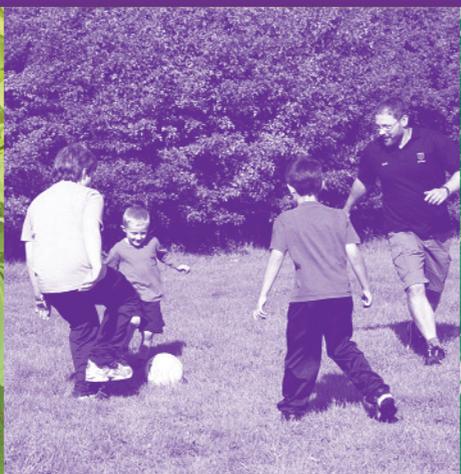




Gypsy and Traveller Site Allocations Development Plan Document Options Paper Consultation: Summary of Representations Received

Solihull Local Development Framework

October 2011



Solihull Local Development Framework
Gypsy and Traveller Site Allocations Development Plan Document Options Paper Consultation – July and August 2011
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Introduction

This document provides a summary of all representations received to the Gypsy and Traveller Site Allocations Development Plan Document Options Paper consultation. Each respondent is individually coded for ease of reference. This document follows the order and addresses the questions posed in the Options paper.

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The Evidence Base:

1. Do you still consider the Solihull Gypsy and Traveller Accommodation Assessment to be the most appropriate way of identifying the accommodation needs of Gypsies and Travellers in Solihull to 2017? If not, why not?

6	Planning Consultant	<p>No. The Solihull GTAA omitted consideration of the use made of Trevallion Stud Balsall Common by some 5 families (see evidence to Meriden Inquiry) and the site at Leam Corner. It therefore understates the need to 2017 and should be updated.</p> <p>There is still concern about the site known as the Haven or the Clock at Catherine de Barnes. According to the current application for a site adj The Pleck, Shadowbrook Lane the owner intends to close the site and sell the land to the airport. If this is the case a suitable replacement site will need to be found. The unauthorised development at Shadowbrook Lane is additional to the sites at the Haven, Catherine de Barnes which is full, which suggests that the current need is larger than that assessed in 2007.</p> <p>The site at Eaves Green Lane is additional need for families displaced from Trevallion Stud. The owner of Trevallion Stud has told the Council that he does not wish to be considered as a Traveller site and no longer makes provision for the families now stopping at Eaves Green Lane.</p>
11	Parish Council	The PC does not have any other evidence to hand which would enable it to offer an alternative view or to challenge the assumptions made in the Accommodation Assessment.
13	Parish Council	Yes.
15	Parish Council	Yes, as the most current and up to date assessment available.
17	Action Group	<p>Gypsy and Traveller Accommodation Assessments (GTAAs) are, generally speaking, the most robust evidence when considering accommodation provision and need for Gypsies, Travellers and Showmen. A lot of resources went into these assessments and it would be a waste of resources if these were not used to form the evidence base, or at least the major part of it. Additionally, it is worth noting that at the moment, the Government still intends that GTAAs will be carried under section 225 of the Housing Act 2004, and there has been no indication that this requirement is to be changed. As your consultation documents notes, however, in terms of planning policy development, the consultation draft PPS for Traveller sites refers only to „robust evidence’. In reality it is very unclear what this would comprise, and whilst GTAAs are still in existence, there would not appear to be any benefit in compiling evidence from scratch.</p>
21	Individual	<p>Yes, I do still consider the Solihull Gypsy and Traveller Accommodation Assessment to be the most appropriate way of identifying the accommodation needs of Gypsies and Travellers in Solihull to 2017. However, it should be updated annually in the light of any significant changes in needs and other circumstances (Question 2).</p>

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25	Action Group	The GTAA forms the best available evidence to hand and should thus be used as a basis for future planning.
26	Residents Association	Yes, the GTAA provides the most definitive and robust method of determining accommodation need.
27	Residents Association	Yes, the GTAA provides most reliable and robust evidence to establish need. If this is a proven fact why change this procedure. In answer to the new draft PPS refers to addressing needs of Travellers in the "light of historical demand". Do we assume "historical demand" needs come from the GTAA, as no other document appears to be mentioned, then I see no reason other than to continue with the GTAA.
28	Individual	No, the GTAA is no longer relevant. It identified need in 2008 based on a different set of guidance set by a different government. The current government have made it clear that local authorities can assess the need for themselves based only on evidence "in light of historical demand". Solihull has had very little historical demand. They have also made it clear that proposing sites on greenbelt land will be inappropriate development. Solihull MBC should re-assess the need based only on what they are required to base the assessment on, otherwise, there will be an over assessment of need which will create a demand for migration into Solihull from other Boroughs where they are assessing need only as they are required to. Furthermore, the government is still under consultation regarding gypsy and traveller sites and to what extent they should be included in planning legislation. Until that consultation closes and clear guidance is produced, Solihull council should delay making decisions based on an old set of guidance that no longer reflects national policy.
29	Action Group	Yes.
30	Individual	Yes.

