

Solihull MBC

Independent Examination of:

**The Solihull Gypsy and Traveller Site Allocations Development
Plan Document**

Matters and Issues for Examination

29 November 2013

Contents

	Page
Matter 1 – Legal Requirements and Procedural Matters	1
Matter 2 – The Council’s Strategy for Meeting the Needs of the Gypsy and Traveller Community in Solihull	8
Matter 3 – Specific Allocations	13
Matter 4 – Temporary Stopping Places	17
Matter 5 – Travelling Showpeople	17

Matter 1 – Legal Requirements and Procedural Matters

Q1. Has the Site Allocation Plan been prepared in accordance with the current Local Development Scheme (LDS), including its timetable, content and timescale?

- 1.1. Yes, the Gypsy and Traveller Site Allocations Development Plan Document (DPD) has been prepared in accordance with the Solihull Local Development Scheme (LDS) published in September 2012 (DPD 026). The LDS schedules submission of the DPD to the Secretary of State in July 2013 and the document was formally submitted on 26 July 2013. The Gypsy and Traveller Site Allocations DPD is consistent with the description of its role and content in the LDS.

Q2 – Has the Site Allocation Plan been prepared to comply with the adopted Statement of Community Involvement, allowing for adequate and effective consultation and engagement of the community and all interested parties and meeting the minimum consultation requirements set out in the Regulations?

- 1.2. Yes, the Gypsy and Traveller Site Allocations DPD has been prepared in accordance with the Statement of Community Involvement (SCI) (DPD 025) adopted in February 2007. The SCI indicates that for every planning policy document produced the Council will seek to notify specific consultation bodies and community and stakeholder groups and individuals on its Local Development Framework (LDF) database, and publicise every document so that anyone not on the database has an opportunity to become involved. It sets out a range of methods for advertising opportunities to get involved.
- 1.3. The Statement of Consultation (DPD 027) sets out how the Council has involved consultation bodies, stakeholders and the community, including the specific targeting of the Gypsy and Traveller Community and their representative bodies, in the preparation of the DPD. It explains how the Council has complied with the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.4. The Statement of Consultation sets out for each stage of the preparation of the DPD which organisations were invited to make representations and how, and provides a summary of the main issues raised and how these have been taken into account. Chapter 3 covers the 'Options' consultation (DPD 013), including the methods employed in ensuring effective community involvement and engagement. Chapter 4 relates to the consultation on 'Preferred Options' (DPD 009), which took place from July to September 2012 involving individual notification of stakeholders, press releases and meetings. Chapter 5 relates to the publication of the Submission Draft DPD (DPD 004), with representations invited from 5 April to 17 May 2013, using the same methods of consultation as in previous stages with the addition of a guidance note on the nature of the consultation and a formal press notice published in both the Solihull News and Birmingham Mail to ensure Borough wide coverage.
- 1.5. The Council has considered representations received in response to the various stages of consultation. This is documented in DPD Options – Council's Response to Representations (DPD 016), DPD Preferred Options – Council's Response to Representations and Recommendations (DPD 012), DPD Submission Draft – Council's Response to Representations and Recommendations (DPD 008).

Q3. Has the Site Allocation Plan been subject to Sustainability Appraisal, including a final report on the published plan; and is it clear how the Sustainability Appraisal influenced the final plan and dealt with mitigation measures? Has Appropriate Assessment under the Habitats Directive / Regulations been carried out to the satisfaction of Natural England?

- 1.6. Yes, the Gypsy and Traveller Site Allocations DPD has been subject to Sustainability Appraisal (SA), which has been undertaken throughout the process of preparation including the 'Options', 'Preferred Options' and Submission Draft stages (see DPD 014, DPD 010 and DPD 004 respectively). As a result of the minor changes to the DPD that were proposed between publication of the Submission Draft in April 2013 and formal Submission in July 2013, the Council wrote to the SA consultants for an opinion on what the implications of these minor changes would be on the final SA (DPD 002). The SA consultants outlined the implications of these changes in a letter and Annex (DPD 003) wherein it was concluded that the changes would have a minor positive effect on several of the sustainability objectives defined for appraisal, or would have no impact at all.
- 1.7. The way in which the Sustainability Appraisal has influenced the development of the DPD and the final version of the Plan is outlined within the Submission Draft Sustainability Appraisal (DPD 005).
- 1.8. Sustainability Appraisal has helped to develop the plan from the outset of the process by appraising the objectives of the plan against sustainability objectives to ensure compatibility. It has been used to appraise options and preferred options, including preferred site allocations and this has also included the identification of mitigation measures to address any identified adverse effects. The SA framework has also been used to help to refine policies once drafted to ensure that policies fully reflect sustainability issues.
- 1.9. An appropriate assessment under the Habitats Directive/Regulations has been undertaken (DPD 024). This has concluded that none of the Gypsy and Traveller Site Allocations DPD policies will result in a significant effect on the Natura 2000 network, either alone or in combination with other local plans. Natural England has confirmed that it is satisfied that the assessment's conclusion is robust (see correspondence from Natural England dated 6 March 2013 attached at Appendix 1.)

Q4. Does the Site Allocation Plan have regard to national planning policy, including consistency with the National Planning Policy Framework (NPPF) and the Planning Policy for Traveller Sites (PPTS)? Is there sufficient local justification for any policies that are not consistent with national planning policy? Does the submitted plan properly reflect the presumption in favour of sustainable development in the NPPF?

- 1.10. Yes, the Gypsy and Traveller Site Allocations DPD does have regard to national planning policy, including the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS).
- 1.11. PPTS has an overarching aim to ensure fair and equal treatment for Travellers in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. Other aims of the policy include local authorities making

their own assessment of need for the purposes of planning and meeting this need through the identification of land for sites. This is what the DPD seeks to achieve.

- 1.12. The Soundness Self Assessment Checklist (January 2013) prepared by the Planning Advisory Service has been completed by the Council which includes sections on compliance with the NPPF and PPTS (see attached at Appendix 2). The Council is confident that the policies in the Plan are consistent with NPPF and the PPTS.
- 1.13. The Council recognises that all of its proposed site allocations are in the Green Belt and that Gypsy and Traveller sites constitute inappropriate development which should not be approved (on a planning application), except in very special circumstances. However, the Council considers that there are exceptional circumstances which exist to justify site allocations in the Green Belt in Solihull.
- 1.14. Although the Council has taken a proactive approach to meeting the need for Gypsies and Travellers in the Borough and has been granting planning permission for sites over the last few years, as in most other areas of the Country, there remains an identified unmet need for pitches in Solihull which the DPD seeks to address. The Council considers that the shortage of Gypsy and Traveller sites in the Borough, the fact that Solihull has an identified unmet need for pitches, and evidence that there are no alternative sites available outside the Green Belt constitute exceptional circumstances to justify the allocation of sites in the Green Belt.
- 1.15. Together with the policies in the emerging Solihull Local Plan (particularly Policy P6 – Provision of Sites for Gypsies and Travellers), the DPD does reflect the presumption in favour of sustainable development in the NPPF. In accordance with paragraph 14 of the NPPF, the preparation of a Gypsy and Traveller Site Allocations DPD demonstrates the Council's commitment to positively seeking opportunities to meeting the development needs of Gypsies and Travellers in its area. The Policies within the DPD, along with those in the emerging Solihull Local Plan, also provide opportunities to meet the assessed identified accommodation needs of Gypsies and Travellers in the Borough, whilst seeking to bring forward the most appropriate sites, as well as respecting the interests of the settled community.

Q5. Does the Local Plan have regard to the Sustainable Community Strategy, and aligned its key spatial planning objectives with the priorities identified in this strategy?

- 1.16. Yes, the Gypsy and Traveller Site Allocations DPD has regard to the Sustainable Community Strategy (SCS) (NRP 6).
- 1.17. Paragraph 1.1.3 of the DPD Submission Document (DPD 001) refers to the SCS which includes as one of 4 priorities for improvement, 'building prosperous communities'. Within this priority is ensuring that everyone has a decent home and that new housing meets the needs of the whole community. Paragraph 5.3.3 of the DPD states that the challenges, vision and objectives outlined will ensure that the DPD contributes to the implementation of the SCS for Solihull. The way in which the objectives of the DPD meet the priorities for improvement in the SCS are summarised in Table 1 below.

Table 1: DPD Challenges / Vision / Objectives and Linkages with the Solihull Sustainable Community Strategy

		Sustainable Community Strategy: Priorities for Improvement							
DPD Objectives	Objectives (section 5.3 of the DPD):	Building Healthier Communities		Building Safer Communities		Building Stronger Communities		Building Prosperous Communities	
			Priority		Priority		Priority		Priority
	Increase the number of authorised pitches in the most appropriate locations, reduce the number of unauthorised developments and encampments and enable Gypsies and Travellers to access the services and facilities to meet their needs, whilst respecting the interests of the settled community.	✓	1.1 1.2 1.3	✓	2.3	✓	3.1 3.2 3.4 3.5	✓	4.2 4.3 4.5 4.6 4.7 4.8
	Identify sites that are available and achievable			✓	Priority 2.3	✓	Priority 3.4	✓	Priority 4.6
	Allocate and grant planning permission for sufficient land and pitches to meet identified needs within Solihull Borough in the most appropriate locations			✓	Priority 2.3	✓	Priority 3.2 3.4	✓	Priority 4.2 4.3 4.5 4.6 4.8
	Increase access to local services and facilities including health, education, fresh food and employment by allocating sites and pitches in the most suitable locations to enable this	✓	Priority 1.1 1.2 1.3			✓	Priority 3.4 3.5	✓	Priority 4.5 4.6 4.7 4.8
	Ensure sites are of high quality design, safe and pleasant places to live	✓	Priority 1.1 1.2			✓	Priority 3.2	✓	Priority 4.2 4.6
	Provide clear guidance for making decisions on planning applications regarding Gypsy and Traveller sites					✓	Priority 3.1 3.2	✓	Priority 4.2 4.6

Q6. Does the Site Allocation Plan comply with the Local Development Regulations, including preparation, content and publishing and making available the prescribed documents?

- 1.18. Yes, the Council is confident that the DPD complies with the Local Development Regulations and the Statement of Consultation (DPD 027) provides more specific detail on the process the Council went through and the consultees that were consulted.
- 1.19. In accordance with regulation 18 of The Town and Country Planning (Local Planning) England Regulations 2012 (hereafter referred to as ‘the Regulations’) the Council consulted on a Gypsy and Traveller Site Allocations DPD ‘Options’ paper seeking views on how the future accommodation needs of Gypsies and Travellers in Solihull could be met. Similarly ‘Preferred Options’ were also consulted on in accordance with regulation 18. Specific consultation bodies as defined by the Regulations were consulted, as well as over 1000 general consultation bodies and other stakeholders which included representatives of Gypsies and Travellers and the Gypsy and Traveller community themselves.
- 1.20. In April 2013 the Council published the Gypsy and Traveller Site Allocations Submission Draft DPD in accordance with regulation 19 of the Regulations. Representations were invited for a statutory period of 6 weeks between 5 April and 17 May 2013 to seek views on whether the Submission Draft DPD was legally compliant and sound. The proposed submission documents (the Submission Draft DPD, Sustainability Appraisal, Statement of Consultation, supporting and background information and Statement of Representations Procedure) was made available in accordance with regulation 35 of the Regulations. Specifically:
- All proposed submission documents (including response forms and guidance notes) were made available at the Council’s principal offices (Solihull, Shirley, Chelmsley Wood and Balsall Common Connect Centres);
 - A copy of the Submission Draft DPD, Statement of Representations Procedure and a CD of supporting and background information including the Statement of Consultation were made available at all libraries in the Borough;
 - Publication of all proposed submission documents (including response forms and guidance notes) were available on the Council’s website throughout the consultation period, together with a statement that the documents were available for inspection and the places and times at which they could be inspected;
- In addition:
- Specific and general consultation bodies, along with other stakeholders were informed and sent a copy of the Statement of Representations Procedure and statement of the fact that the documents were available for inspection and of the places and times at which they could be inspected;
 - Notice was given by local advertisement in the Birmingham Mail on 4 April 2013 and the Solihull News on 5 April 2013, which set out the statement of representations procedure and statement of the fact that the documents were available for inspection and of the places and times at which they could be inspected.
- 1.21. The Gypsy and Traveller Site Allocations DPD was submitted under regulation 22 of the Regulations on 26 July 2013. In accordance with that regulation copies of the DPD Submission document, the Sustainability Appraisal, Statement of Consultation, copies of all

representations made in accordance with regulation 20 and all supporting and background information (see DPD 001 to DPD 029) were submitted in paper form and electronically to the Secretary of State.

