



11 June 2014

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Our Ref: 47042498  
Your Ref:

Dear Sarah

**Sustainability Appraisal of the Proposed Modifications to the Gypsy and Traveller Site Allocations Plan (Submission Document)**

Further to your email dated 25<sup>th</sup> April 2014 instructing URS Infrastructure and Environment Ltd (URS) to carry out the Sustainability Appraisal (SA) of the Main Modifications to the Gypsy and Traveller Site Allocations Plan; we have considered the Main Modifications.

In examining the Gypsy and Traveller Site Allocations Plan in December 2013, the Inspector suggested that:

- The proposed site allocations (GTS2 – GTS5), and existing sites where the allocations form extensions to existing sites, are removed from the Green Belt as insets;
- The number of pitches accommodated on the proposed site allocation at The Haven (Policy GTS5) is reduced to 6 pitches and then, only as part of a comprehensive redevelopment scheme of the existing site and;
- The Council explore which, of the omission sites initially considered, would now be most favoured by the Council to accommodate the remaining 6 pitches.

This response sets out the SA implications of the proposed modifications to the Gypsy and Traveller Site Allocations Plan, summarised below:

- Provision of 2 extra pitches at Damson Lane (Policy GTS 2);
- Provision of 1 extra pitch at the Warren (Policy GTS 3);
- Provision of 1 extra pitch at the Uplands (Policy GTS 4);
- Reduction in number of pitches at the Haven from 6 to 12 (Policy GTS 5); and
- Allocation of Canal View (Policy GTS 6),

The letter provides an update on the baseline conditions. An assessment of the alternative approaches considered by the Council to accommodating the remaining 6 pitches is also provided.

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Overall, it has been concluded that the Main Modifications together with the changing baseline would result in a slight improvement on six of the SA objectives (4, 9, 11, 13, 15 and 16) as identified in Box 2-1 of the Sustainability Appraisal Report<sup>1</sup>). The majority of the Main Modifications had no implications or a minor positive or neutral impact on the objectives.

## Alternatives

In addressing the Inspector's requirement to reduce the number of pitches at the Haven from twelve to six to provide a reasonable standard of living accommodation for future occupiers, the Council explored the following options:

- Option 1: Allocating a new site (from the omission sites);
- Option 2: Distributing the remaining pitches across the proposed allocated sites (GTS2 - 4)
- Option 3: Increasing capacity at existing authorised sites to be safeguarded.

At this level of appraisal, there is considerable uncertainty in judging impacts as much depends upon the setting of the sites selected and their layout. Also, the addition of a small number of further pitches to an individual site is often not great enough to give rise to an identifiable significant effect upon the sustainability objectives. Nevertheless, accepting such uncertainties, it is concluded that Options 2 and 3 have the potential to perpetuate existing negative sustainability outcomes due to increasing the number of pitches across the sites. The effects of allocating a new site from the omission sites (Option 1) differ between each of the sites considered. Annex A provides a description of the effects, which are summarised below.

All three Options were considered to have positive effects on Objective 16 housing need.

The Council was unable to identify a viable new candidate site additional to those identified as part of the plan preparation process. Omission sites considered that could accommodate 6 pitches were:

- Land off Salter Street (as this is an extension to an existing family site it wouldn't be available to other families);
- Land at School Road;
- Land at Eaves Green Lane; and
- The Old Civil Service Sports Club.

An assessment of these sites was presented in the Final SA report (see footnote 1 for link). The SA concluded that they performed poorly against the baseline associated with the SA objectives. More specifically, all perform poorly in terms of impact on the Green Belt and visual intrusion into the landscape. Apart from Land off Salter Street, they also perform poorly in terms of accessibility to essential services other than by car and highway safety. There is also evidence of surface water flooding issues on Land off Salter Street and Land at School Road.

Whilst existing sites may perpetuate existing negative sustainability outcomes, some of the sites (including Land off Damson Lane, The Warren, The Uplands and The Haven) perform relatively well against the baseline associated with the SA objectives. More specifically, these sites are well located in terms of the strategic road network, have less impact on landscape character and most perform well in terms of accessibility to essential services (GP surgery and school).