2. Should the evidence base be updated to identify the accommodation needs of Gypsies and Travellers in Solihull to 2017? If so, in what ways does it need updating?

6	Planning Consultant	Yes. The evidence base needs to be updated as noted previously and to include provision for the families at Eaves Green Lane Meriden and elsewhere if there is need to do so.
11	Parish Council	The PC would expect accommodation needs to be subject to annual review in order to justify assumptions made. However, The PC is very concerned that Page 7 refers to an additional 8 pitches that „could come forward if planning applications to regularise existing, well established sites in the Borough, which do not currently have permanent planning permission were successful.’ The PC has made it clear that it has the strongest objection to the current unlawful site in Shadow brook Lane and would be very concerned

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		should the above statement suggest that the Council is considering allowing the unlawful occupation of Green Belt land to continue. Solihull has set out draft „Policy considerations’ on Page 10 of its Development Plan Document and the PC would consider it perverse in the extreme should the Council choose to ignore these eminently sensible criteria by allowing occupation to continue.
15	Parish Council	The GTAA identifies need in Solihull to 2017. This is a forecast figure in an ever-changing world. Local assessments should be on-going to meet change.
17	Action Group	Referring to the answer given previously, whilst we do not think that assessments of need should be started from scratch, there may be a need to consider any changes in circumstances since the GTAA was undertaken. Discussion with the local Gypsy and Traveller community is vital to establish whether or not there have been any significant changes. For example in the GTAA it noted on page 82 that The Haven site will be adversely affected by the expansion of Birmingham Airport, and that the pitch figures do not reflect any need arising from the residents of this site. Clearly this could affect the need arising in the Borough. National factors too, such as the eviction of people on other sites (most notably Dale Farm in Essex) and the slow rate of provision of new sites emphasises the need to work jointly with other local authorities to ensure appropriate provision is made and that changing circumstances are acknowledged. Another issue of course is that the assumptions used in the GTAA have yet to be tested, for example the assumptions used in the pitch calculations, so whilst the GTAA is the best evidence of need, it might be worth revisiting some of these assumptions and seeing if they reflect the picture on the ground.
25	Action Group	Clearly future needs beyond 2017 will have to be securely identified. In our view a GTAA taking into account lessons learnt during the first round of GTAAs should be undertaken in due course. It should focus primarily on ensuring that a full and accurate assessment is made of the Gypsy and Traveller population, including those in housing, needs to be made and that needs are fully assessed. Any future assessment of need will need to ensure that the cooperation of local gypsies and travellers is an integral part of the needs assessment exercise. Experience from elsewhere has shown that this approach will help ensure that all needs are identified and it will help form the basis of an ongoing dialogue between the Gypsy and Traveller community and those concerned with ensuring that provision for their needs are made.
26	Residents Association	An assessment should be undertaken across the Borough, of all , long established sites, in order to ensure that need is fully identified and to provide further resilience to Solihull's assessment .
27	Residents Association	Yes. If evidence not updated how would it be possible to judge future needs for the accommodation needs of Gypsies & Travellers. The GTAA, albeit no longer required by LPA, if GTAA has in the past given reliable information for accommodation needs why not continue to adopt this format albeit if need be under a different title.

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28	Individual	Yes, it needs updating, the GTAA is no longer relevant. Needs only need to be assessed based on historical demand.
29	Action Group	Yes, the published evidence is probably out of date (2008). Whether the 2011 census of population will provide a better data base is not known. However, it should be examined to marry the data to general housing demand.
30	Individual	Yes, it needs to reflect cases where pitches have been displaced either by the Council or for example by the proximity of the Airport runway extension to the Haven caravan site.

3. What other ways are there to identify the accommodation needs of Gypsies and Travellers in Solihull to 2017?

6	Planning Consultant	As noted in C 1/2006 Regard should be had to other appeals/ applications. Need to speak to the Travellers themselves as they often have a good idea of the need for more sites from within their community.
11	Parish Council	The PC feels unable to suggest alternatives but is alarmed at the suggestion on page 8 that the Council should provide temporary accommodation for people visiting site residents. Our view is that this would simply provide another planning loophole to be exploited which would see the gradual expansion of sites and accommodation without gaining the formal planning permission required of the settled community.
13	Parish Council	All Gypsies and Travellers to register with the Local Authority.
15	Parish Council	Continuing consultation, statistical analysis etc.
17	Action Group	As noted in question 2, it is very important to speak to the local Gypsy and Traveller community, as well as the Showmen's Guild. The consultation document notes on page 7 that there is a reference in the draft PPS to accommodation needs "in the context of historical demand". This is of course open to interpretation and would not in itself be a sound basis on which to form planning policy. For example such an approach would never apply to affordable housing (there wasn't a need before so there won't be a need in the future'). Historic demand is one aspect of looking at provision, but should not be the only factor.
26	Residents Association	The latest Census incorporated collection of data on accommodation and ethnicity, including Gypsies and Travellers, which may inform accommodation need.
27	Residents Association	Cannot specifically answer this direct question. I believe Universities do undertake Market Researches for various organisations.
28	Individual	The recommended way to identify need is based on historical demand.
30	Individual	Annual counts and anecdotal evidence.