1.22. Once the documents were submitted to the Secretary of State, the Council:

- Gave notice to the general and specific consultation bodies, along with other stakeholders invited to make representations under regulation 18 that the DPD had been submitted and of the places and times where the relevant documents were available for inspection;
- Gave notice to others who, over the course of the preparation of the DPD, had requested to be notified of its submission;
- Made the documents outlined above available for inspection at Solihull, Shirley, Chelmsley Wood and Balsall Common Connect Centres, made hard copies of the Submission Document and electronic copies of all supporting information available at all libraries, and published the documents on the Council's website, in accordance with Regulation 35.

Q7. Has the Site Allocation Plan been prepared in accordance with the Duty to Co-operate and does it fully meet this legal requirement?

1.23. Yes, the DPD has been prepared in accordance with the Duty to Co-operate and the Council considers that it has fully met this legal requirement.

1.24. Section 2.7 of the Gypsy and Traveller Site Allocations Submission Document (DPD 001) sets out how the Council has engaged in the duty to cooperate with regard to preparation of the DPD.

1.25. The Council has consulted and actively engaged with neighbouring authorities and other duty to cooperate bodies in the preparation of the DPD. The 2008 Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken jointly with Birmingham and Coventry City Councils so an awareness of cross boundary issues was already available during the early part of the preparation of the DPD.

1.26. In 2011 the Council commissioned an update of its GTAA to ensure that the DPD and policy decisions were based on robust and up to date evidence. In the spirit of cooperation, the Council explored joint working with neighbouring authorities to update the GTAA. However, a number of authorities had already commenced independent updates of their Gypsy and Traveller evidence base and the Council therefore considered collaboration with neighbouring authorities (Birmingham, Warwick and Coventry) that had not updated their own evidence base. At that time, all 3 authorities were not in a position to undertake this work and differing timescales and priorities resulted in Solihull undertaking an independent update of its own evidence base. This was considered to be the most appropriate way forward to avoid undue delay in progressing the Site Allocations DPD. However, in updating the evidence base for Solihull a number of data sources were drawn on including previous assessments of need and information submitted through the previous regional planning process.

1.27. Throughout preparation of the DPD the Council has continually focussed on meeting the Borough's identified pitch requirements within the Borough and it is not relying on any other authority to take any of its need. Similarly, Solihull has not been asked to help meet the Gypsy and Traveller accommodation needs of any other neighbouring authority. Warwick

District Council previously wrote to all neighbouring authorities expressing concern that they would not be able to provide fully for their 5 year requirement within their district (see letter attached at Appendix 3). Solihull responded and advised that there is no spare capacity within the Borough to contribute to Warwick's requirements and Warwick District Council have not pursued the issue any further. However, Solihull recognise that the duty to cooperate is an on-going process and in responding to Warwick (see letter attached at Appendix 4) the Council emphasised its commitment to continued consultation and engagement with neighbouring authorities to share information and explore how the needs of the Gypsy and Traveller community could be better understood.

1.28. Notwithstanding this, the DPD is making allocations in accordance with Policy P6 of the emerging Solihull Local Plan. The Planning Inspector conducting the examination concluded at paragraph 8 of his Report on the Examination into the Solihull Local Plan Development Plan Document (14 November 2013) that "...there are no specific or agreed requirements for Solihull to meet any of the housing or other needs of adjoining authorities, or for any neighbouring authorities to meet any of Solihull's housing or other needs". At paragraph 13 of his report, the Inspector concludes that the legal requirements of the Duty to Co-operate have been met.

1.29. Therefore, the Council consider that a substantial part of the duty to co-operate has been discharged through the local plan process in any event. If this were not the case, the overall pitch numbers in Policy P6 of the emerging Local Plan would have required modification to allow for any additional or reduced need in the Borough. This was not the case as Solihull is not expecting any neighbouring authority to accommodate any of its future need and it is not expecting to accommodate the need of any neighbouring authority. In addition, no other authority has objected to either the emerging Solihull local plan or the Site Allocations DPD on the basis that our identified pitch requirements need to be amended.

Q8. A number of recommended changes are put forward by the Council post Submission Draft Publication as set out in DPD 008 'Council's Response to Representations and Recommendations for the Gypsy and Traveller Site Allocations Development Plan Document' (June 2013). These have been incorporated in the Submission Document (July 2013). What is the position on these changes including any further arrangements for any further public consultation and / or sustainability appraisal considered necessary?

1.30. The Council consider that the changes put forward post Submission Draft Publication are minor and fall within the category of 'additional modifications'. The Council does not believe that consultation is required for these proposed changes as they are not considered to be significant or relate to the fundamental soundness of the DPD. Therefore no arrangements for any further public consultation are proposed. However, if the Inspector takes a contrary view, consultation will be undertaken after the hearings alongside any other 'main modifications' that may be proposed.

1.31. With regard to the Sustainability Appraisal and the minor changes to the DPD that were proposed between publication of the Submission Draft in April 2013 and formal Submission in July 2013, the Council wrote to the SA consultants for an opinion on what the implications of these minor changes would be on the final SA (DPD 002). The SA consultants outlined the implications of these changes in a letter and Annex (DPD 003) where it was concluded that the changes would have a minor positive effect on several of the sustainability objectives

defined for appraisal, or would have no impact at all. These changes have therefore already been addressed by the Sustainability Appraisal.

- 1.32. A schedule of changes to the DPD that were made between Submission Draft in April 2013 and formal submission to the Secretary of State in July 2013 is attached at Appendix 5.

Matter 2 - The Council's strategy for meeting the needs of the Gypsy and Travelling community in Solihull.

Policy P6 of the Solihull Local Plan Development Plan Document sets out the number of pitches required to meet the accommodation needs of gypsies, travellers and travelling showpeople.

Q1. Have any modifications been suggested to Policy P6 or other policies, as part of the Examination of the Development Plan Document that may be relevant to the examination of the Site Allocation Plan?

- 2.1. In July and August 2013 the Council consulted on main modifications to the Solihull Draft Local Plan. The main modifications were categorised into 4 areas:
 1. **Pre-Submission to Submission** – main modifications made after the pre-submission period of representation to the Draft Local Plan (March 2012) and prior to the submission of the Draft Local Plan for examination (September 2012).
 2. **Submission to Hearings** – main modifications made after the submission of the Draft Local Plan for examination (September 2012) and prior to commencement of the hearing sessions (January 2013)
 3. **Hearing Sessions** – main modifications made as a consequence of the hearing sessions (from January 2013)
 4. **Interim Conclusions** – main modifications as a consequence of the Inspector's Interim Conclusions (April 2013)
- 2.2. Policy P6 'Provision of Sites for Gypsies and Travellers' is included as a category 1 main modification. Changes to Policy P6 were made after the pre-submission period of representation to the Draft Local Plan in March 2012 but prior to the submission of the Draft Local Plan for examination in September 2012. The reason for this change was to ensure the policy and associated justification was up to date to reflect the 2012 GTAA (as opposed to the 2008 GTAA) and provide more clarity and certainty to the policy. Main modifications made under this category were already contained within the Draft Local Plan when it was formally submitted and were therefore considered by the Inspector as part of the examination in any event.
- 2.3. With regard to Policy P6, the Inspector did not engage in any detailed discussion of the Policy at the Draft Local Plan hearing sessions in January 2013, other than minor points of clarification. No further changes to Policy P6 were therefore required as a result of the hearing sessions or the Inspector's Interim Conclusions. However, as the change had not previously been formally consulted on, the Inspector considered it appropriate to include it as a 'main modification'.

- 2.4. Consultation on the main modifications generated one objection to Policy P6. The objection and the Council's response is attached at Appendix 6. At the resumed hearing sessions following the main modifications consultation, the Inspector had no further questions on this modification. In his Report on the Examination into the Solihull Local Plan Development Plan Document the Inspector concluded that the amended policy P6 would enable the identified needs of Gypsies and Travellers to be met, provide the strategic context for site-specific provision in the Gypsy and Traveller Site Allocations DPD, consistent with the latest national policy and ministerial statements, and is soundly based, effective, justified and appropriate for Solihull.
- 2.5. The Council do not therefore consider that the modification proposed to Policy P6 affects the examination of the Site Allocations DPD in any way and Policy P6 still provides the overall context and Policy framework for the DPD. There have been no modifications to any other policies that are considered relevant to the examination of the Site Allocations DPD.

Sites in the Green Belt

All of the proposed allocated sites are situated in the Green Belt where there is a presumption against inappropriate development. The Government's aims in respect of traveller sites are set out at paragraph 4 of the PPTS and state 'that plan-making and decision-taking should protect Green Belt from inappropriate development'. On 1 July 2013 a Written Ministerial Statement to Parliament was issued, primarily relating to traveller sites in the Green Belt.

Q2. Is the identification of sites in the Green Belt the most appropriate strategy, when considered against all reasonable alternatives?

Q3. What other alternatives have been considered?

- 2.6. The Council's overall strategy for meeting the accommodation needs of Gypsies and Travellers is not specifically about the identification of sites in the Green Belt.
- 2.7. As outlined in Section 6 of the DPD submission document, the strategy for meeting the Borough's identified need for permanent residential pitches to 2027 focuses on a combined approach involving:
- Allocation of new sites
 - Extensions to existing authorised sites
 - Increasing capacity at existing authorised sites
 - Examining whether existing, well established authorised sites, which do not benefit from full planning permission are suitable to be regularised
- 2.8. This strategy maximises the opportunity for a wide variety and type of site options to be considered and assessed without relying on a single means of provision.
- 2.9. The alternative to this combined approach was to consider the allocation of sites and meet the need for pitches based on a single means of provision; for example allocate new sites only, or focus solely on increasing capacity, extending existing sites or regularising existing unauthorised sites. However, this could put the Borough at risk of not meeting its identified need for Gypsy and Traveller accommodation due to an overall lack of sites or the fact that sites do not meet the assessment criteria. If the strategy was to take forward just one or two

approaches to meeting future pitch requirements, it could immediately discount some sites that may perform well against the site assessment criteria. It is considered that without adopting a combination approach, the variety and choice of site options for Gypsies and Travellers would be limited.

- 2.10. As part of the process of identifying site allocations, a 'call for sites' exercise was undertaken. The sites suggested to the Council through the 'call for sites' included new sites, extensions to existing authorised sites and increases in pitch numbers on existing sites. All sites suggested to the Council were in the Green Belt and no sites could be identified on land outside the Green Belt. The Council also resolved to look at existing unauthorised sites in the Borough to see if they would be suitable for meeting the need identified, providing they met the assessment criteria. These sites were also in the Green Belt.
- 2.11. An alternative to allocating sites in the Green Belt would be to allocate land outside the Green Belt in Solihull; however, as no land could be identified, sites would not be deliverable and the plan would be unsound. A further alternative would be to seek to allocate sites outside Solihull in the non-Green Belt area of neighbouring authorities; however, this was not considered to be a sustainable or reasonable option and it was not an approach that was pursued for general housing allocations in the emerging Solihull Local Plan. The Council did not therefore consider these approaches to constitute reasonable alternatives to the allocation of sites within the Green Belt in Solihull.
- 2.12. In accordance with Policy P6, which requires other locations to be considered before sites in the Green Belt can be permitted, the evidence demonstrates that there is no land that can be identified outside the Green Belt for allocation as Gypsy and Traveller sites in Solihull. As outlined above in the response to Matter 1 – question 4, the Council considers that there are exceptional circumstances which exist to justify site allocations in the Green Belt in Solihull as there is currently an identified unmet need for pitches in Solihull and a demonstrable lack of available, deliverable sites outside the Green Belt. However, the site assessment process has sought to ensure that despite the lack of alternative options, Solihull is able to meet its own need within its own area and that only the most appropriate sites are brought forward.
- 2.13. The strategy that the Council has adopted is therefore considered to be the most appropriate when considered against all reasonable alternatives.

Q4. Is this approach justified and supported by robust evidence?

- 2.14. Yes, the approach adopted by the Council is justified and supported by robust evidence. The Borough is significantly constrained given that the non-urban area of the Borough is all Green Belt and as outlined above, no Gypsy and Traveller sites have been suggested or could be identified on any land outside the Green Belt in Solihull. All existing authorised sites in the Borough are also in the Green Belt and in paragraph 5.1.2 of the DPD Submission document (DPD 001) the difficulties of securing Gypsy and Traveller accommodation in the urban area are identified as a challenge to address. Land values in the urban area of Solihull are high which makes it very difficult for Gypsies and Travellers to secure accommodation which is financially viable and therefore deliverable. In addition, mainstream residential and other uses that were considered for allocation through the Solihull Local Plan were identified through a site proposal form which allowed proposed land uses to be specified. No site proposal forms were received which proposed any brownfield land or sites in the urban area

to accommodate Gypsies and Travellers. Therefore, it is unlikely that Gypsy and Traveller pitches in such locations would be deliverable or achievable.

