of strong social 'support networks'. Good site design, as promoted through this draft policy approach, can help to ensure good social relations and the development of strong support networks on sites.
Crime	-10 yoar	Sito	Potontial	Indiroct	Yos	:vo	ΛII	Ethnicity / Placo	Min:vo	An approach to landscaping is favoured that "[doos] not enclose and soparate the site so much that it hampers cohesion with the neighbouring softled community". Over the long-form, this may be beneficial in forms of ensuring integration and understanding between softled and travelling communities. In furn, this may help to reduce fear of crime.
Public safety	-10 yoar	Sito	Potential	Diroct	Yos	:vo	ΛII	Ethnicity / Raco		The draft policy approach requires that detailed applications for Cypsy and Traveller sites and Cypsy and Traveller related development should have regard to guidance outlined in 'Designing Cypsy and Traveller Sites - Good Practice Guide'. This guide includes a considerable focus on ensuring on-site health and safety.
Mixed development									Noutral	The draft policy approach will be used to judge detailed planning applications. By this point, a decision will already have been made regarding whether the site should come forward as part of a mixed development.





Table E: Appraisal of the draft policy approach to addressing tenure

SA/SEA Objectives	Boration	ම ලැබුව	Likeliheed	Direct/Indirect/ Commistive	Reversibility	Positiva/Nautral/ Nagetivo	Spatial Distribuiton	Scoial Equily	Signiiiosmos	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
Sustainable Consum	iption 8	k Produ	cuon							No offect
Prosperity			-					•	Noutral	No offect
Access to jobs									Noutral	
Reducing travel							-		Noutral	No offect
Resource efficiency									Noutral	No offect
Climate Change and	Energy	1								
Greenhouse gases	-	-							Noutral	No offect
Business adaptation									Noutral	No offect
Losses from flooding									Noutral	No offect
Urban adaptation									Noutral	No offect
Natural Resource Pr	otection	n & ⊨nv	. Enhand	ement						
Biodiversity						-			Noutral	No offect
Landscape									Noutral	No offect
Green infrastructure	-								Noutral	No offect
Historic environment						-	-	-	Noutral	No offect
Builtenvironment	-								Noutral	No offect
Pollution									Noutral	No offect
Sustainable Commu	nities									
Deprivation	10 yoa	r I.ocal	Potontial	Indiroct	Yos	⊹vo	ΛII	Ethnicity / Raco	Min:vo	Availability of affordable pitches is a key determinent of well-being for Cypsies and Travellers.
Housing	10 yoa	r I.ocal	Likoly	Indiroct	Yos	⊹vo	ΛII	Ethnicity / Raco	Mod:vo	The G&TAN emphasises that there is a strong preference for family-owned small sites. However, it is clear that not all families will be afford the ownership of land, and so there is likely to be a continuing need for social rented sites provided by either local authorities or RSIs. Respondents to a survey performed as part of the G&TAN stated the following in terms of preferred site ownership: - Site owned privately (not family) 33% - Family owned site on own land 28% - Site owned by a council 17% - Doesn't matter 17% - However, the the report notes that these figures under-represent the actual preference for family owned sites.
Commercial Assets									Noutral	No offoct
Health inequalities	10 yoa	r I.ocal	Potential	Diroct	Yos	÷vo	ΛII	Ethnicity / Raco	Min:vo	Availability of affordable pitches is a key determinent of well-being for Cypsies and Travellors.







SA/SEA Objectives	Boration	Scale	Like lihocal	Direct/Indirect/ Completive	Reversibility	Positivo/Noutral/ Nogativo	Spatial Distribution	Secial Equily	Signillo	Justification, Mitigation and enhancement measure (those in Italies are already proposed in the plan)
Crime									Noutral	No offect
Public safety									Noutral	No offect
Mixed development							-		Noutral	No offoct