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Gypsy and Traveller Accommodation Need Beyond 2017:

4. Is the application of the Solihull Gypsy and Traveller Accommodation Assessment household formation rate an appropriate way to identify Gypsy and Traveller accommodation need in Solihull beyond 2017? If not, why not?

6	Planning Consultant	Yes. This accords with guidance in other GTAAs (ie 3-4% growth rate).
11	Parish Council	The PC is concerned and expresses surprise that a figure of 4% annual increase in household formation rate has been assumed. Any figure (increase or decrease) should be evidence based and part of the annual review process (see Q2) and not based on an assumption of growth.
13	Parish Council	No. All Gypsies / Travellers should ideally be registered.
15	Parish Council	Statistical evidence is a sound basis for identifying future need.
17	Action Group	No. In the absence of any other data, then a household formation rate may be the only option, but this should not form the basis of a robust evidence base. Since a GTAA is still required under the Housing Act 2004, then the most sensible option is to use that assessment, which should be updated every five years. It is much more appropriate to plan an update of the evidence base than to rely on a household formation rate that has not been thoroughly tested. In addition, there are the factors mentioned previously which could relate to levels of provision needed, such as the impact of the airport expansion, that a standard household formation rate would not take into account.
25	Action Group	Plans should be made now on the basis of a compound increase to take account of family formation until an updated needs assessment has been carried out.
26	Residents Association	Yes, with qualification - This would seem to be a sensible approach as an indication of likely need post 2017, however, given the numerical level of need is low relative to the settled population, this would need to be updated periodically (say every 5 years) to prevent under or over provision.
27	Residents Association	No. Being unaware of the precise data provided by the GTAA we are told an estimate of need could be made using the current family formation rate identified in the GTAA and this is around 4%. However, to utilise this percentage beyond 2017 until 2026 (15 years hence from 2011) seems to be pure guess work and not reliable. We are not told how the 4% is calculated and if this represents a pattern over the previous 15 years. Presumably the term 'pitch requirement' and 'family formation rate' bear some correlation as regards the number of caravans per site.
28	Individual	No, the GTAA is no longer relevant. Solihull council should wait for the government consultation to close, and they receive clear up to date guidance. Nevertheless this government has made it clear that councils are no longer required to assess need as they were in 2008. Future pitch requirement should

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		be based only on historical demand, which in Solihull has been very small. Why would the council want to over inflate need, based on assessment criteria they are no longer bound by? We are a very small borough, why create a demand and then be unable to meet needs?
29	Action Group	The 2011 census of population should provide a better start point to determine family formation rates. This could help update the evidence base.
30	Individual	Yes.

5. Should the evidence base be updated to determine Gypsy and Traveller need in Solihull beyond 2017? If so, in what ways does it need updating?

6	Planning Consultant	Yes – the GTAA evidence base should be updated every 5 years.
11	Parish Council	See Q4.
13	Parish Council	No.
15	Parish Council	As with everything, regular reviews should be undertaken. Further evidence should be gathered over the coming years to create a forecasted need beyond 2017.
17	Action Group	Yes. The GTAA should be updated, with significant involvement and input from the local Gypsy and Traveller community.
25	Action Group	As mentioned previously the GTAA will require revisiting to properly assess needs beyond 2017 but there is no reason not to plan now on the basis of the best available evidence post 2017 ie an assumed family formation rate until better information becomes available.
26	Residents Association	Yes, see Q 4. This will also enhance the robustness of the evidence base.
27	Residents Association	No. For reasons given to Q4. Exception being if the 4% growth bears a relationship to the past 15 years.
28	Individual	Yes, it should be updated to reflect the guidance that will be issued by this new government.
29	Action Group	Yes, as the text leading to this question notes. The information could be helped by using the Eaves Green Lane, Meriden appeal information.
30	Individual	Yes - by targeting families and engaging with the GLA.

The Approach to Meeting Need:

6. Are the approaches to the way in which our future pitch requirement may be met considered appropriate? (Expansion of existing authorised Gypsy and Traveller Sites; Increasing capacity on existing authorised Gypsy and Traveller Sites; Allocation of new sites.)