Scale of sites

Q5. Does the size of the proposed (resultant) sites, in terms of the resultant number of pitches, reasonably and effectively reflect the accommodation needs identified in the GTAA?

2.15. Yes, the size of sites, number of pitches proposed and location of sites does reasonably and effectively reflect the accommodation needs identified in the GTAA.

2.16. The GTAA considers the accommodation need between 1st January 2012 and 31st December 2016 as follows:

- Temporary planning permissions, which will end over the assessment period
- Concealment of households
- Allowance for family growth over the assessment period
- Need for authorised pitches from families on unauthorised developments
- Movement over the assessment period between sites and housing
- Whether the closure of any sites is planned
- Potential need for residential pitches in the area from families on unauthorised encampments
- Movement between areas

2.17. The GTAA revealed that the residential pitch need for Solihull between 2012 and 2017 is 26 pitches. This need arises as follows:

Element of Supply and Need	Pitches
End of temporary planning permissions	1
Concealed households	4
New household formation	5
Unauthorised developments	14
Net movement from housing to sites	2
Closure of sites	0
Unauthorised encampments	0
Movement between areas	0
Total	26

2.18. In order to establish residential need over the longer term, an assumed rate of household growth was applied. In Solihull a locally responsive assessment of household growth rate of 2% was employed, which resulted in a residential need of 6 pitches between 2017 - 2022 and 6 pitches between 2022 – 2027. The total pitch requirement for the 15 year period between 2012 and 2027 therefore equates to 38 pitches.

2.19. The DPD seeks to meet this numerical requirement for pitches, as identified in the evidence base, through bringing forward the most appropriate sites when considered against the assessment criteria. However, the DPD also seeks to provide choice and variety in the site options available for Gypsies and Travellers in terms of tenure and site size. For example, the DPD proposes a mix of privately owned / occupied sites and sites that are available for both

private and social rent. In terms of site sizes, the DPD proposes a mix of sites that are capable of accommodating new household formation and concealed households (through, for example, small extensions to existing authorised family sites and regularisation of sites without full planning permission), and addressing the supply issues that arise from unauthorised developments, net movement from housing to sites and the end of temporary planning permissions (through, for example, providing private sites, privately rented sites and socially rented sites that are large enough to accommodate one or more family groups wishing to stay together).

2.20. The DPD is therefore proposing a range of sites to meet identified need, as well as providing options for private or social rent. The Council therefore considers it is meeting its required pitch numbers, as well as reflecting the range of accommodation needs on a practical basis.

Community safety

Q6. Should Policy GTS1 require the design of sites to promote community safety and social cohesion through measures such as natural surveillance?¹

- 2.21. Yes, the Council considers that the design of sites should promote community safety and social cohesion, particularly as paragraph 11 of PPTS states that Gypsy and Traveller sites should be sustainable economically, environmentally and socially. Paragraph 58 of the NPPF also states that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- 2.22. The addition of wording to Policy GTS 1 requiring the design of sites to promote community safety and social cohesion through measures such as natural surveillance, supports these national policy principles. In particular, when considering planning applications paragraph 24 (d) of PPTS requires local planning authorities to attach weight to not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community. The wording also supplements Policy P15 of the emerging Solihull Local Plan which requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime.
- 2.23. The Council works closely with the police on Gypsy and Traveller issues in Solihull and in responding to consultation on the DPD Submission Draft, the Police and Crime Commissioner for the West Midlands (PCCWM) objected to the lack of reference to matters of security and safety or mitigation measures which might be required to ensure that crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Previous consultation responses to the DPD from the Police, as well as information gleaned from working together on other Gypsy and Traveller related matters in the Borough, has also highlighted the existence of community and social cohesion issues within and between Gypsy and Traveller communities and the settled community in Solihull.
- 2.24. In view of the Police's local knowledge and experience of Gypsy and Traveller issues in the Borough, and having considered representations from the PCCWM, the Council are keen to

¹ An amendment incorporated in the Submission document in light of responses to the Submission draft Publication (See Matter 1 - Q8)

continue working in partnership to ensure that sites are socially sustainable. Therefore, it is considered that social sustainability and community cohesion are locally specific issues in Solihull that justify a specific policy reference in the DPD, over and above that of national planning policy and Policy P15 of the emerging Solihull Local Plan.

- 2.25. Paragraph 5.3.2 of the DPD submission document includes an objective to ensure sites are of high quality design, safe and pleasant places to live. It is therefore considered that the addition of a reference in GTS 1 to promote community safety and social cohesion through measures such as natural surveillance on site ensures that this objective is followed through into policy in the DPD.

Matter 3 – Specific Allocations

Q1. Can the proposed allocated sites each deliver and reasonably accommodate the number of pitches proposed given the constraints that exist on these sites and the various policy requirements that need to be satisfied including impact on local wildlife sites, flooding matters, tree preservation orders etc?

- 3.1. Yes. The DPD proposes four site allocations; however, since formal submission of the document in July 2013, two of the proposed allocations – Old Damson Lane (GTS 2) and The Uplands (GTS 4) – have received planning permission. Therefore, with regard to these two sites, the Council have been satisfied that they can deliver and accommodate the number of pitches proposed given the constraints that exist on the sites and the policy requirements that needed to be satisfied.
- 3.2. The other site allocations proposed in the DPD are The Warren (GTS 3) and The Haven (GTS 5). The overall assessment process undertaken for each site sought to establish the general principle of whether the sites were suitable for development as well as identify any potential constraints. The assessment process did not address specific detailed impacts as it was considered that any future planning application would need to address these and identify the mitigation measures that may be required. This is consistent with the approach adopted for mainstream housing and employment allocations within the emerging Solihull Local Plan.
- 3.3. However, in response to this question, the Council has undertaken further work to demonstrate that the number of pitches can be accommodated at the Warren and the Haven, given the constraints that have been identified.
- 3.4. With regard the Warren, the constraints relate to the fact that the site is adjacent to a Local Wildlife Site and that Tree preservation Order trees are present on site. A feasibility study has been undertaken by the Council to show (for the purposes of demonstration) that 5 pitches can be physically accommodated in the extended area (see Appendix 7). A short ecological appraisal has also been undertaken on behalf of the Council (see Appendix 8) which recommends that the Warren is taken forward as a site allocation as it is unlikely to have any long term significant ecological or geological impacts. Notwithstanding this, at the time of writing a planning application has also been submitted to the Council by the owners of the Warren for 5 additional pitches on the proposed site allocation. Although the application has not yet been validated due to additional information being required, the applicant has confirmed that an arboricultural assessment and ecological survey have been commissioned in accordance with policy in the DPD.

3.5. With regard the Haven, the constraints relate to the fact that the site is approximately 250m from Castle Hill Farm Meadows Local Wildlife Site. As with the Warren, a short ecological appraisal has also been undertaken on behalf of the Council (see Appendix 9) which recommends that an extension to the Haven is taken forward as an allocated site as it is unlikely to have any significant ecological or geological impacts and that the site is also unlikely to support protected species. In addition, a feasibility study has also been undertaken by the Council to show (for the purposes of demonstration) that 12 pitches can be physically accommodated on the proposed site allocation (see Appendix 10).

Q2. Is the Site Allocation Plan consistent with National Policy? In particular, Policy B of the PPTS requires that local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies, amongst other criteria, provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well being of any travellers that may locate there or on others as a result of new development. Old Damson Lane and The Haven are in close proximity to Birmingham Airport.

(a) Will these sites provide a reasonable standard of living conditions for future occupiers?

(b) Is the allocation of these sites the most appropriate strategy when considered against the reasonable alternatives?

3.6. The site allocations DPD is consistent with national policy and the PPTS. As highlighted above in the response to Matter 1 – Q4, the Council has completed the Soundness Self Assessment Checklist (January 2013), which includes sections on compliance with the NPPF and PPTS (see attached at Appendix 2). The Council is therefore confident that the policies in the Plan are consistent with NPPF and the PPTS.

3.7. In accordance with the PPTS the assessment criteria in Policy P6 of the emerging Solihull Local Plan and the more detailed issues that each criterion encompasses (as highlighted at Appendix 1 of the DPD Submission Document (DPD 001)) seek to ensure that sites are sustainable economically, socially and environmentally. How each of the assessment criteria are relevant to Policy B the PPTS is set out in the following table:

Policy P6 Criteria	Planning Policy for Traveller Sites Policy B: Key Links
i. The size and scale of the site and the number of caravans stationed is appropriate to the size and density of the local settled community	Paragraph 9: point (d) Paragraph 11: points (a), (f)
ii. Any unacceptable adverse visual impact can be adequately minimised	Paragraph 9: point (e) Paragraph 11: point (a)
iii. The site is not in an area prone to flooding	Paragraph 11: point (g)
iv. Any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or the historic environment can be mitigated	Paragraph 9: point (e) Paragraph 11: point (a), (e)
v. There is no unacceptable adverse impact on privacy and residential amenity for both site	Paragraph 11: point (a), (e)

residents and neighbouring land uses	
vi. The site has safe and convenient access to the highway network	Paragraph 11: point (a) Paragraph 11: point (f)
vii. Local services and facilities such as schools, health facilities, fresh food and employment are accessible by walking, cycling and public transport, or it can be demonstrated that the site is sustainable in other ways.	Paragraph 11: point (a), (b), (c), (h)

- 3.8. The criteria also seek to address some of the wider problems facing the Gypsy and Traveller community such as poor health and education outcomes and other quality of life and social exclusion issues, as well as protecting the interests of the settled community.
- 3.9. As outlined above, in response to Matter 3 - question1, the site allocation proposed at Old Damson Lane has recently been granted planning permission. In granting planning permission the Council were satisfied that the site would provide a reasonable standard of living conditions for future occupiers.
- 3.10. With regard to the Haven, predicted noise contour maps for 2030 submitted with the planning application for Birmingham Airport's runway extension show that the area identified for the Haven's site extension is further away from the higher (69 dB(A) LEQ) noise contour than the existing site, which did not require relocation as part of the airport's future growth plans. In addition, the Birmingham Airport Noise Action Plan 2010 – 2015 acknowledges that today's aircraft are anticipated to be replaced by even quieter models in the future.
- 3.11. The owner of the Haven (who is also resident on site) is promoting the site as an allocation. He has raised no issue with regard to noise impact and maintains that the existing site is full, with a waiting list in place.
- 3.12. On balance, and compared to other potential sites that were assessed through the DPD process, the proposed allocation at the Haven performs well when considered against the assessment criteria as a whole. The number of sites the Council had the opportunity to assess was relatively small and as such all sites were considered on an individual basis which enabled a comparison of the merits and shortcomings of each site to be made. The issues on every site were different and the criteria were not weighted but the performance against the criteria as a whole was considered. The reasoning behind why sites were rejected or taken forward is provided in the Site Assessments document (DPD 018) and is outlined in the DPD Preferred Options document (DPD 009) which was subject to consultation and sustainability appraisal.
- 3.13. The allocation of the Haven is therefore considered to be the most appropriate site when considered against reasonable alternatives.

Q3. Is the Site Allocation Plan sufficiently flexible to address the accommodation needs of gypsies and travellers, ensure delivery and monitoring?²

² An amendment is incorporated in the Submission document to replace text in paragraph 9.1.2 of the Submission Draft (See Matter 1 – Q8)

- 3.14. Yes, it is considered that the DPD is sufficiently flexible to address the accommodation needs of Gypsies and Travellers, ensure delivery and monitoring.
- 3.15. Paragraph 7.3.1 of the DPD proposes phasing to help secure the delivery of Gypsy and Traveller pitches throughout the plan period and ensure that all sites do not come forward early in the plan period, thus leading to a lack of sites in the latter part of the plan period to meet the need which has been identified as not arising immediately. A phased approach to the allocation of sites also has the added benefit of enabling sites to be brought forward should any identified sites or pitches fail to materialise for any reason.
- 3.16. Policy P6 of the emerging Solihull Local Plan also makes provision for any identified unmet need for pitches to be met through the planning application process. In addition, the GTAA will be updated after a period circa 5 years (as recommended in Government guidance on GTAA), which may then in turn also trigger a review of the Site Allocations DPD.
- 3.17. Section 9 of the DPD sets out the Council's approach to delivery and monitoring and 3 monitoring indicators are identified which will assess whether that the Council is meeting its identified need for pitches over the plan period and seeing a reduction in the number of unauthorised developments and encampments.
- 3.18. The Council considers that alternative approaches are available to ensure the plan is flexible enough to deal with identified need not being met in accordance with the delivery and monitoring indicators identified.