The Council's preferred approach, therefore, incorporated a combination of distributing the remaining pitches across the allocated sites (Option 2) and increasing capacity at existing authorised sites to be safeguarded (Option 3), as sufficient capacity exists at allocated and authorised sites for six new pitches.

## Baseline

The Sustainability Appraisal of the Preferred Options DPD (July 2012) examined twelve potential sites with the findings being re-presented as Appendix C in the March 2013 Final SA Report (see footnote 1 for link). Along with Appendix C, the Final SA Report assessed the four recommended sites (GTS2 - Old

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<sup>1</sup> [http://ww2.solihull.gov.uk/Attachments/DPD\\_005\\_Submission\\_Draft\\_DPD\\_SA.pdf](http://ww2.solihull.gov.uk/Attachments/DPD_005_Submission_Draft_DPD_SA.pdf)

Damson Lane; GTS3 – The Warren; GTS4 – The Uplands; and GTS5 – The Haven) in the context of the proposed policy framework.

Since the Sustainability Appraisal in March 2013, the following changes to the baseline circumstances have occurred:

- **Old Damson Lane:** Planning permission was granted in February 2013 for 7 pitches on Area 2 and this permission has been implemented. Planning permission was also granted in November 2013 for 11 pitches on Area 3. The proposed site at Old Damson Lane relates only to Area 3 and as such, only one Old Damson Lane site is now included in the table in Annex B.
- **The Warren:** Planning permission granted for 6 pitches in May 2014 (one more than the proposed allocation).
- **The Uplands:** Planning permission granted in November 2013 for 4 pitches (one more than the proposed allocation).
- **The Haven:** Reduction in proposed pitches from 12 to 6. Proposal is now for total of 31 pitches (addition of 6) with improved layout of whole site into three ‘closes’ of development.
- **Waste Lane, Balsall Common:** No change, site withdrawn.
- **Old Civil Service Sports Club:** No change. Remains unavailable as being used for ecological mitigation for the runway extension at Birmingham Airport.
- **Eaves Green Lane, Meriden:** Appeal on adjacent site rejected by Secretary of State in November 2013 due to substantial harm to Green Belt and highway safety.
- **The Pleck:** New site boundary. Unauthorised site with 4 pitches. Enforcement notice served, subject to appeal.
- **Adjacent to the Pleck:** No change.
- **Salter Street:** In a recent appeal decision (June 2012) relating to unauthorised development on this site, the Inspector particularly noted the material harm to the openness of the Green Belt and the significant harm to the character and appearance of the area, resulting from the development.
- **Canal View:** Landowner seeks intensification instead of extension to site.
- **School Road, Hockley Heath:** No change.

Implications resulting from changes to baseline conditions since the 2013 appraisal are presented in the table below.

**Table 1-1: Change in Baseline Conditions**

Site	SA implication
Old Damson Lane	<ul style="list-style-type: none"> <li>• SA Objective 4 – changes from <b>Major positive</b> to <b>Minor Positive</b> to address an error* in the grading attributed for Old Damson Lane in relation to this SA objective Table 7-4 of the Final SA Report (see footnote 1 for link).</li> </ul>
The Warren	<ul style="list-style-type: none"> <li>• SA Objective 4 – changes from <b>Major positive</b> to <b>Minor Positive</b> to address an error* in the grading attributed for The Warren in relation to this SA objective Table 7-4 of the Final SA Report (see footnote 1 for link).</li> </ul>
The Uplands	<ul style="list-style-type: none"> <li>• <b>No change</b> to the appraisal (see Table 7-4 of the Final SA Report (see footnote 1 for link)).</li> </ul>
The Haven	<ul style="list-style-type: none"> <li>• SA Objective 3 – changes from <b>Minor positive</b> to <b>Major negative</b> to address an error* in the grading attributed for The Haven in relation to this SA objective Table 7-4 of the Final SA Report (see footnote 1 for link).</li> <li>• SA Objective 4 – changes from <b>Major positive</b> to <b>Minor Positive</b> to address an error* in the grading attributed for The Haven in relation to this SA objective Table 7-4 of the Final SA Report (see footnote 1 for link).</li> <li>• SA Objective 14 – pollution changes from <b>Minor positive</b> to <b>Neutral</b> to address an error* in the grading attributed for The Haven in relation to this SA objective in Table 7-4 the Final SA report (see footnote 1 for link), reflecting elevated ambient noise levels.</li> </ul>