6	Planning Consultant	Yes – options listed seem appropriate. I also advise a requirement to safeguard existing sites and to ensure that if there is pressure to
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		redevelop them suitable alternative provision should be found/ made available as part of the planning process.
11	Parish Council	The PC considers that there would be enormous concern if unlawful sites were permitted to remain. The PC believes that the obligation should be on Solihull Council to identify appropriate Social Sites (Council Owned) in order to ensure proper supervision of sites, services and payment of dues including Council Tax. The PC considers the 17% option of socially rented pitches (based wholly on respondents preferences in a survey) is flawed, would be seen as an abrogation of responsibility, and that its adoption would encourage further unlawful occupation of private or family owned land in unsuitable locations without planning permission. The PC urges the Council to adopt a more positive approach with an assumed target of at least 50% Social Sites.
13	Parish Council	Yes. Existing site numbers appear adequate.
15	Parish Council	Yes.
17	Action Group	All these options are reasonable, but their appropriateness will depend on local needs and circumstances. In particular the first two options would depend on circumstances of the site and the views and needs of residents on those sites, as well as other planning considerations. Allocations also need to be appropriate, for example if allocations are made which do not meet the needs of Gypsies and Travellers, by virtue of their size, location, or other factor, then these sites would not meet need, so again community consultation is vital. I would suggest that a preferred approach should encompass all of the options put forward, but should also encourage Gypsies and Travellers to bring forward sites themselves.
21	Individual	I believe that future pitch requirements should be met, so far as possible, by increasing capacity on existing Gypsy and Traveller sites. If that does not provide sufficient capacity, the expansion of existing sites should be considered. I do not favour the allocation of new sites.
24	Internal	I would be cautious of a blanket rule to expand/increase capacity on existing sites and suggest that this be assessed on a site by site basis. In addition to other issues around sustainability (such as access to local facilities, transport etc) some of the existing sites are adjacent to Sites of Special Scientific Interest, Local Wildlife Sites and other statutory/non statutory designated sites of nature conservation value. It may not therefore be feasible to expand due to potential adverse direct/indirect impacts on these sites. Assessment should also consider the protection of designated and non designated heritage assets, landscape quality/ local distinctiveness, tranquillity and openness of the Countryside.
25	Action Group	All three options should be explored in ongoing direct consultation with local gypsies and Travellers.
26	Residents Association	Yes - providing the expansion of existing sites does not compromise the sustainability of the site in terms of its relationship with the settled community and local infrastructure. The same applies to

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		increasing capacity on existing sites. Where the allocation of new sites is considered, no site should be located where it compromises the purposes of Green Belt.
27	Residents Association	Yes.
28	Individual	No, they are not appropriate. We should not assume that we will not be able to meet our obligations to meet future need, future need should be properly re-assessed based on what the new government says the obligations are. Notwithstanding that it is clear that future need be based only on historical demand, so why the assumption that there will need to be an increase in provision? Solihull is a small borough, if we allow current sites to be expanded, or have increased capacity this could lead to the creation of “super sites” like Dale Farm. This is particularly true given that we know on existing sites expansion is already going on without planning permission and in the face of enforcement notices. This then takes years to take back to legally granted limits, not to mention the cost to those who pay taxes.
29	Action Group	The potential loss of 'The Haven', Bickenhill site and the other permissions granted in 2011 would indicate that new sites will be needed but only if demand exists.
30	Individual	Yes.
39	Action Group	The Trust welcomes the review of existing sites to determine the relative suitability of each option with regards to the assessment criteria. However, we are firmly of the opinion that this assessment should be undertaken independently of whether or not a site is currently the subject of a planning application or if it has been granted temporary planning permission. It should be noted that some sites have been granted temporary permission solely on the absence of suitable alternatives at that time of application and therefore these sites should not be seen as preminent to other more sustainable sites on this basis. Indeed, paragraph 46 of OPDM Circular 01/2006 states that the grant of temporary permission should not be seen as setting a precedent for granting full permission to use the land as a caravan site and so existing applications and temporary permission should not afford weight in the assessment criteria.

7. Of the three approaches outlined, do you have any preference for how need should be met?

6	Planning Consultant	No preference but I would advise against making any site too large. The preference generally is for small family sites for different ethnic groups. The site at The Haven, Catherine de Barnes is overcrowded and the accommodation is sub standard. It operates more as a transit site without individual plots and individual amenity blocks. There is a need to avoid similar site cramming elsewhere.
11	Parish Council	See Q6.
13	Parish Council	Allocation of new sites using brownfield sites.

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15	Parish Council	It is felt that expansion and increased capacity of existing sites should be given first consideration, as an opportunity to increase an existing community must be preferable to smaller isolated sites where local amenities are / maybe insufficient.
17	Action Group	See previous question. Selecting just one rigid approach could prevent suitable and appropriate sites from coming forward.
25	Action Group	What approach is most sensible would be informed by the council talking directly to local Gypsies and Travellers.
26	Residents Association	Immediate need to 2012 should be met through the expansion or approval of existing established and tolerated sites. This will negate unauthorised development. Need to 2017 and beyond should be achieved through a combination of sensible expansion of existing sites and allocation of new sites (this providing time to indentify appropriate locations and consult with existing populations).
27	Residents Association	Wherever possible increase existing and expansion of authorised Gypsy & Traveller sites.
28	Individual	No, I do not agree that there is any future pitch requirement based on historical demand.
29	Action Group	See answer to question 6.
30	Individual	One or two, rather than three.