Policy GTS6 - Detailed Planning Considerations and Safeguarding

Q4. Should the policy refer to the need to promote community safety and social cohesion through measures such as natural surveillance?³

- 3.19. Yes, the Council considers that the design of sites should promote community safety and social cohesion, particularly as paragraph 11 of PPTS states that Gypsy and Traveller sites should be sustainable economically, environmentally and socially. Paragraph 58 of the NPPF also states that planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
- 3.20. The addition of wording to Policy GTS 6 requiring proposals for development to promote community safety and social cohesion through measures such as natural surveillance, supports these national policy principles. In particular, when considering planning applications paragraph 24 (d) of PPTS requires local planning authorities to attach weight to not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community. The wording also supplements Policy P15 of the emerging Solihull Local Plan which requires development proposals to create safe and attractive streets and public spaces, which reduce crime and the fear of crime.
- 3.21. As referred to above in the response to Matter 2 – Q6, the Council works closely with the police on Gypsy and Traveller issues in Solihull. In response to previous consultations, as well

³ An amendment incorporated in the Submission document in light of responses to the Submission draft Publication (See Matter 1 - Q8)

as information gleaned from working together on other Gypsy and Traveller related matters in the Borough, the existence of community and social cohesion issues within and between Gypsy and Traveller communities and the settled community in Solihull has been highlighted.

- 3.22. In view of the Police's local knowledge and experience of Gypsy and Traveller issues in the Borough, and having considered representations from the PCCWM, the Council are keen to continue working in partnership to ensure that sites are socially sustainable. Therefore, it is considered that social sustainability and community cohesion are locally specific issues in Solihull that justify a specific policy reference in the DPD, over and above that of national planning policy and Policy P15 of the emerging Solihull Local Plan.
- 3.23. Paragraph 5.3.2 of the DPD submission document includes an objective to ensure sites are of high quality design, safe and pleasant places to live. It is therefore considered that the addition of a reference in GTS 6 to promote community safety and social cohesion through measures such as natural surveillance on site ensures that this objective is followed through into policy in the DPD.

Matter 4 – Temporary Stopping Places

Q1. Will the suggested policy for temporary stopping places be effective in delivering sites?

- 4.1. Yes, the Council is confident that once the policy is in place, it will facilitate the delivery of sites by giving additional encouragement and support for landowners to make land available.
- 4.2. Although the 2012 GTAA did not identify the need for temporary stopping places as a particularly pressing issue, the aim of Policy GTS 1 is to provide guidance to facilitate the identification of a site. The council has been, and continues to look for a site that could provide Gypsies and Travellers who may be passing through the Borough a short term alternative to stopping unlawfully or parking on unsafe or inappropriate land. Appendix 11 demonstrates the Council's commitment to undertaking a search for sites that may be suitable as temporary stopping places.
- 4.3. Although the delivery of such a site will be largely dependent on the identification of land that meets the criteria in Policy GTS 1, the Council will continue to actively seek to identify a site that is suitable for this use. The DPD established the Council's commitment to accommodating Gypsies and Travellers in transit temporarily, and ensures that when a site is found, there is a policy framework in place for such a use.

Matter 5 – Travelling showpeople

Q1. Has sufficient regard been made to the accommodation needs of travelling showpeople and how these are to be monitored and addressed in the wider area?

- 5.1. Yes, the Council considers that sufficient regard has been made to the accommodation needs of Travelling Showpeople.
- 5.2. With regard to provision for Travelling Showpeople, the 2012 GTAA identifies that there are no Travelling Showpeople living in Solihull, implying that there is a nil level of need. The 2008 GTAA also identified no Travelling Showpeople resident in Solihull. No planning applications have ever been made for a Travelling Showpeople site in the Borough and there have never

been any showpeople present at any of the 6-monthly caravan counts. In accordance with PPTS which emphasises using evidence to support the planning approach, it is clear that both current and historic evidence indicates that there is no requirement for a Travelling Showpeople site in Solihull. Similarly, in neighbouring authorities that have updated their GTAA's (Warwick and Stratford-upon-Avon Districts), there is also no requirement for a Travelling Showpeople site. Notwithstanding this, both the Solihull and Warwick GTAA's state that further work *may* need to be produced across local authority boundaries to accurately understand the accommodation needs of this group. Solihull would be happy to participate in cross boundary work with other authorities should their updated evidence bases indicate a requirement for the needs of Travelling Showpeople to be met across a wider area.

- 5.3. PPTS emphasises the need to plan using evidence and the Council is confident that this has been done with regard to Travelling Showpeople.

Appendix 1

Date: 06 March 2013
Our ref: 79106
Your ref: Gypsy & Traveller sites



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BY EMAIL ONLY

Dear Mr Docker

Planning Consultation: Habitat Regulations Appropriate Assessment Stage 1: Additional screening to consider Gypsy and Traveller Site Allocations Development Plan Document

Thank you for your consultation on the above document which was received by Natural England on 20 February 2013

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to provide comments on the Habitats Regulations Assessment additional screening report, as a statutory consultee and specialist adviser on the application of the Conservation of Habitats and Species Regulations 2010, the 'Habitats Regulations.'

In general we consider that the screening report uses robust methodology and has fully considered the potential impacts on the identified Natura 2000 sites. We agree with the conclusions of the report that the Gypsy and Traveller site allocations DPD Preferred Options will result in no likely significant effects, either alone or in combination, on the identified sites, and therefore no further recommendations for Appropriate Assessment were necessary.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Roslyn Deeming
Land Use Adviser

Appendix 2

Soundness Self-Assessment Checklist (January 2013)

This note was prepared by AMEC on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’ “, namely that it is:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

Soundness Self-Assessment Checklist (January 2013)

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Positively Prepared: <i>the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i></p>		
<p>Vision and Objectives</p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>Gypsy and Traveller Site Allocations Development Plan Document (DPD) Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 1 – Introduction • Chapter 5 – Challenges, Vision and Objectives • Chapter 7 – Site Allocations • Chapter 8 – Detailed Planning Considerations and Safeguarding • Chapter 9 – Delivery and Monitoring <p>Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020)</p> <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Challenge and Objective G- An imbalance in the Housing Offer Across the Borough and a Shortage of Gypsy and Traveller Sites • Policy P6 – Provision of Sites for Gypsies and Travellers • Paragraphs 8.7.1 to 8.8

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> • Figure 18 – Delivery and Monitoring Framework <p>Statement of Consultation (July 2013) (DPD 027)</p> <p>Gypsy and Traveller Site Allocations DPD Options Paper (July 2011) (DPD 013)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options (July 2012) (DPD 009)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Draft (April 2013) (DPD 004)</p> <p>Solihull Local Development Scheme (September 2012) (026)</p>
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i></p> <p>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p> <p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. 	<p>Evidence of need as demonstrated in the Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020)</p> <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Criteria in Policy P6 – Provision of Sites for Gypsies and Travellers and paragraphs 8.7.1 to 8.8 <p>Gypsy and Traveller Site Allocations DPD Options Paper (July 2011) (DPD 013)</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Gypsy and Traveller Site Allocations DPD Options Paper – Summary of Representations Received (October 2011) (DPD 015)</p> <p>Gypsy and Traveller Site Allocations DPD Options Paper – Council’s Response to Representations (October 2011) (DPD 016)</p> <p>List of Submitted Sites (October 2011) (DPD 017)</p> <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options (July 2012) (DPD 009)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options - Summary of Representations Received (November 2012) (DPD 011)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options – Council’s Response to Representations and Recommendations (November 2012) (DPD 012)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Draft (April 2013) (DPD 004)</p> <p>Gypsy and Traveller Site Allocations</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>DPD Submission Draft – Summary of Representations Received (June 2013) (DPD 007)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Draft – Council’s Response to Representations and Recommendations (June 2013) (DPD 008)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 9 Delivery and monitoring and paragraph 9.1.2 <p>Statement of Consultation (July 2013) (DPD 027)</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal). 	<p>Main Modifications are proposed to the Solihull Draft Local Plan. A new policy on Sustainable Development is proposed as a Main Modification.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use development, and take account of cross-</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001)</p> <p>Evidence of need as demonstrated in the Solihull Gypsy and Traveller</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
boundary and strategic issues. Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).	the Duty to Co-operate.	Accommodation Assessment (February 2012) (DPD 020) Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018) Statement of Consultation (July 2013) (DPD 027)
NPPF Principles: Delivering sustainable development		
1. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy and LEP Strategy where appropriate. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	Not applicable to the Gypsy and Traveller Site Allocations DPD
2. Ensuring the vitality of town centres (paras 23-37)		
Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of 	Not applicable to the Gypsy and Traveller Site Allocations DPD

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
centres over the plan period (23)	appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.	
Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)	<ul style="list-style-type: none"> • An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. • Primary and secondary shopping frontages identified and allocated. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> • Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
4. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion</p>	<ul style="list-style-type: none"> • Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. • Policies encouraging development which facilitates the use of sustainable modes of transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35. • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers includes criteria on the need for local services and facilities such as schools, health facilities, fresh food and employment to be accessible by walking, cycling and public transport or for the site to be sustainable in other ways.

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>(29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be</p>	<p>justified and necessary? (39)</p> <ul style="list-style-type: none"> • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Appendix 1 – Site Assessment Criteria and Detailed Considerations include further issues that need to be considered in the site assessment process. Page 31 of the DPD Submission Document includes further transport sustainability / accessibility considerations. <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018):</p> <ul style="list-style-type: none"> • All site assessments include transport sustainability / accessibility considerations

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>
<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>Evidence of need as demonstrated in the Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013)</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
applies where there has been persistent under delivery of housing(47)		(DPD 001) identifies sites and pitches to meet assessed evidence of need. Specifically: <ul style="list-style-type: none"> • Chapter 4 – Gypsy and Traveller Accommodation Need in Solihull • Chapter 7 – Site Allocations
Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001) identifies sites and pitches to meet assessed evidence of need. Specifically: <ul style="list-style-type: none"> • Chapter 4 – Gypsy and Traveller Accommodation Need in Solihull • Chapter 7 – Site Allocations
Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	Not applicable to the Gypsy and Traveller Site Allocations DPD
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) 	Not applicable to the Gypsy and Traveller Site Allocations DPD

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) Examples of special circumstances to allow new isolated homes listed at para 55. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
7. Requiring good design (paras 56-68)		
Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).	<ul style="list-style-type: none"> Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> Policy GTS 6 Detailed Planning Considerations requires proposals for development to have regard to the Government's good practice guide on 'Designing Gypsy and Traveller Sites' where appropriate. Criteria incorporating design and layout issues are also included in the policy.
8. Promoting healthy communities (paras 69-77)		

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69) 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 1 Temporary Stopping Places and Policy GTS 6 Detailed Planning Considerations require proposals for development to promote community safety and social cohesion.
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure. 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 6 Detailed Planning Considerations requires proposals for development to ensure children can play safely on site.
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with 	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78)	
9. Protecting Green Belt land (paras 79-92)		
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers states that sites in the Green Belt will not be permitted unless other locations have been considered and only then in 'very special circumstances'.
10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building's sustainability which are 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<p>consistent with the Government’s zero carbon buildings policy . (95))</p>	<p>Gypsies and Travellers includes criteria on the need for sites to be located outside areas prone to flooding.</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 6 Detailed Planning Considerations requires proposals for development to reduce exposure to severe weather and climatic risks where feasible, utilising for example, natural shade and shelter. Consideration should also be given to the use of renewable energy systems such as wind or solar energy.
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 6 Detailed Planning Considerations requires proposals for development to reduce exposure to severe weather and climatic risks where feasible, utilising for example, natural shade and shelter. Consideration should also be given to the use of renewable energy systems such as

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
Minimise vulnerability to climate change and manage the risk of flooding (99)	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) • Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) • Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>wind or solar energy.</p> <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers includes criteria on the need for sites to be located outside areas prone to flooding. <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 6 Detailed Planning Considerations requires proposals for development to reduce exposure to severe weather and climatic risks where feasible, utilising for example, natural shade and shelter. Consideration should also be given to the use of renewable energy systems such as wind or solar energy.
Manage risk from coastal change (106)	<ul style="list-style-type: none"> • Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. • Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
11. Conserving and enhancing the natural environment (paras 109-125)		
Protect valued landscapes (109)	<ul style="list-style-type: none"> • A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. • Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers includes criteria on the need to ensure that sites do not have any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity, or the historic environment that cannot be mitigated. <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Appendix 1 – Site Assessment Criteria and Detailed Considerations include further issues that need to be considered in the site assessment process. Page 30 of the DPD Submission Document includes further landscape /conservation / ecology / biodiversity / historic environment considerations. <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018):</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<ul style="list-style-type: none"> All site assessments include landscape /conservation / ecology / biodiversity / historic environment considerations.
Prevent unacceptable risks from pollution and land instability (109)	<ul style="list-style-type: none"> Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	Not applicable to the Gypsy and Traveller Site Allocations DPD
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117)</p>	<ul style="list-style-type: none"> Identification and mapping of local ecological networks and geological conservation interests. Policies to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> Policy P6 – Provision of Sites for Gypsies and Travellers includes criteria on the need to ensure that sites do not have any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity, or the historic environment that cannot be mitigated. <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> Appendix 1 – Site Assessment Criteria and Detailed Considerations include further issues that need to be considered in the site assessment process. Page 30 of the DPD Submission Document includes further