Site	SA implication
Eaves Green Lane	<ul style="list-style-type: none"> <li>• No change to the appraisal (see Appendix C of the Final SA Report).</li> </ul>
The Pleck	<ul style="list-style-type: none"> <li>• Unauthorised site. Boundary changed.</li> <li>• SA Objective 14 – pollution changes from <b>Minor positive</b> to <b>Neutral</b> to address an error* in the grading attributed for The Haven in relation to this SA objective (see Appendix C of the Final SA Report), reflecting elevated ambient noise levels.</li> <li>• SA objective 16 – effect changes from <b>Minor negative</b> to <b>Major negative</b> as not allocated within the plan thus increases housing need (n.b. allocation of the site would contribute 4 pitches towards the supply of housing).</li> </ul>
Adjacent to the Pleck	<ul style="list-style-type: none"> <li>• SA Objective 14 – pollution changes from <b>Minor positive</b> to <b>Neutral</b> to address an error in the grading attributed for Land adjacent The Pleck in relation to this SA objective (see Appendix C of the Final SA Report), reflecting elevated ambient noise levels.</li> <li>• SA objective 16 – effect changes from <b>Major positive</b> to <b>Neutral</b> due to absence of policy support on the site. Furthermore, the site is not currently in use and the exclusion of land adjacent to the Pleck from the allocated sites would not result in displacement of gypsies and travellers.</li> </ul>
Salter Street	<ul style="list-style-type: none"> <li>• A Local Wildlife Site (Brooklin) is situated to the east of the potential LWS (Lodge Paddocks) that adjoins the eastern boundary of the proposed site.</li> <li>• SA objective 10 – landscape changes from <b>Minor positive</b> to <b>Minor negative</b> to reflect the appeal decision, which concluded that significant harm to the character and appearance of the area would be caused as a result of development on the site.</li> </ul>
Canal View	<ul style="list-style-type: none"> <li>• The existing site and adjacent land to the east is a potential LWS (Lodge Paddocks). A Local Wildlife Site (Brooklin) is situated to the south and east of the site.</li> <li>• As extension is no longer proposed, site is now previously developed land and not greenfield.</li> <li>• SA objective 4 – resource efficiency changes from <b>Minor negative</b> to <b>Major positive</b> as development would be contained within the existing brownfield site.</li> <li>• SA objective 13 – built environment changes from <b>Major negative</b> to <b>Minor positive</b> as development would be contained within the existing brownfield site.</li> </ul>
School Road	<ul style="list-style-type: none"> <li>• <b>No change</b> to the appraisal (see Appendix C of the Final SA Report).</li> </ul>
Old Civil Service Sports Club	<ul style="list-style-type: none"> <li>• <b>No change</b> to the appraisal (see Appendix C of the Final SA Report).</li> </ul>

\*the errors marked with an asterisk in table 1-1 relate to errors in the colour coding used in the Final SA Report (see footnote 1 for link) rather than an error in the technical assessment undertaken.

### Assessment of Main Modifications

An assessment of the Main Modifications has concluded that a change has resulted in the assessment for Sustainability Objectives 4, 9, 11, 13, 15 and 16 (see in Box 2-1 of the Final SA Report (see footnote 1 for link)). These revisions are considered in the table below and are based upon each of the Main Modifications since the 2013 SA report. The key changes are:

- **Uplands:** SA Objective 15 Social/Community - changes from **Neutral** to **Minor positive**;
  - **Canal View:** SA Objective 4 – Resource efficiency changes from **Minor negative** to **Major positive**;
  - **Canal View:** SA Objective 9 – Biodiversity changes from **Major negative** to **Neutral**;
  - **Canal View:** SA objective 11 – Green Infrastructure changes from **Minor negative** to **Neutral**;
  - **Canal View:** SA objective 13 - Built Environment changes **Major negative** to **Minor positive**;
- and

- **Canal View:** SA objective 16 – Housing changes from **Neutral** to **Minor positive**.