8. Are there any alternative ways in which our future pitch requirements may be met?

6	Planning Consultant	Cannot think of any alternative way to meet future pitch requirement.
11	Parish Council	None so far as we know.
13	Parish Council	No.
17	Action Group	See answer to questions 6 and 7– the approach to provision should be flexible enough to ensure that all the options can be pursued if appropriate, plus Gypsies and Travellers should be encouraged to bring forward appropriate sites themselves.
25	Action Group	Certainly sites currently without the benefit of full or no planning permission should be examined with a view to regularisation.
26	Residents Association	No.
27	Residents Association	Expansion of existing Gypsy & Traveller sites.
28	Individual	Yes, Solihull council should make alternative provision for Travellers who are clearly no longer travelling, who want to educate their children long term in local schools and attend local hospitals, and integrate into the local community. Their need for housing should be included along with all other Solihull residents need for housing, and make appropriate council housing provision for all.
29	Action Group	Areas away from Green Belt should be examined in more detail. It is clear from the Eaves Green Lane,

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		Meriden appeal that employment should be considered as a determinant of pitch locations and numbers.
30	Individual	No.

Call for Sites:

9. Can you suggest any sites that you consider suitable for use as Gypsy and Traveller sites?

6	Planning Consultant	Consideration should be given to the site at Eaves Green Lane Meriden given that the only real objection sustained at the recent Inquiry was definitional harm to the Green Belt which will apply to any site in the Green Belt.
11	Parish Council	No.
13	Parish Council	Not within Bickenhill parish Council area.
17	Action Group	I am sending with this consultation response a letter which we wrote some time ago in connection with „Call for Sites’ requests. Planning Gypsy and Traveller sites as part of all larger housing developments, such as urban extensions, would begin to address historic under-provision and start to create an element of choice for Gypsies and Travellers, which at the moment does not exist and which is taken for granted by settled communities. The number of pitches to be included could be calculated as a proportion of the overall amount of housing. Such pitches could also be funded by planning obligations if they are to be socially rented since they are classed as affordable housing.
25	Action Group	Again an outreach exercise should be undertaken locally to enable direct and accessible communication with the local Gypsy and Traveller community.
26	Residents Association	No.
27	Residents Association	No.
28	Individual	This “call for sites” scheme is completely ludicrous, irresponsible, naive, and clearly not thought through. This will lead to local landowners and landlords, including gypsy landowners who were encouraged to buy land when councils were no longer required to make provision for gypsy sites, to put land forward with no regard to local residents, environmental issues etc, so that they can make a profit, The profit again being at the expense of local residents who pay taxes. It will also be at the expense of local residents who have their own property / land that will subsequently become completely devalued.
30	Individual	Valley Road, Earlswood [However, no other detail supplied – More information has been requested but this has not been forthcoming].
31	Individual	Land between Waste Lane and Old Waste Lane, Balsall Common.

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Consideration of Gypsy and Traveller Related Development:

10. Should detailed policy considerations for Gypsy and Traveller related development be included in the Gypsy and Traveller Site Allocations DPD?

6	Planning Consultant	No. I would have thought this was a matter for the criteria policy in the Core Strategy.
11	Parish Council	Yes.
13	Parish Council	Yes.
15	Parish Council	Yes.
17	Action Group	No. Such details should be assessed on their individual merits through the development control process. It would be very unlikely to find a policy for mainstream housing that asked for equivalents of these criteria in policy (for example the keeping of animals, since many people in mainstream housing also keep animals) and it would be an unfair burden on applicants where those criteria are not relevant (such as „clearly defining’ individual pitches on a small family site). However there may be aspects that could be included as guidance (see answer to question 13 below).
24	Internal	Yes.
25	Action Group	Rather than set out detailed policy considerations it might be simpler to simply refer to the Good Practice Guide which contains most information required. Detailed proposals are best developed by pre-application discussion. This will help ensure that maximum flexibility can be attained in terms of site design and usage which will of course vary with the site concerned.
26	Residents Association	Yes, it is crucial that the policy considerations are available in the DPD, in order that sites are located in appropriate locations.
27	Residents Association	Yes.
28	Individual	Detailed policy considerations should be included in exactly the same way as they are for any other residents applying for planning permission. However, what is more important and what has eluded Solihull council so far, is active enforcement of policies through planning permissions, and if not complied with, or flouted, through revocation of permission / enforcement action. Policies are meaningless unless they are actively implemented. Furthermore, this is a very naive approach and does not reflect the true situation where expansion / development / building is carried out without planning permission anyway. Of those considerations listed, of course they are relevant, however different situations will arise where it would be wrong to apply the policy suggested. For example, where gypsy sites have been expanded, developed, built upon without planning permission, or inappropriately on green belt land, then high

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		<p>screening may be appropriate to enable other residents to have peaceful enjoyment of their own homes. This would also be true where the landscape has been so irreversibly altered by unauthorised and inappropriate development so that natural landscapes no longer exist.</p> <p>Regarding animals it is not enough to have knowledge of animals proposed on site, but also clear guidelines on noise levels as other residents are required to comply with.</p> <p>Regarding commercial activity, again it is not enough to know if commercial activity is to take place, the same planning laws should be enforced as for any other residents. The council is not to discriminate in terms of provision of housing and services, they are not required to provide rent free, tax free commercial premises, just as the general population would not be allowed to run a commercial business using heavy duty plant machinery and vehicles from their homes.</p> <p>Regarding lighting, again the same rules should apply in terms of creating nuisance and disturbance that apply to all residents.</p>
29	Action Group	It is not clear why a DPD is required. The policies could be included in the main policies.
30	Individual	Yes.