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		landscape /conservation / ecology / biodiversity / historic environment considerations. Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018): <ul style="list-style-type: none"> All site assessments include landscape /conservation / ecology / biodiversity / historic environment considerations.
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. A map/register of historic assets A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	Solihull Draft Local Plan Submission Document (September 2012) (DPD 022): <ul style="list-style-type: none"> Policy P6 – Provision of Sites for Gypsies and Travellers includes criteria on the need to ensure that sites do not have any unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity, or the historic environment that cannot be mitigated. Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001): <ul style="list-style-type: none"> Appendix 1 – Site Assessment Criteria and Detailed

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Considerations include further issues that need to be considered in the site assessment process. Page 30 of the DPD Submission Document includes further landscape /conservation / ecology / biodiversity / historic environment considerations.</p> <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018):</p> <ul style="list-style-type: none"> All site assessments include landscape /conservation / ecology / biodiversity / historic environment considerations.
<p>13. Facilitating the sustainable use of minerals (paras 142-149)</p>		
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>Account taken of the matters raised in relation to paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p>		

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with who and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>Statement of Consultation (July 2013) (DPD 027)</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who they were produced by. <p>AND</p> <ul style="list-style-type: none"> • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). 	<p>Evidence of need as demonstrated in the Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020)</p> <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Criteria in Policy P6 – Provision of Sites for Gypsies and Travellers <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018)</p> <p>Sustainability Appraisal (SA) of the Solihull Gypsy and Traveller Site Allocations DPD – Final SA Report (March 2013) (DPD 005)</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of 	<p>Gypsy and Traveller Site Allocations DPD Options Paper (July 2011) (DPD 013)</p> <p>DPD Options Paper SA (May 2012)</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<p>development, strategic policies and development management policies.</p> <ul style="list-style-type: none"> • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>(DPD 014)</p> <p>DPD Options Paper – Summary of Representations Received (October 2011) (DPD 015)</p> <p>DPD Options Paper – Council’s Response to Representations (October 2011) (DPD 016)</p> <p>List of Submitted Sites (October 2011) (DPD 017)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options (July 2012) (DPD 009)</p> <p>DPD Preferred Options SA (July 2012) (DPD 010)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options - Summary of Representations Received (November 2012) (DPD 011)</p> <p>Gypsy and Traveller Site Allocations DPD Preferred Options – Council’s Response to Representations and Recommendations (November 2012) (DPD 012)</p> <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Draft (April 2013) (DPD 004)</p>

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>DPD Submission Draft SA (March 2013) (DPD 005):</p> <ul style="list-style-type: none"> • Section 5 – The Story of Plan Making / SA to Date <p>Gypsy and Traveller Site Allocations DPD Submission Draft – Summary of Representations Received (June 2013) (DPD 007)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Draft – Council’s Response to Representations and Recommendations (June 2013) (DPD 008)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 2 – How the Development Plan Document has been developed
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be ‘effective’ a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities 		

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan’s vision and objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD? • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans). • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 9 – Delivery and Monitoring <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Challenge and Objective G- An imbalance in the Housing Offer Across the Borough and a Shortage of Gypsy and Traveller Sites • Policy P6 – Provision of Sites for Gypsies and Travellers • Paragraphs 8.7.1 to 8.8 • Figure 18 – Delivery and Monitoring Framework
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their delivery, or a plan for resolving issues. 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers • Figure 18 – Delivery and Monitoring Framework

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
infrastructure and does the timing of the provision complement the timescale of the policies?	<ul style="list-style-type: none"> • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	Solihull Local Development Framework Infrastructure Delivery Plan Submission Draft (September 2012)
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for development and the use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area • 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 1– Introduction and Context
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances? • Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to be reviewed. • Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ol style="list-style-type: none"> a. the effectiveness of policies and what evidence is being collected to undertake this b. changes affecting the baseline information and any information on trends on which the DPD is based • Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances • Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 9 – Delivery and Monitoring (paragraph 9.1.2)

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies? 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate. 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> Chapter 2 – How the Development Plan has been developed (Section 2.7)
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> Sections of the DPD setting out indicators, targets and milestones Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories Reference to any other reports or technical documents which contain information on the delivery of policies Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> Chapter 9 – Delivery and Monitoring <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> Policy P6 – Provision of Sites for Gypsies and Travellers Figure 18 – Delivery and Monitoring Framework

Soundness Self-Assessment Checklist (January 2013)

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		Solihull Local Development Framework Infrastructure Delivery Plan Submission Draft (September 2012)
<p><i>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? • Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, where appropriate, other information which provides the rationale for departing from national policy. • Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. • Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Chapter 3 – Planning Policy Context

Soundness Self-Assessment Checklist (January 2013)

Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
<p>Policy A: Using evidence to plan positively and manage development (para 6)</p>		
<p>Early and effective community engagement with both settled and traveller communities.</p>	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	<p>Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020) included interviews with the local Gypsy and Traveller community</p> <p>Statement of Consultation (July 2013) (DPD 027):</p> <ul style="list-style-type: none"> • Specific targeting of the local Gypsy and Traveller community and their representative groups throughout the DPD process (paragraphs 3.4, 4.3, 5.2 and 6.1)
<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020) included interviews with the local Gypsy and Traveller community and identifies the need for pitches between 2012 and 2027</p> <p>Statement of Consultation (July 2013) (DPD 027):</p> <ul style="list-style-type: none"> • Specific targeting of the

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>local Gypsy and Traveller community and their representative groups throughout the DPD process (paragraphs 3.4, 4.3, 5.2 and 6.1)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Section 2.7 Duty to Co-operate
<p>Policy B: Planning for traveller sites (paras 7-11)</p>		
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>Solihull Gypsy and Traveller Accommodation Assessment (February 2012) (DPD 020) identifies pitch requirements between 2012 and 2027</p> <p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers sets pitch targets and establishes criteria to guide land supply allocations <p>Gypsy and Traveller Sites</p>

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>Assessments (May 2013 update) (DPD 018)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Appendix 1 – Site Assessment Criteria and Detailed Considerations include further issues that need to be considered in the site assessment process. The site assessment criteria ensure that social, economic and environmental sustainability considerations are covered • Chapter 4 – Gypsy and Traveller Accommodation Need in Solihull • Chapter 7 – Site Allocations
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
		<p>establishes criteria to guide land supply allocations. Criteria i. seeks to ensure that the size and scale of the site and the number of caravans stationed is appropriate to the size and density of the local settled community.</p> <p>Gypsy and Traveller Sites Assessments (May 2013 update) (DPD 018)</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Appendix 1 – Site Assessment Criteria and Detailed Considerations include further issues that need to be considered in the site assessment process.
<p>Policy D: Rural exception sites (para 13)</p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.</p>	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall be used for affordable traveller sites in perpetuity. 	<p>No rural exception site policy is proposed in the DPD.</p> <p>Gypsy and Traveller Site Allocations DPD Submission Document (July 2013) (DPD</p>

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
		001): <ul style="list-style-type: none"> • Policy GTS 7 – Safeguarding seeks to ensure that existing and future Gypsy and Traveller sites remain as such and are not lost to alternative development.
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> • Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	<p>Solihull Draft Local Plan Submission Document (September 2012) (DPD 022):</p> <ul style="list-style-type: none"> • Policy P6 – Provision of Sites for Gypsies and Travellers conforms with national policy and states that sites in the Green Belt will not be permitted unless other locations have been considered and only then in very special circumstances. <p>No Green Belt boundary revisions proposed in the DPD.</p>
Policy F: Mixed planning use traveller sites (paras 16-18)		
<p>Local planning authorities should consider,</p>	<ul style="list-style-type: none"> • Consideration of the need for sites for mixed residential and 	<p>Gypsy and Traveller Site Allocations DPD Submission</p>

Soundness Self-Assessment Checklist (January 2013)

Policy Expectations	Possible Evidence	Evidence Provided
<p>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.</p>	<p>business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another.</p> <ul style="list-style-type: none"> • N.B. Mixed use should not be permitted on rural exception sites 	<p>Document (July 2013) (DPD 001):</p> <ul style="list-style-type: none"> • Policy GTS 6 – Detailed Planning Considerations states that schemes should make clear what commercial activity, if any, would be carried out on site.
<p>Policy G: Major development projects (para 19)</p>		
<p>Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.</p>	<ul style="list-style-type: none"> • Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	<p>Not applicable to the Gypsy and Traveller Site Allocations DPD</p>

End

Appendix 3



**Development Services
Tracy Darke – Head of Service**

PO Box 2178, Warwick District Council, Riverside House
Milverton Hill, Royal Leamington Spa, CV32 5QH

direct line: 01926 456065

switchboard: 01926 410410

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Dave Simpson
Planning Policy Manager
Solihull Borough Council
Library Square
Solihull
West Midlands
B91 9RG

our ref: TD/DB/JB
your ref:

18 January 2013

Dear Dave

Duty to Cooperate – Gypsies and Travellers

As you know we are currently preparing our submission draft Local Plan. One of these issues we are finding particularly hard to resolve is providing sites for Gypsies and Travellers. Our recent Gypsies and Travellers Accommodation Assessment has identified a requirement for 31 permanent pitches over the Plan period (2011 to 2029), including 25 in the first 5 years.

At present we do not have any authorised pitches within the District. We are working hard to address this and hope to allocate sites within the Local Plan. However, given the environmental constraints within the District (for instance the extent of the green belt which covers around 80% of our area), I have some concerns that we may not be able to provide for fully for the 5 year requirement within the District.

I appreciate this is a difficult issue for all local authorities and recognise that provision in your area may not be straight forward either. So, I am therefore seeking to engage with you to discuss the following:

- Is there any spare capacity within the existing sites in your area which could contribute to the requirements for Warwick District?
- Are there any suitable sites close to our border which could help to contribute to the requirements of both authorities?



- Given the varied nature of accommodation requirements of Gypsy and Travellers communities, is there scope for us to "share" our provision to offer a wider choice of sites?
- Are there any other approaches we could take to jointly addressing the needs of Gypsies and Travellers to the mutual benefit of our communities?

I would be grateful if you could give these matters some thought and hope we can arrange to meet up shortly to discuss these matters.

Yours sincerely



pp Tracy Darke
Head of Development Services

Appendix 4

Ms Tracy Darke
Development Services
PO Box 2178
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5QH

PLACES DIRECTORATE

Council House, Manor Square
Solihull, West Midlands B91 3QB
Tel: 0121-704 6428 Fax: 0121-704 6575
Email: etinsley@solihull.gov.uk
www.solihull.gov.uk

Please ask for Emma Tinsley

7th February 2013

Your ref: TD/DB/JB

Our ref: ET/WDC

Dear Ms Darke

Duty to Cooperate – Gypsies and Travellers

I write with reference to your letter dated 18 January 2013 regarding the above.

We are aware that Warwick District Council is currently in the process of preparing a new Local Plan and that a 'call for sites' is being undertaken for potential Gypsy and Traveller sites within the District to be identified, and ultimately allocated within the Local Plan.

Although I appreciate the difficulties Warwick District may face in identifying sites for Gypsies and Travellers, Solihull is in a similar position with regard to the number of pitches required and the environmental constraints of the Borough.

In March 2012, Solihull published its updated Gypsy and Traveller Accommodation Assessment (GTAA). In order to address potential cross boundary issues, the Council explored joint working with neighbouring authorities, including Warwick District Council, to update the GTAA. At the time, Warwick was not in a position to undertake this work and the differing timescales and priorities of each authority resulted in Solihull undertaking an independent update of its Gypsy and Traveller evidence base.

As outlined in our 2012 Gypsy and Traveller Accommodation Assessment, Solihull has an identified need of 38 pitches over the plan period (2012 – 2027) including 26 in the first five years, and 67% of the Borough is also green belt. However, Solihull is planning to meet this need within its own boundary through the preparation of a Gypsy and Traveller Site Allocations Development Plan Document (DPD). Policy P6 of the Solihull Draft Local Plan (currently the subject of Independent Examination) provides the framework for the DPD, sets pitch targets for the Borough and establishes criteria to guide land supply allocations and determine planning applications, in accordance with 'Planning Policy for Traveller Sites'.

As part of the DPD and Local Plan process, we have also reviewed all tolerated Gypsy and Traveller sites without planning permission and have subsequently granted planning permission for some pitches. The Council itself has also brought forward some pitches and is working with a Registered Social Landlord to meet the need for social rented pitches.