**Table 1-2: SA implications of Main Modifications**

Main Modification Reference Number	Summary of changes to the plan	SA implication
1	Clarification on planning policy context to take account of <b>National Planning Policy Framework</b> .	• <b>No implications.</b>
2	Additional text to reflect Inspectors concerns regarding the consistency of the Council's approach with <b>Policy E</b> of the 'Planning Policy for Traveller Sites' to retaining the proposed site allocations within the Green Belt.	
3	Delete paragraphs <b>6.2.2</b> and <b>6.2.3</b> relating to the provision of transit pitches at Old Damson Lane.	• <b>Changes appraised in letter to SMBC (17<sup>th</sup> June 2013) relating to Sustainability Appraisal of the Proposed Amendments to the Pre-Submission Draft.</b>
4	Insert new bullet point, which reads <i>"The design includes measures to promote community safety and social cohesion through measures such as natural surveillance on site."</i>	
5	Amendment to paragraph <b>7.2.3</b> to take account of increased number of sites.	
6	Additional bullet point to include <b>'Canal View'</b> in list of sites.	• <b>No implications.</b> • The effects of changing the number of pitches on the sites and the addition of 'Canal View' as an allocated site are reported below for Main Modifications 8 to 15. Overall, the changes to the number of pitches do not alter the findings reported in 'Table 7-4 Appraisal of the preferred sites coming forward in combination' of the Final SA Report (see footnote 1 for link). <b>No Implications.</b>
7	Amendment to paragraph <b>7.3.1</b> to take account of amendments to phasing of sites.	• <b>No implications.</b>
8 and 9	Amendments to <b>Policy GTS2 – Old Damson Lane</b> . <b>Thirteen pitches</b> to be provided (instead of eleven) Inclusion of Area 3 within phases 1 and 2 to provide flexibility of pitches.	• Two extra pitches on the Old Damson Lane site does not alter the findings of 'Table 7-4 Appraisal of the preferred sites coming forward in combination' of the Final SA Report (see footnote 1 for link), apart from Objective 4 as explained above in Table 1-1. <b>No implications.</b> • The additional pitches are nominally within an area of low flood risk (flood zone 1) SA objective 7. The northern eastern area adjacent to Low Brook and subject to

Main Modification Reference Number	Summary of changes to the plan	SA implication
		<p>flooding could be used for grazing. The pitches could be provided in the south west and outwith the flood risk area. <b>No implications.</b></p> <ul style="list-style-type: none"> <li>Two additional pitches supported by an additional access is envisaged to avoid any health/community issues (SA objective 18) and hence sustains the existing Major positive outcome. The additional pitches would be appropriately designed to help mitigate potential inter-family issues. <b>No implications.</b></li> </ul>
10	<p>Amendments to <b>Policy GTS3 – The Warren.</b> It is proposed that <b>six pitches</b> instead of five will be provided.</p>	<ul style="list-style-type: none"> <li>Permission granted for 6 pitches in May 2014.</li> <li>An arboricultural assessment was undertaken in 2014 recording the amenity value of the trees showing no significant amenity value hence no significant impact from their loss (SA objective 10). <b>No implications.</b></li> <li>The addition of a further pitch does not alter the findings reported in 'Table 7-4 Appraisal of the preferred sites coming forward in combination' of the Final SA Report (see footnote 1 for link) apart from Objective 4 as explained above in Table 1-1. <b>No implications.</b></li> </ul>
11 and 12	<p>Amendment to map of '<b>The Uplands</b>' site (to include access) and <b>Policy GTS4 – The Uplands.</b> It is proposed that the site will accommodate four pitches instead of three.</p>	<ul style="list-style-type: none"> <li>Planning permission granted November 2013 for four pitches. Site allocation is consistent.</li> <li>Planning consent alongside allocation of the site will enable residents to remain on the site (SA objective 15 - Social Deprivation/Social Cohesion) resulting in <b>Minor positive impact.</b> This differs from the neutral impact identified in the Final SA Report (see footnote 1 for link).</li> <li>A further pitch does not alter the findings in 'Table 7-4 Appraisal of the preferred sites coming forward in combination' of the Final SA Report (see footnote 1 for link) aside from those recorded above in relation to SA objective 15. <b>No implications.</b></li> </ul>
13	<p>Amendments to <b>Policy GTS5 – The Haven.</b> The site is proposed to accommodate <b>six</b> pitches instead of <b>twelve.</b> The revised policy requires a comprehensive redevelopment of the site to improve the layout to be conducive to community and individual wellbeing.</p>	<ul style="list-style-type: none"> <li>In terms of SA objective 14 (Pollution), there is expected to be a <b>Neutral impact</b> on residential amenity as there are few neighbouring uses</li> <li>Existing residents are exposed to aviation noise.</li> <li>Allows a few families on the site with possible inter family tensions. However a well-designed revised layout should minimise potential tensions. This modification results in a <b>Neutral impact</b> on SA objective 18 but does not alter the</li> </ul>