11. Do you think that the detailed policy considerations listed are the right ones?

6	Planning Consultant	Yes but the CLG guidance is intended for socially provided sites and should not be relied on for privately provided site for which no grant aid is available. Clarification is needed why details of the keeping of animals is necessary. It might be simpler to note that regard will be had to site licence issues.
11	Parish Council	Yes, the PC supports the Policy considerations as an appropriate way to determine the suitability of sites. The PC believes it is also vital to include consideration of the effect on the settled community (not currently listed in the criteria) See Q12.
13	Parish Council	Yes.
15	Parish Council	Yes.
17	Action Group	No. These detailed criteria are superfluous as they relate to detail or design issues that would be assessed during the development control process as a matter of course. Several of these issues could be controlled by the use of a condition (such as commercial activity or lighting). Requesting such information from all applicants would put an unfair burden on applicants.
24	Internal	They are a good starting point, although there is no reference to ecology/biodiversity.
26	Residents Association	Yes.
27	Residents Association	Yes. The considerations are acceptable but not to be automatically granted. My reasons are

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		no statistics appear to be shown to support for example as to numbers of Travellers/Gypsies seeking transit accommodation in Solihull and therefore the need for separate transit pitches.
28	Individual	See Q10.
29	Action Group	Yes. However they should be more precise e.g. a precise level for external lighting must be stipulated. Check that considerations are enforceable.
30	Individual	Yes.

12. Are there any other detailed policy considerations that need to be identified?

6	Planning Consultant	Not aware of any.
11	Parish Council	The PC suggests the inclusion of additional criteria: -The effect on the settled community. -The effect on the environment and the avoidance of locations close to environmentally sensitive areas including SSI's. -Consideration of the effect of both noise and light pollution on neighbouring properties or areas in close proximity (emanating from commercial or domestic activity.) -The close supervision and monitoring of any commercial activity (with an assumption that planning permission (change of use) is required for any such activity.
13	Parish Council	No.
17	Action Group	No, and see answer to questions 10 and 11.
24	Internal	As stated previously an ecology/biodiversity policy consideration should be incorporated. Suggested wording: Ecological assessments should be undertaken, where appropriate; direct/indirect impacts on protected/priority sites, habitats and species should be outlined and adequate mitigation proposed as required. Green infrastructure requirements should be integrated into the design of proposed schemes.
26	Residents Association	No.
27	Residents Association	If there is an actual need for new sites then the location of these requires careful consideration. Sites to be a reasonable distance away from the local populous to minimise disturbance and nuisance to local residents.
28	Individual	See Q10.
29	Action Group	Limits on size of motorised vehicles on a site e.g. engine capacity, vehicle weight, vehicle height.
30	Individual	No.

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13. Have you got any other comments to make about the detailed policy considerations?

6	Planning Consultant	No further comment.
11	Parish Council	No.
13	Parish Council	Council charges should be applied across the site.
17	Action Group	If detailed aspects such as these are to be included, then it should be as guidance, not policy, as they are detailed issues which relate to design or layout and cannot be prescribed.
24	Internal	No.
25	Action Group	We have concerns that the list of considerations are very detailed and over onerous.
26	Residents Association	Policy 5 - The word 'normally' should be removed from 'Sites in the Green Belt...' and from 'Development in the Open countryside...'
27	Residents Association	Containment of sites of whatever description to be kept at all times to a minimum. All sites to be used in perpetuity.
28	Individual	See Q10.
39	Action Group	Whilst all strategic site allocations should have taken account of biodiversity constraints in their initial selection, it may still be necessary to consider ecological impacts on a site by site basis. In turn, Ecological Assessments should be undertaken, where appropriate, to determine likely impacts on protected species and/or priority Local Biodiversity Action Plan (LBAP) species and habitats. Where such impacts are likely, it may be necessary to undertake mitigation measures on site and within landscaping schemes to avoid a net loss of biodiversity, in accordance the principles of PPS9, and to avoid contravention of current wildlife legislative provisions. Site ecological assessments must be undertaken prior to any development being undertaken on site and so should be included in the application requirements listed in this section. The Trust supports the inclusion of landscaping plans as an application requirement for approved site allocations. We believe that landscaping should aim to complement and enhance the existing landscape character by using predominantly native species of local origin and by taking account of surrounding land uses and other planning policy objectives, such as those listed in the Solihull Nature Conservation and Countryside Strategies.