The preparation of our Gypsy and Traveller Site Allocations DPD is now well underway and consultation on both 'Options' and 'Preferred Options', which included the identification of preferred sites, has taken place. A draft Submission DPD will be considered by our Cabinet in March 2013 and published shortly thereafter. Full submission to the Secretary of State is programmed for July 2013 with adoption before the end of the year.

It has been a lengthy and challenging process to identify sites for our own need and we are unable to identify any sites which could contribute meet the requirements of both authorities. In addition, Solihull does not have any spare capacity on our existing sites to accommodate need arising in Warwick District.

Unfortunately, Solihull is therefore unable to help address the difficulties Warwick District has in meeting the accommodation needs of its Gypsy and Traveller population. However, Solihull will continue to consult and engage with Warwick, and we are happy to share information and explore how we work with the Gypsy and Traveller Community to better understand their needs.

Yours sincerely



Emma Tinsley
Principal Planning Officer
Policy and Spatial Planning



Appendix 5

Solihull Gypsy and Traveller Site Allocations Development Plan Document (DPD)

Schedule of changes between Submission Draft (April 2013) and formal Submission (July 2013)

Ref.	Chapter or Section	Policy or Paragraph	Proposed Change	Reason for Proposed Change
1	6 - Strategy	Policy GTS 1 – Temporary Stopping Places	Insert new bullet point: 'The design includes measures to promote community safety and social cohesion through measures such as natural surveillance on site;'	To recognise that social sustainability and community cohesion are locally specific issues in Solihull that justify a specific policy reference in the DPD.
2	8 – Detailed Planning Considerations and Safeguarding	Policy GTS 6 – Detailed Planning Considerations	In the first sentence Insert: 'where appropriate' after "Designing Gypsy and Traveller Sites"	To recognise that the Government's Good Practice Guide on 'Designing Gypsy and Traveller Sites' is primarily intended to cover social site provision, but that the document includes good practice which is equally applicable to both socially and privately provided sites. The guidance states that it may not be appropriate to use the good practice guide in isolation to decide whether a private application for site development should be given planning permission and this amendment to Policy GTS 6 ensures consistency with Government guidance.
3	8 – Detailed Planning Considerations and Safeguarding	Policy GTS 6 – Detailed Planning Considerations	Insert new bullet point: 'Promote community safety and social cohesion through measures such as natural surveillance on site;'	To recognise that social sustainability and community cohesion are locally specific issues in Solihull that justify a specific policy reference in the DPD.
4	8 – Detailed Planning Considerations and	Paragraph 8.2.1	Delete final sentence of paragraph 8.2.1 and insert new text:	To provide justification for use of the term 'where appropriate' in Policy GTS 6 when

Ref.	Chapter or Section	Policy or Paragraph	Proposed Change	Reason for Proposed Change
	Safeguarding		<p>'The Government's Good Practice Guide on Designing Gypsy and Traveller Sites identifies good practice that can be equally applicable to both socially and privately provided sites. However, as recognised in the guidance, it may not be appropriate to use the good practice guide in isolation to decide whether a private application for site development should be given planning permission. Other criteria are therefore identified in the policy to ensure that good quality sites are provided, rather than just meeting a numerical requirement for pitches'</p>	referring to the Government's Good Practice Guide.
5	9 – Delivery and Monitoring	Paragraph 9.1.2	<p>Delete paragraph 9.1.2 and replace with: 'In the event that any allocated site should fail to deliver the number of pitches, the Council's approach to phasing site allocations will provide a mechanism for pitches to be bought forward early. Policy P6 of the draft Local Plan also makes provision for any unmet need to be met through the planning application process. Therefore, alternative approaches can be pursued if this situation</p>	To further emphasise the flexibility of the DPD and make specific reference to the Council's commitment to keeping the Gypsy and Traveller Accommodation Assessment (GTAA) up to date, and the possible implications this may have on the need to review the site allocations DPD.

Ref.	Chapter or Section	Policy or Paragraph	Proposed Change	Reason for Proposed Change
			<p>arises. In addition, the Council will update the GTAA in due course (circa 5 years) to ensure the Borough's evidence of need for Gypsy and Traveller accommodation remains up to date. This may then trigger a review of the DPD.'</p>	

In addition, a number of other minor changes were made to the document to correct typographical errors, address points of clarification, update the position with regard to planning applications and permissions, and ensure that the document was written in the style of a formal submission document, rather than a consultation document.

Appendix 6



**Solihull Draft Local Plan
Shaping a Sustainable Future**

EXAMINATION

Summary of Representations to the Main Modifications and Council's Responses

September 2013

Introduction

This document summarises the representations received on Main Modifications to the Solihull Draft Local Plan as published for consultation between 15 July and 27 August 2013. This document also includes the Council’s response to these representations and sets out:

- Representor’s details and position (colour coded blue in the following tables):

i)	List of representors*
ii)	Whether respondents support or object to the modification
iii)	Whether the respondents consider the modification to be legally compliant , sound or unsound and which test of soundness is applicable**
iv)	Summaries of the representations received, by Main Modification number
v)	Whether any alternative wording to the modification has been suggested
vi)	Whether the respondents wish their representation to be considered by written representations or whether they wish to participate in person at an examination hearing

- Council’s position (colour coded green in the following tables):

vii)	Whether a representation relates to a Main Modification or not
viii)	Whether the issue(s) raised has already been dealt with as part of the examination process
ix)	The Council’s response to the representations

*Where representors have previously responded to the Pre-Submission Draft version of the Solihull Draft Local Plan, they have been assigned the same personal ID number as before. Where new representors have responded, they have been assigned personal ID numbers starting at 700. Representors making late representations to the main modifications consultation (i.e. after 5pm on 27 August 2013) have been given the suffix ‘PD’ (post deadline).

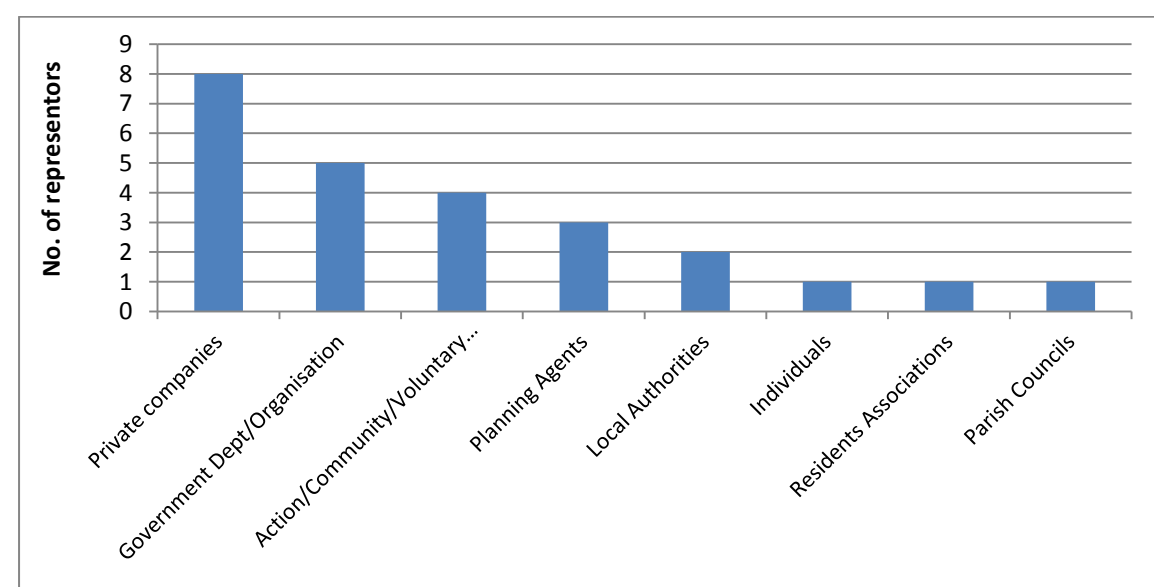
**The following abbreviations for the tests of soundness have been used:

P = Not **positively prepared** E = Not **effective**
 J = Not **justified** C = Not **consistent with national policy**

Response Details

23 respondents submitted representations by the deadline, with 2 being received after the deadline. Responses were received as emails, letters and using the Council’s response form.

Figure 1 – Number of respondents by category



Every effort has been made to ensure that all responses received have been summarised correctly and incorporated into this document. If you are aware of any errors or omissions, please contact the Spatial Planning Team on 0121 704 6395 or PSP@solihull.gov.uk.

Category Definitions

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

Personal Information of Representees

Person ID	Category	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation
002	10	Diane Clarke	Network Rail		
009	3		HARP		Tetlow King
PD16	3	Richard Wheat	Warwickshire Wildlife Trust		
PD32	4	Amanda Grundy	Natural England		
062	4	Rachael Bust	The Coal Authority		
206	4	Matthew Taylor	Highways Agency		
207	6	Waheed Nazir	Birmingham City Council		
228	3	Wendy Wilson	BARRAGE		
231	4	Helen Davies	Centro		
232	10	Jon Hockley	Birmingham Airport		
261	10		Lend Lease Retail Partnership	Susie Rolls	GVA
262	7	Dunleavy Family		Philip Woodhams	Portland Planning Consultants Ltd.
329	10		Taylor Wimpey UK Ltd	Philip Brown	Savills
331 & 383	10		Bloor Homes & Gallagher Estates	Chris May	Pegasus Group
349	13	Fergus Thomas	Catesby Estates Ltd	John Acres	Turley Associates
510	3	Chris Crean	Friends of the Earth		
525	10		William Davis	Mark Rose	Define
528	4	Mrs Becky Clarke	Environment Agency		
549	10		Lioncourt Homes		GVA
700	13		Trustees of the Shonleigh Settlement	Alasdair Jones	Marrons
701	13			Alison Heine	Heine Planning Consultancy
702	6	Stephen Hughes	West Midlands Joint Committee		
703	10		AEW	Louise Brooke-Smith	Brooke Smith Planning
259(PD)	2	Chris Noble	Cheswick Green Parish Council		
368(PD)	1	Andrew Marston	Knowle Society		

Representations to Main Modification: MM26

Person ID	Main Mod No.	Support/ Object?	Legally compliant?	Sound or unsound?	Test of Soundness?	Representation	Suggested wording	Hearing / Written Rep?	Does rep. relate to a main mod?	Has the issue already been considered? If so, where?	Council's response to representation
232	MM26	Support	No comment	No comment	No comment	Support inclusion of point (v) re: the need for residential amenity for both site residents and neighbouring land uses in the allocation of sites and the determination of applications.	None suggested	Written rep	Yes	N/A support.	N/A support.
701	MM26	Object	No	Unsound	P, J, E, C	<p>Needs to be made clear which is the correct forum to discuss the issues with the 2012 GTAA. Concern that any changes made and agreed to draft Policy P6 would render it difficult to discuss this matter as part of Site Allocation DPD process.</p> <p>Question the robustness of the GTAA - underestimates overcrowding on existing sites; no allowance for in migration; no regard to persistent under delivery; no regard to need for choice and competition in the market.</p> <p>GTAA does not state that there is no requirement for a travelling showpeople site in the Borough, but states that further work i.e. a cross-boundary assessment would identify if there is a shortage of travelling showpeople sites in the Borough. Has this assessment been carried out?</p> <p>GTAA is a quantitative assessment and fails to consider the quality of existing sites. If the Haven were laid out in accordance with CLG guidance, it would have far less families.</p> <p>Para. 11.26 of GTAA relies on 2% rather than standard 3% household formation rate. No evidence why Solihull is different to standard.</p> <p>GTAA states that most of the need for residential pitches 2012-2017 is immediate, and this should be reflected in policy.</p>	<p>Suggested Change: The Solihull GTAA was updated in 2012 and identified a need for at least 38 permanent residential pitches... Of these, there is an immediate and pressing need for at least 26 pitches 2012-2017...</p> <p>DELETE 'The GTAA identified no requirement...'</p> <p>REPLACE WITH: The GTAA recommended that further work be done to assess the needs of Travelling Showpeople. Rather than provide a formal transit site, the need for which is hard to predict, provision of transit provision within and as part of private sites will be encouraged to provide land for Gypsy-Travellers coming into and passing through the Borough.</p> <p>ADD: In the event that further strategic studies of Gypsy-</p>	Not specified	Yes	No.	<p>Policy P6 sets out pitch requirements and provides the overall context and policy framework for meeting the needs of Gypsies and Travellers.</p> <p>The Council is confident in the robustness of the 2012 GTAA (SLP025). The GTAA was undertaken by a highly experienced research team and the survey received a significantly larger response rate than many other GTAAs carried out, including the previous GTAA which covered Solihull. The GTAA has followed CLG guidance in relation to carrying out GTAAs.</p> <p>It is not necessary to add 'at least' 38 permanent residential pitches to the wording of Policy P6. It is not a requirement of the PPTS and the Council is confident that the GTAA provides a full assessment of what the Borough's needs are, which are clearly set out in the policy.</p> <p>The Council disputes that the GTAA has underestimated over-crowding on existing sites. The GTAA survey received an 80% response rate which included representation from every authorised site in the Borough. The GTAA recognises that the assessment of need must include those whose existing accommodation is overcrowded or unsuitable. Paragraph 11.9 of the GTAA confirms that site overcrowding was considered but there was no strong evidence that sites are overcrowded to any great extent.</p> <p>It is submitted that the issue of in-migration has not been ignored. The migration patterns of Gypsies and Travellers are difficult to assess and the 2012 GTAA recognises that the survey found no evidence to suggest that there is or is not movement between areas. As such an assumption was made that if movement does occur, in-migration will balance out-migration. Similarly, the previous 2008 GTAA</p>