Main Modification Reference Number	Summary of changes to the plan	SA implication
		<p>overall <b>Major negative impact</b> identified in Final SA Report (see footnote 1 for link).</p> <ul style="list-style-type: none"> <li>The reduction in pitches proposed does not alter other findings reported in 'Table 7-4 Appraisal of the preferred sites coming forward in combination' aside from those recorded above in table 1-1 in relation to SA objectives 3, 4 and 14. <b>No implications.</b></li> </ul>
14 and 15	Addition of new policy: <b>GTS6 – Canal View.</b>	<ul style="list-style-type: none"> <li>This site was appraised in the SA report supporting the Preferred Options DPD in July 2012 (see 'Appendix C: Findings of the Sustainability Appraisal of the Preferred/ non-preferred sites' (see footnote 1 for link))</li> <li>The existing authorised site and the adjacent land to the east is identified as a potential Local Wildlife Site (pLWS) - Lodge Paddocks.</li> <li>Policy requires proposals to demonstrate absence of potential impact on the pLWS. Inclusion of this modification leads to a <b>Neutral effect</b> on SA objective 9 (biodiversity) rather than a <b>Major negative</b> of the original appraisal.</li> <li>Whilst within Green Belt, two additional pitches are within the existing site thus limited impact on Green Belt, hence <b>Neutral effect</b> on SA objective 11 (Green Infrastructure) rather than a minor negative of the original appraisal.</li> <li><b>Minor positive effect</b> on SA objective 16 (Housing) rather than a <b>Neutral effect</b> as the site allocation would contribute 2 pitches to the identified need.</li> <li><b>No implications</b> on other findings reported in 'Table 7-4 Appraisal of the preferred sites coming forward in combination' of the Final SA Report (see footnote 1 for link) remain.</li> </ul>
16 and 17	Minor amendments to wording of <b>Policy GTS6</b> – Detailed Policy Considerations.	<ul style="list-style-type: none"> <li><b>Changes appraised in letter to SMBC relating to Sustainability Appraisal of the Proposed Amendments to the Pre-Submission Draft.</b></li> </ul>
18	Amendment to table in Policy <b>GTS7</b> – Safeguarding to ensure that the number of pitches on sites to be allocated is consistent with other plan policies.	<ul style="list-style-type: none"> <li>SA implications addressed by modifications to policies GTS 2, 3, 4, 5 and 6.</li> </ul>
19	Replacement paragraph relating to the delivery and monitoring of the plan.	<ul style="list-style-type: none"> <li><b>No implications.</b></li> </ul>
20	Addition of footnote relating to	<ul style="list-style-type: none"> <li>SA implications addressed by modifications</li> </ul>

Main Modification Reference Number	Summary of changes to the plan	SA implication
	policy GTS6.	to policy GTS6.
21	Replacement map for 'The Warren'.	<ul style="list-style-type: none"> <li>• <b>No implications.</b></li> </ul>
22	Replacement proposals map.	

The table in Annex B consolidates the updated SA findings that are outlined above in light of the Main Modifications together with the updated baseline. It provides an update on the assessment presented within Table 7-4 and Appendix C of the Final SA Report (see footnote 1 for link).

We trust that this appraisal of the Main Modifications provides the necessary re-assurance on the outcomes for the sustainable development objectives.

Should you require any further clarifications then we would be pleased to be of assistance.

Yours sincerely  
for **URS Infrastructure & Environment UK Limited**



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## Annex A – Alternatives Appraisal

The table below presents an appraisal of the potential effects of the options presented to accommodate the remaining 6 pitches, which are:

- Option 1: Allocating a new site from the omission sites;
- Option 2: Distributing the remaining pitches across the proposed allocated sites (GTS2 - 4);
- Option 3: Increasing capacity at existing authorised sites to be safeguarded.