Tenure:

14. Should the Council be identifying socially rented pitches as part of the overall pitch requirement for the Borough?

6	Planning Consultant	Yes. Not all Travellers have the means to self provide. As with the settled population there is a need to
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		provide choice and security. Privately run sites do not provide security for those renting pitches.
11	Parish Council	Yes, definitely -see our response to Q6 and 7.
13	Parish Council	No.
15	Parish Council	Yes.
17	Action Group	Yes. As noted in your consultation document, there will always be people who cannot provide their own sites, and a range of site types and tenures will always be necessary to meet need appropriately.
23	Internal	The Council is committed to providing Affordable Housing to all groups within the community including Gypsies and Travellers.
24	Internal	Yes.
25	Action Group	Clearly there will always need to be ongoing provision to meet needs for socially rented pitches and in our view these should be identified.
26	Residents Association	Yes, there will always be some who are unable to afford their own development. It also brings consistency with housing for the settled community.
27	Residents Association	Yes.
29	Action Group	No.
30	Individual	Yes.
32	Individual	Yes, need to make provision for Travellers who are unable to find / afford their own site.
33	Individual	Permanent social sites are needed for those who cannot afford to buy their own land.
35	Individual	Council owned sites should be provided for those who cannot afford their own land.
36	Individual	Social sites do not work. They become dominated by one family which puts other families off and there would be no control over who resides there.

15. Is it appropriate that 17% of the total number of pitches to be provided in Solihull between 2012 and 2026 be available as socially rented pitches based on the findings of the Solihull Gypsy and Traveller Accommodation Assessment?

6	Planning Consultant	Unable to comment.
11	Parish Council	The PC would wish to see all Gypsy and Traveller sites being socially rented. However, as an interim step, the PC believes it would be appropriate for Solihull Council to adopt a target figure of 50% Social Sites in order to discourage and prevent the illegal occupation and development of other land, whether private or family owned. Socially rented sites would also ensure conformity to the draft Policy considerations (criteria). (See Q12).
13	Parish Council	No.
15	Parish Council	Yes.

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17	Action Group	This seems like a reasonable approach to take, given the evidence base. However the figure should be reviewed when updating the GTAA, given that the percentage relating to mainstream affordable housing is 40% (policy H4 of the UDP).
23	Internal	Agree that the 17% target for social rented pitches is an appropriate figure from the GTAA for the DPD. However this is dependent on suitable sites becoming available and this may be unlikely within the early years of the plan. Most affordable housing in the borough is delivered through planning gain or grant funding. Under current affordable policy and thresholds it is unlikely that any Gypsy and Traveller sites would be built and require an affordable housing obligation. The new affordable housing policy in the LDF needs to consider how the Council can negotiate social rented pitches on applications. The Council will and is pursuing grant funding through the Homes and Communities Agency, however this is dependent on suitable sites being identified with discounted land values.
24	Internal	Did the Gypsy and Traveller Accommodation Assessment capture the views of all gypsies and travellers in the area? Are there any views that were not captured that would cast doubt of the 17%? Are there other standards set by other LPAs from which we could take a lead? Would the percentage of social housing be a proxy/used to help determine this percentage?
25	Action Group	This is probably the best estimate available at the moment and the best basis for planning for the future. Any future needs assessment could focus locally on this issue.
26	Residents Association	It would be sensible to make provision to accord with the level of requirement identified in the GTAA.
27	Residents Association	No. Endeavour to seek ALL sites all socially rented Council sites.
28	Individual	No, it is not appropriate. There is no need for such provision based on historical demand. By providing socially rented pitches where there is no need, again this would create a demand and a market and would send out an open invitation for gypsy and travellers to move into the small borough which would subsequently then not be able to meet their needs.
29	Action Group	17% of a figure from 2017 to 2026 which does not appear, is not an adequate method of answering this question. For the period to 2017 only 26 sites appear to be required, of some 5 socially rented sites.
30	Individual	Yes.

16. Are there any other ways of establishing the number of pitches within our overall requirement that should be identified as socially rented pitches?

6	Planning Consultant	None that I am aware of.
11	Parish Council	See previous answer.
13	Parish Council	No.

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17	Action Group	In consultation with the local Gypsy and Traveller community in order to reflect need.
25	Action Group	Direct consultation with local Gypsies and Travellers would seem to be the most appropriate way of establishing needs more accurately. In our view all councils should be reaching out to local Gypsies and Travellers so that their changing needs can be ascertained over time.
26	Residents Association	No.
27	Residents Association	No. Why not adopt the 17% figure if this reflects the number of respondents who have stated to prefer to live on Council owned sites.
30	Individual	No.