Person ID	Main Mod No.	Support/ Object?	Legally compliant?	Sound or unsound?	Test of Soundness?	Representation	Suggested wording	Hearing / Written Rep?	Does rep. relate to a main mod?	Has the issue already been considered? If so, where?	Council's response to representation
						<p>No evidence of other locations considered before a second site at Old Damson Lane was granted permission. No evidence of consideration of non Green Belt sites.</p> <p>Existing site at the Haven does not comply with government guidance on site provision. Do not agree that the Haven remains unaffected by the airport expansion plans as it lies under the flight path, contrary to draft Policy P6 (v). Doubt that Council approved site at Old Damson Lane will meet CLG guidance.</p> <p>Consideration should be given to needs of Gypsy-Travellers in Birmingham area and that may require further provision in Solihull to meet this need.</p> <p>Unclear in what context Warwick DC contacted other authorities about their lack of 5 year supply of sites for Gypsy-Travellers.</p> <p>If no formal transit provision is provided or an approach agreed with neighbouring authorities, then draft Policy P6 should recognise the need to include an element of transit provision in private site provision.</p>	<p>Traveller needs in the West Midlands conurbation identifies that further provision is needed in Solihull , a review of the Solihull Local Plan will be brought forward to address this.</p> <p>RETAIN: The provision of pitches to meet this need will be determined through a Gypsy and Traveller Site Allocations DPD.</p>				<p>(SLP 024) acknowledged that there was no source of information on migrational needs for Gypsies and Travellers.</p> <p>Both the 2012 and 2008 GTAA's identified no Travelling Showpeople living in Solihull. No planning applications have ever been made for a Showpeople site in the Borough and there have never been any Showpeople present at any of the 6-monthly counts. It is clear that both current and historic evidence indicates that there is no requirement for a Travelling Showpeople site in Solihull. The GTAA states that further work <i>may</i> need to be produced across local authority boundaries and Solihull would be happy to work with other authorities should their updated evidence bases indicate a requirement for the needs of Travelling Showpeople to be met across a wider area. PPTS emphasises the need to plan using evidence and the Council is confident that this has been done with regard to Travelling Showpeople.</p> <p>Paragraph 11.26 of the GTAA sets out the reasoning behind the application of a 2%, rather than a 3% household formation rate. Rather than applying a generic, commonly assumed rate of household growth, local household formation rates were assessed and used. This is consistent with PPTS and NPPF which emphasises locally assessed needs and taking local circumstances into account.</p> <p>The Council accepts that most of the residential need for pitches between 2012 – 2017 is immediate. This is reflected in the policy justification at paragraph 8.7.4. It is not necessary to add this to the Policy text.</p> <p>The consideration of specific sites is a matter to be dealt with as part of the Gypsy and Traveller Site Allocations DPD examination.</p> <p>There is no evidence or comment from Birmingham City Council to suggest that they will have difficulty in addressing the future accommodation needs of Gypsies and Travellers in their area or will require Solihull's help to help meet their needs.</p> <p>Under the 'duty to cooperate' requirements, Warwick District Council wrote to Solihull and other neighbouring local authorities about their lack of 5 year supply of sites for Gypsy-Travellers. Solihull has</p>

Person ID	Main Mod No.	Support/ Object?	Legally compliant?	Sound or unsound?	Test of Soundness?	Representation	Suggested wording	Hearing / Written Rep?	Does rep. relate to a main mod?	Has the issue already been considered? If so, where?	Council's response to representation
											<p>confirmed that there are no suitable sites within the Borough which could assist Warwick.</p> <p>It is not appropriate for Policy P6 to include an element of transit provision on private sites as evidence from the DPD consultation indicates that the local Gypsy and Traveller community do not want or need transit provision on private sites. However, the Gypsy and Traveller Site Allocations DPD includes a policy on temporary stopping places.</p> <p>No change to the Policy is proposed.</p>
703	MM26	Support	No comment	No comment	No comment	Support modifications and additional text	None suggested	Not specified	Yes	N/A support.	N/A support.

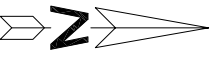
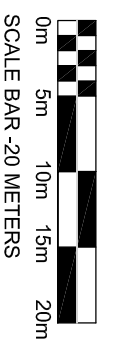
Appendix 7

LEGEND

- new roads min 5.5 metres wide
- existing plot
- site boundary
- New 17metre static Caravan Plot, 3no Car Spaces per Plot, 6 metres between
- existing trees (species unknown)
- existing trees to be removed (dependant on species)



Note: All existing plot boundaries and buildings are indicative only/shown for illustrative purposes and subject to full site survey



the Warren feasibility Scheme

proposed site plan - 1:500 @ A3

Appendix 8

Solihull Metropolitan Borough Council

Gypsy and Traveller Site – Ecology review

Site: 'The Warren', Bickenhill Lane, Marston Green

Site Habitat Description:

The Habitat Biodiversity Audit records the site as unclassified inferring an 'urban' or 'built environment', but could infer that it was not visible and therefore unrecorded. A brief site visit on 14th November 2013 suggests that there has been a high degree of disturbance to the ground leaving it bare, with a number of dead or dying trees. These trees on the site that could offer bat roost potential. The eastern boundary was defined by a vegetated bank that was continuous with the Bickenhill Plantation local wildlife site.

Designated sites:

Onsite		
Status	Name	Description
None		
Within 500 metres of the site		
Status	Name	Description
LWS	Bickenhill Plantation (SP18X1) map ref. 06/18	In terms of both habitat and species rarity the site is of strong local importance. W4 Downy Birch-Purple Moor Grass woodland is very rare in Warwickshire, this site is possibly the only example.
Ecosite	Bickenhill Parish Burial Ground (48/18)	Little ecological data therefore ungraded. Low floral diversity. Includes species such as White Bryony and Lesser Trefoil with a good range of trees.
Ecosite	Coleshill Heath Woodland (59/18)	Woodland – Deciduous Rejected LWS - Oak woodland with frequent birch and hazel with alder and elm understorey. Ground flora includes abundant bramble, frequent Dryopteris dilatata, patches of wood sage, honeysuckle

Geological Interest

There are no Local Geological Sites on or near to the site.

Protected Species

There are protected species records for common and soprano pipistrelle and noctule bats, grass snake, common lizard, slow worm and bats within 500m of the site.

Conclusions

Due to the disturbance of the site from vehicular activity the habitat offers little natural habitat for amphibians and reptiles. However, there is storage and refuse material that could act as refugia and, therefore site clearance may impact on these protected species. The dead and dying trees may be used by bats. To this affect protected species surveys will need to be carried out prior to site clearance and any development. It is suggested that there is the potential to mitigate for this loss within the site boundary with properly constructed refugia or the use of bat boxes.

Recommendation

That this site is taken forward as it is unlikely to have any long term significant ecological or geological impacts.

Note: protected species surveys will be required to inform appropriate mitigation for those species found to be present.

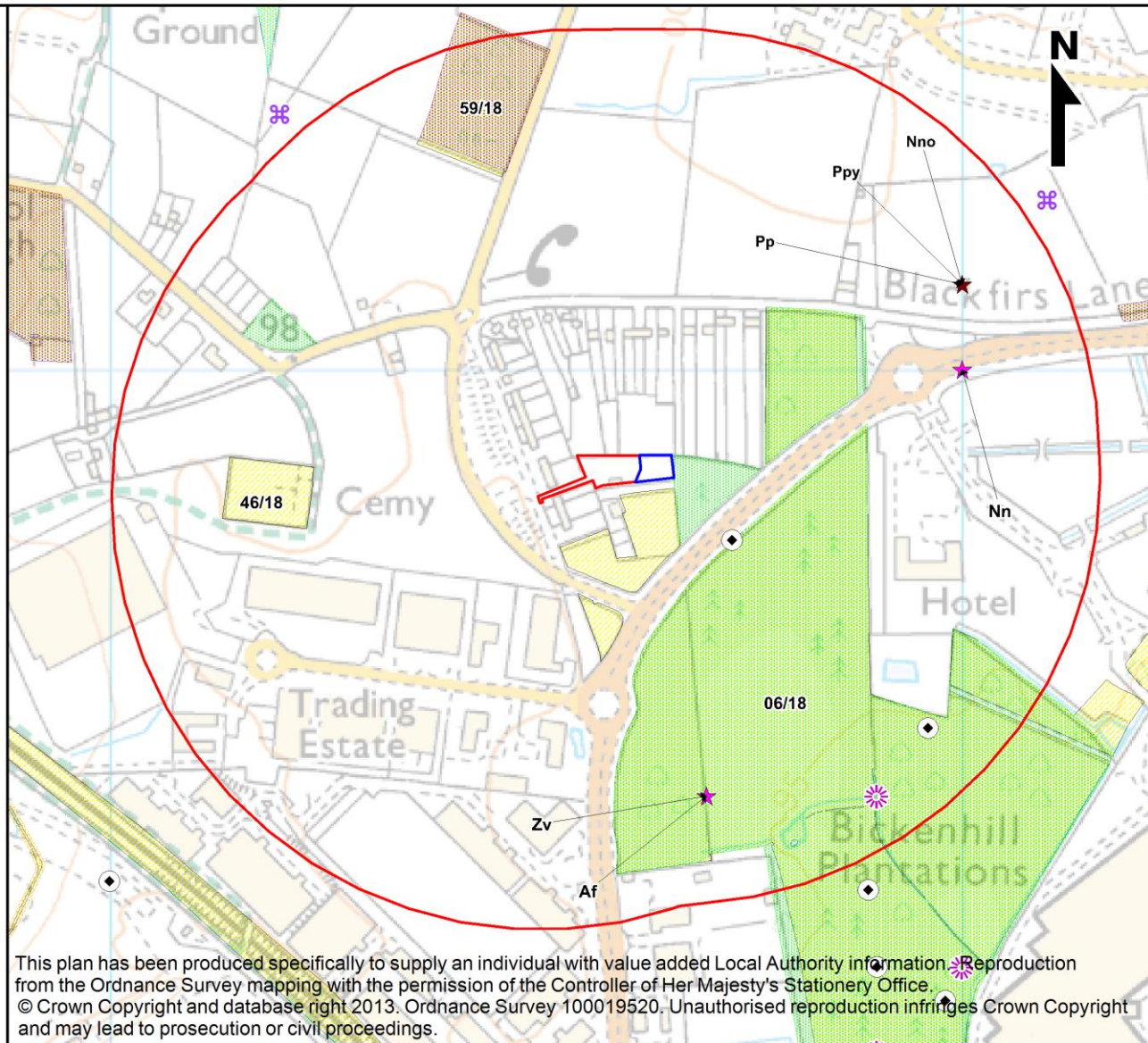
**WARWICKSHIRE
BIOLOGICAL
RECORDS CENTRE**



**Ecological Data Search:
'The Warren'
Bickenhill Lane
Marston Green
SP 185 848
Sites and Species
500m search**

- | | | | |
|---|-------------------------|---|--------------|
| ★ | Bat | ⊗ | SAC |
| ★ | Amphibians and Reptiles | ⊗ | SSSI |
| ★ | Barn Owl | ⊗ | LNR |
| ◆ | White Clawed Crayfish | ⊗ | LWS |
| ▲ | Watervole | ⊗ | pLWS |
| ⦿ | Badger | ⊗ | rejected LWS |
| ■ | Otter | ⊗ | LGS |
| ■ | Dormouse | ⊗ | Ecosites |
| ☀ | Hedgehog | | |
| ▼ | Brown Hare | | |
| ☀ | Rare Plant | | |
| ⊗ | Butterfly | | |
| ★ | Harvest Mouse | | |
| 🌳 | Black Poplar | | |
| 🌳 | Veteran Tree | | |

Warwickshire Biological Records Centre
Warwickshire Historic and Natural
Environment
PO Box 43, Warwick
CV34 4SX
Tel: (01926) 418060



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Appendix 9

Solihull Metropolitan Borough Council

Gypsy and Traveller Site – Ecology review

Site: 'The Haven', Catherine-de-Barnes Lane, Bickenhill

Site Habitat Description:

The Habitat Biodiversity Audit records the site to be 'unclassified' which usually infers in this case as 'urban' or 'built environment'. A brief site visit on 14th November 2013 suggests that the site is used in association with the caravan site to the south and is heavily disturbed.