SA Objective	Commentary
<p>1. Contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Each of the omission sites considered for allocation as a new site would not conflict with neighbouring uses in a way that would impact upon ‘prosperity’.</li> <li>• <b>Option 2</b> – There is no evidence to suggest that the allocated sites would conflict with any neighbouring economic uses. Should problems exist then distributing the pitches across the proposed allocated sites has the effect of worsening the existing situation.</li> <li>• <b>Option 3</b> – There is no evidence to suggest that the existing sites conflict with any neighbouring economic uses. Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>2. Reduce the number of people with access difficulties to employment, education and training opportunities.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Most of the sites considered for allocation as a new site would have good access to the strategic road network and would therefore provide good access to jobs.</li> <li>• <b>Option 2</b> – There is no evidence to suggest that the allocated sites would negatively affect the ability of gypsies and travellers to access jobs. The allocated sites have good access to the strategic road network.</li> <li>• <b>Option 3</b> – There is no evidence to suggest that the existing sites would negatively affect the ability of gypsies and travellers to access jobs.</li> </ul>
<p>3. Ensure that the location of development makes efficient use of existing physical infrastructure and helps to reduce the need to travel.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Aside from Land off Salter Street, the omission sites perform poorly in terms of reducing the need to travel.</li> <li>• <b>Option 2</b> – Aside from the Haven, the allocated sites are in locations that could reduce the need to travel.</li> <li>• <b>Option 3</b> – In terms of increasing capacity at existing sites, Canal View performs well in relation to this SA objective.</li> </ul>
<p>4. Minimise the use of natural resources, such as land, water and minerals, and minimise waste, increase reuse and recycling and manage within the Borough/Sub-region.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – All omission sites (apart from The Pleck) are on greenfield land and therefore, perform poorly in terms of this objective.</li> <li>• <b>Option 2</b> – As Gypsy and Traveller sites may sterilise adjacent land, distributing the remaining pitches across the proposed allocation sites may avoid any worsening of the baseline situation (as the site area is not increased).</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>5. Minimise greenhouse gas emissions, reduce energy use, encourage energy efficiency and renewable energy generation.</p>	<ul style="list-style-type: none"> <li>• Additional energy infrastructure may be viable at larger sites, but ability would be equal across Options 1, 2 and 3.</li> </ul>
<p>6. Assist in the adaptation businesses need to become resource efficient and also deliver more sustainable</p>	<ul style="list-style-type: none"> <li>• No significant effects would result from Options 1, 2 and 3.</li> </ul>

<p>equipped to a changing market place caused by climate change.</p>	
<p>7. Manage, maintain and where necessary improve drainage to reduce economic losses from flooding.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Three of the omission sites have a surface water flood risk issues, whereas three have no issues.</li> <li>• <b>Options 2</b> – Distributing the remaining pitches across the proposed allocation sites could give rise to increased flood risk depending upon the sites selected and layout proposed.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>8. Ensure that development provides for adaptation to urban heating and high winds.</p>	<ul style="list-style-type: none"> <li>• No significant effects would result from Options 1, 2 and 3.</li> </ul>
<p>9. Enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – With the exception of School Road, all omission sites are located close to or on a Local Wildlife Site (LWS) or potential LWS. Use of these sites could have an impact on these areas.</li> <li>• <b>Option 2</b> – None of the proposed allocated sites would directly affect a local nature conservation site although Damson Lane, the Warren and the Haven all lie adjacent or in close proximity to local wildlife sites. Therefore, distributing the pitches across the proposed allocated sites could have an in-combination effect on the SA objective.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>10. Manage the landscape effects of development in recognition of the European Landscape Convention as well as risks and opportunities associated with measures to address climate change.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – The effects of a new site on the surrounding landscape would be dependent upon its scale but most of the omission sites would have an adverse impact on landscape.</li> <li>• <b>Option 2</b> - No significant landscape effects were identified in the Final SA report (see footnote 1 for link) for Damson Lane, the Warren, the Uplands and the Haven. It is unlikely that distributing the remaining pitches across the allocated the sites would lead to significant landscape effects.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have similar impacts to those identified in Option 2.</li> </ul>
<p>11. Facilitate the delivery and enhance the quality of areas providing green infrastructure.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – With the exception of School Road, all perform poorly in terms of impact on green infrastructure.</li> <li>• <b>Option 2</b> – With the exception of The Uplands, all perform poorly in terms of impact on green infrastructure.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would not result in significant effects.</li> </ul>
<p>12. Enhance, conserve and protect buildings, sites and the setting of historic assets to the urban environment as part of development projects.</p>	<ul style="list-style-type: none"> <li>• No significant effects would result from Options 1, 2 and 3.</li> </ul>
<p>13. Deliver improvements in townscape and enhance local distinctiveness.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Most of the omission sites perform poorly in terms of this objective, with the exception of The Pleck and Land adjacent to The Pleck, which are smaller in scale.</li> <li>• <b>Option 2</b> – Three of the four sites proposed are located in areas dominated by commercial and urban influences. Use of the allocated sites is unlikely to have a significant effect on local distinctiveness or areas of visual townscape prominence.</li> <li>• <b>Option 3</b> – Although located within a sensitive location, the additional pitches at Canal View would be contained within the existing brownfield site, therefore, reducing the impact on the distinctiveness of the surrounding area.</li> </ul>