Designated sites:

Onsite		
Status	Name	Description
None		
Within 500 metres		
Status	Name	Description
LWS	Castle Hill Farm Meadows (SP18R2) map ref. 53/18	Castle Hills Farm Meadows is one of the largest and most important grassland sites in the county. The site comprises 21 fields to the West of Bickenhill and South of Birmingham Airport.
Ecosite	Bickenhill Churchyard (41/18)	Parish Value - Of some local wildlife value, site includes some Bluebells and Red Campion.
SSSI	Bickenhill Meadows	Farmland - Old grass, wet pasture Woodland – Hedge Wetland - Ditch
Ecosite	Clock Lane Meadows (includes Castle Hill Farm Meadows LWS)	Farmland - Semi-improved neutral grassland
Ecosite	Meadows to the east of the Jungle (52/18)	Farmland - Semi-improved neutral grassland Woodland – Deciduous Part LWS and the remaining areas are pLWS. Castle Hill Farm Meadows LWS

Geological Interest

There are no Local Geological Sites in or adjacent to the site.

Protected Species

There are no protected species within the site. There are records for badger, common pipistrelle bats, harvest mouse and Small Heath butterflies (UK BAP, Red listed) within 500m of the site.

Conclusions

The site is unlikely to support protected species, however, the boundary hedges and trees need to be protected and enhanced to maintain their connective functionality in the landscape.

Recommendation

That this site should be taken forward as it is unlikely to have any significant ecological or geological impacts.

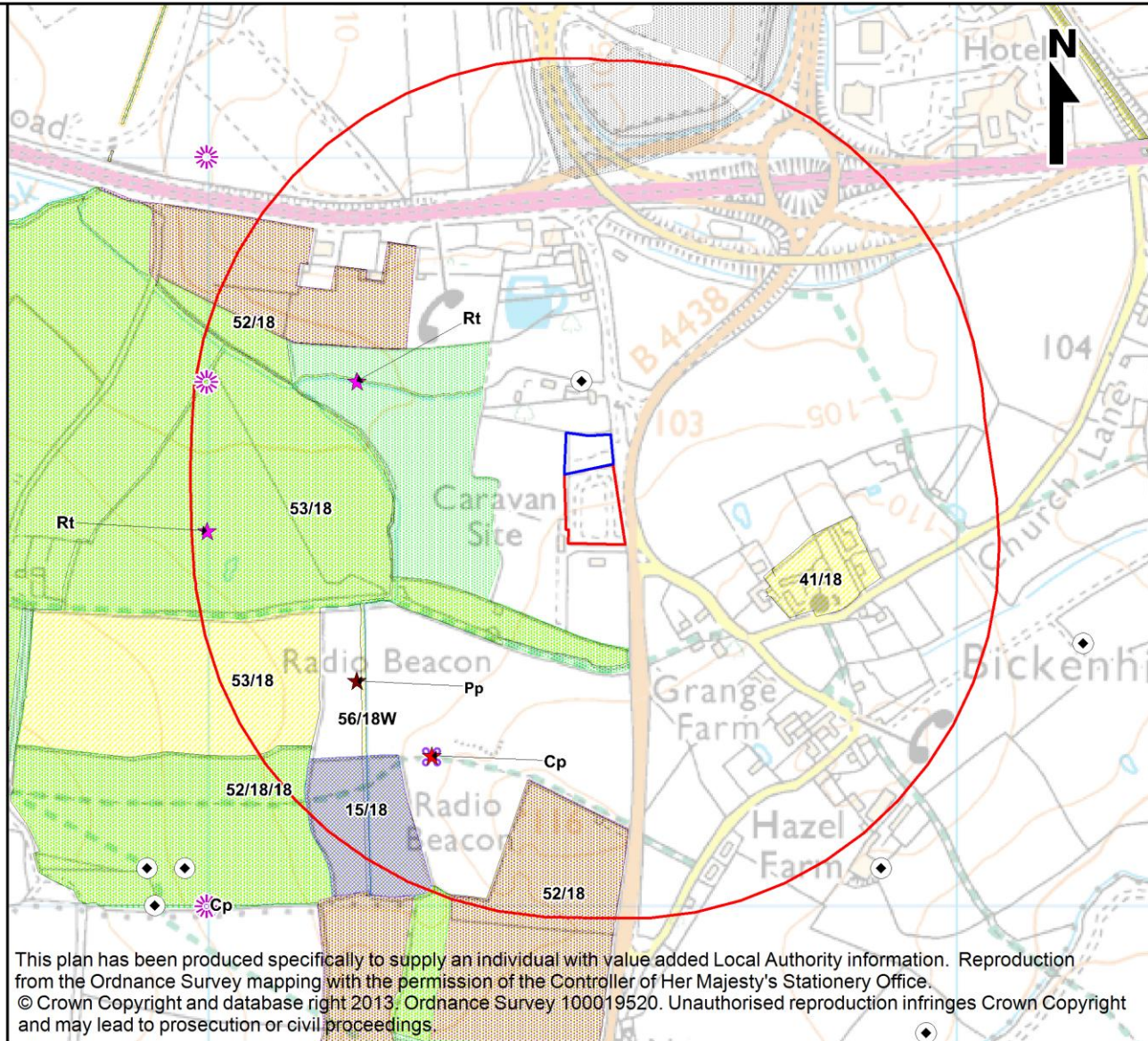
**WARWICKSHIRE
BIOLOGICAL
RECORDS CENTRE**



**Ecological Data Search:
'The Haven'
Catherine-de-Barnes Lane
Bickenhill
SP 185 825
Sites and Species
500m search**

- | | | | |
|---|-------------------------|---|---------------|
| ★ | Bat | ▨ | SAC |
| ★ | Amphibians and Reptiles | ▨ | SSSI |
| ★ | Barn Owl | ▨ | LNR |
| ◆ | White Clawed Crayfish | ▨ | LWS |
| ▲ | Watervole | ▨ | pLWS |
| ◆ | Badger | ▨ | rejected LWS |
| ■ | Otter | ▨ | destroyed LWS |
| ■ | Dormouse | ▨ | LGS |
| ☼ | Hedgehog | ▨ | Ecosites |
| ▼ | Brown Hare | | |
| ☼ | Rare Plant | | |
| ☼ | Butterfly | | |
| ★ | Harvest Mouse | | |
| 🌳 | Black Poplar | | |
| 🌳 | Veteran Tree | | |

Warwickshire Biological Records Centre
Warwickshire Historic and Natural
Environment
PO Box 43, Warwick
CV34 4SX
Tel: (01926) 418060

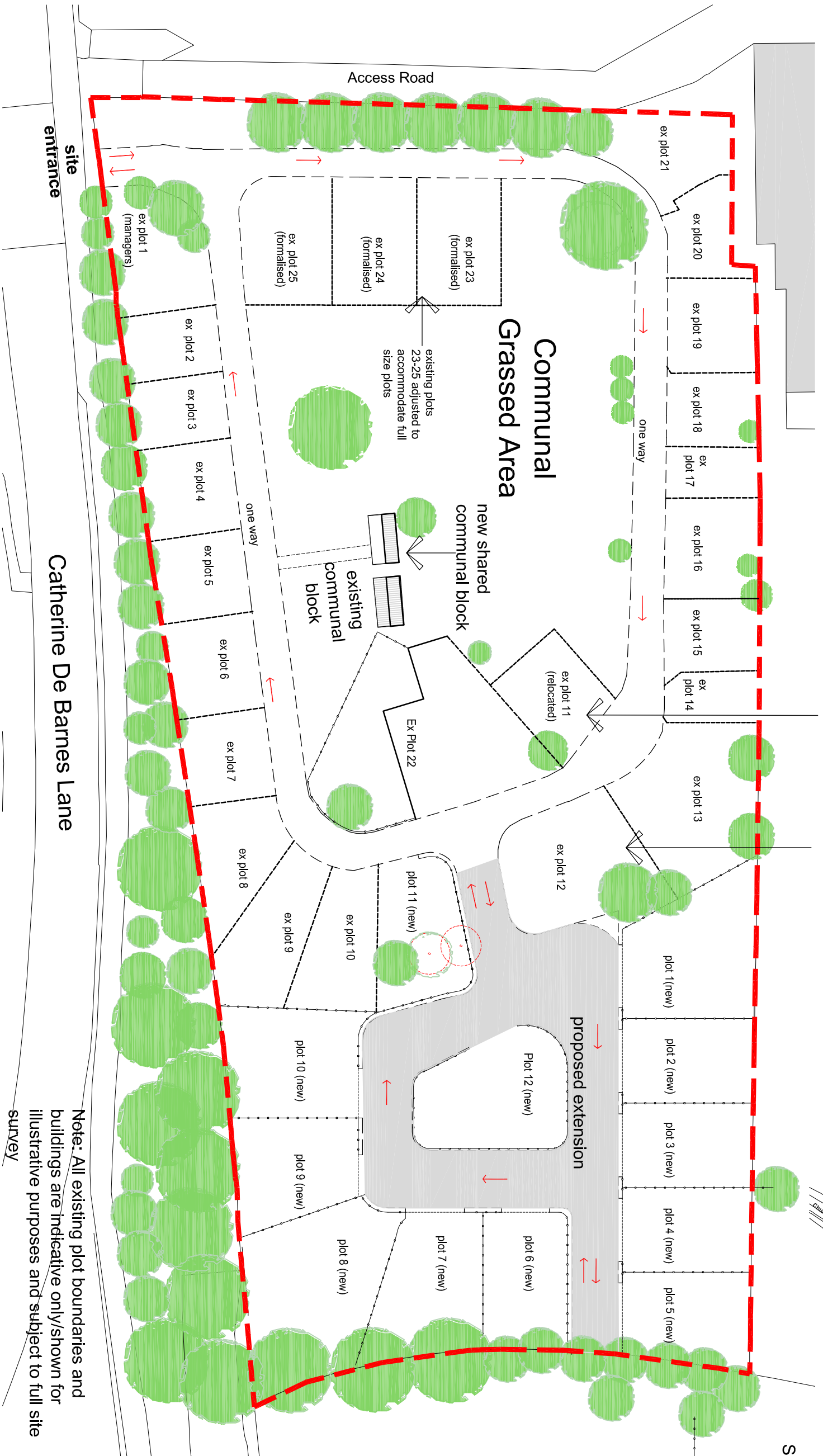


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Appendix 10



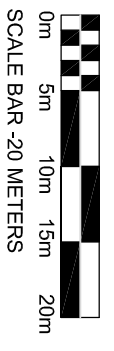
Site Location Scale 1:2500



existing plot 11 relocated to accommodate plot 11 (n) and extend the existing entrance / opening to the proposed extension site

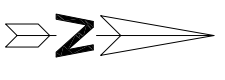
P12 & 13 gardens have been adjusted to accommodate new plots 1-5 and widen the existing entrance/opening to the proposed extension site.

Note: All existing plot boundaries and buildings are indicative only/shown for illustrative purposes and subject to full site survey



the haven feasibility Scheme

proposed site plan - 1:500 @ A3



Appendix 11

SUMMARY CONSIDERATION OF SITES FOR TEMPORARY STOPPING PLACES (2013)

SITE	COMMENTS	SUITABILITY/AVAILABILITY
Birmingham Road Meriden	Not in ownership of the Council. Owners not prepared to make the site available and are talking to another potential occupier. Not considered to be in an accessible location.	Not available.
Fairfield Rise Meriden	Restricted site access and potential conflict of access with existing users. Limited size and overlooked on all sides by existing dwellings and impact on amenities of adjoining dwellings.	Not suitable.
Meer End Road Balsall common	Not a suitable location – distance from Balsall Common and located on fast unlit road. Close proximity to existing dwellings. Potential rights of access and parking issues with existing residents. Green belt location. Conflict with planned drainage works.	Not suitable.
Phase 1 land at Damson Parkway	Leased to Doherty family who are not prepared to share the site.	Not available.
Phase 2 and 3 land at Damson Parkway	Planning permission recently granted in relation to phase 2 yet to be implemented. Occupation prior to completion of infrastructure works considered to result in a major impact on ability to carry out the works and health and safety issues.	Not available in the short term. Cabinet yet to determine marketing and allocation process for when site is available.