<p>14. Minimise air, soil, water, light and noise pollution.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Within the exception of School Road and Eaves Green Lane, the omission sites are unlikely to have significant effects on pollution.</li> <li>• <b>Option 2</b> – The Haven is exposed to aviation noise. Additional pitches on other allocated sites are unlikely to result in significant effects in terms of pollution.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have similar impacts to those identified in Option 2.</li> </ul>
<p>15. Improve community capital and reduce social isolation across the social gradient.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Should a new site allow family groups on unauthorised sites move to authorised sites and remain together then positive effects could result. However, if several family groups need to share allocated sites, then this could be to the detriment of well-being.</li> <li>• <b>Option 2</b> – Distributing the pitches across the proposed allocated sites can allow families to live together on existing sites which has the potential for significant positive effects. However, where sites are expanded with a view to encouraging more families to live on the same site, there may be significant negative effects in terms of community and individual well-being.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>16. Improve the supply and affordability of housing in those areas of greatest need.</p>	<ul style="list-style-type: none"> <li>• <b>Options 1, 2 and 3</b> all address Gypsy and Traveller accommodation needs, therefore, having positive effects.</li> </ul>
<p>17. Ensure the Borough's national and regional assets reflect wider needs.</p>	<ul style="list-style-type: none"> <li>• No significant effects would result from Options 1, 2 and 3.</li> </ul>
<p>18. Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality to reduce health inequalities and promote healthy lifestyles.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – Should a new site allow family groups currently on unauthorised sites move to authorised sites, and remain together then positive effects are likely. However, if several family groups are forced to share newly allocated sites, then this could be to the detriment of well-being.</li> <li>• <b>Option 2</b> – Distributing the pitches across the proposed allocated sites may allow families to live together on existing sites which has the potential for significant positive effects. However, where sites are expanded with a view to encouraging more families to live on the same site, there may be significant negative effects in terms of community and individual well-being.</li> <li>• <b>Option 3</b> – Increasing capacity at existing sites would have the same impact as Option 2.</li> </ul>
<p>19. Reduce crime, fear of crime and anti-social behaviour.</p>	<ul style="list-style-type: none"> <li>• The effects in terms of crime for all three options (Options 1, 2 and 3) are unclear. However, any potential adverse effects could be mitigated to a certain extent through appropriate design.</li> </ul>
<p>20. Enhance public safety.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – School Road, Eaves Green Lane and the Old Civil Service Sports Club all perform poorly in terms of public safety.</li> <li>• <b>Option 2</b> – All of the proposed allocated sites perform well in terms of this objective.</li> <li>• <b>Option 3</b> – Canal View performs well in terms of this objective.</li> </ul>
<p>21. Encourage development with better balance between jobs, housing and services, and provide easy and equitable access to opportunities, basic services and amenities for all.</p>	<ul style="list-style-type: none"> <li>• <b>Option 1</b> – With the exception of Land off Salter Street, all omission sites perform poorly in terms of this objective.</li> <li>• <b>Option 2</b> – Apart from The Haven, all of the proposed allocated sites perform well in terms of this objective.</li> <li>• <b>Option 3</b> – Canal View performs relatively well in terms of this objective.</li> </ul>