17. Do you have any other comments to make about tenure?

6	Planning Consultant	Security of tenure is very important. This has now been addressed under the Mobile Homes legislation.
11	Parish Council	No.
12	Government Department / Organisation	No comment.
13	Parish Council	No.
17	Action Group	See answer to question 14 – a range of tenures is best to meet need. This could also include shared ownership schemes, or self-build schemes where the site is funded by developer contributions.
26	Residents Association	Gypsies and Travellers should be afforded the same security of tenure as those in other communities and the same responsibilities.
27	Residents Association	No. In any consideration you need to have a starting point and if the findings by GTAA shows the percentage quoted why try to disprove it. With Travellers moving about I suggest there is no static numbers to base a percentage on and the position will always be fluid.
29	Action Group	It is clear from the Eaves Green Lane, Meriden appeal that occupiers are interested in having sites owned by Gypsies. The local authority should not become landlords and manage Gypsy sites.
30	Individual	No.

Other Matters:

Travelling Showpeople

18. In view of the fact that there is currently no specific identified need for a Travelling Showpeople site in Solihull, is there a need to provide additional capacity for Travelling Showpeople in the Borough?

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6	Planning Consultant	Unable to comment but absence of sites does not necessarily mean there is no need.
11	Parish Council	We see no need at all.
13	Parish Council	No.
15	Parish Council	No.
17	Action Group	Consultation should take place with the Showmen's Guild and members of the Showmen community.
21	Individual	I do not think that provision should be made for Travelling Showpeople within the Borough.
23	Internal	We have no evidence of need from Travelling Show people.
25	Action Group	We refer you to the Showman's Guild who should be able to answer this question.
26	Residents Association	No - Inappropriate allocation of land, if there is no demand.
27	Residents Association	No. I suggest Travelling Showpeople are on the decrease, in my opinion there are not the number of circuses/fairs seen these days. In any case they tend to only set up where they are performing and at the end of the season go back to base where they stay over the winter months. Hence this perhaps is the reason Council have found no specific need for these persons. Retired/infirm former members of Showpeople groups tend to belong to close knitted family groups who would reside back at base.
28	Individual	No, there is no need based on historical demand.
29	Action Group	No.
30	Individual	No.

Stopping Place and Transit Provision

19. Should provision be made for transit accommodation in Solihull?

6	Planning Consultant	Yes.
11	Parish Council	No, we see no need.
13	Parish Council	No.
15	Parish Council	Only when the need is identified for transit accommodation, should consideration be given to this provision.
17	Action Group	If there is a need for transit accommodation, then this should be planned for appropriately so that people do not need to stop on unauthorised sites. It may be more appropriate to look at transit provision cross-boundary.
21	Individual	I do not think that provision should be made for transit accommodation within the Borough.
24	Internal	This might be necessary, but unless an assessment is undertaken what data/evidence is available to support the need for transit accommodation?

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25	Action Group	Failure to ensure transit accommodation will mean that Solihull would become a no-go area for nomadic Travellers.
26	Residents Association	Yes - Unauthorised encampments create tension and perpetuate conflict between the settled and travelling communities. Whilst incidents may have diminished, if incidents are occurring it demonstrates a need. Strict stopping time limits should apply.
27	Residents Association	No. If no current need for provision has been established then do not encourage Travellers to stay in Solihull. Land is already at a premium for other purposes.
29	Action Group	No.
30	Individual	Yes.
33	Individual	No - transit sites are no good. They will attract Gypsies and Travellers from all over and will be difficult to manage. There is likely to be mess because sites are not owned and a caretaker would be needed for potential conflicts between different families.
35	Individual	No – transit sites will not work as Gypsies and Travellers will use them as a permanent base and it will be difficult to get them off.

20. Should there be a separate site identified for transit pitches?

6	Planning Consultant	Probably not.
11	Parish Council	No, we see no need.
12	Government Department / Organisation	No comment.
13	Parish Council	No.
15	Parish Council	Not if this can be avoided by incorporating it into existing sites if a need for transit pitches arise.
17	Action Group	This is dependent on local circumstances and need. Consultation should take place with local communities and any families who regularly travel through the area.
25	Action Group	There will need to be some sort of transit provision provided.
26	Residents Association	Yes, transit sites should be solely for the purpose of passing through, with permanent sites reserved for identified need in the Borough. No transit site should be located in Green Belt.
27	Residents Association	No. We wish to keep sites to a minimum and if you open the flood gates everyone will come.
28	Individual	No, there is no need based on historical demand.
29	Action Group	No.
30	Individual	Yes.

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21. Should any future residential site provision include space for visitors?

6	Planning Consultant	Yes – this is the preferred choice of most traveller to stop with their own family and friends and not on a site where they may not know who the other families are.
11	Parish Council	No, we see no need, and find it extraordinary that space for visitor pitches should be considered since it would clearly be impossible to monitor such use in order to ensure it was temporary, not permanent.
13	Parish Council	No.
15	Parish Council	Where possible, extra space could be factored into plans for future sites, but local amenities need to be sufficient to support this.
17	Action Group	Yes, providing it is appropriate for that site. If a family is applying for planning permission for a small private site for their family, then clearly providing space for visitors should be a decision for the applicant and not a requirement of the planning permission. There should not be a blanket requirement for all new sites to have space for visitors, though generally making space for visitors is a positive approach.
25	Action Group	This is a sensible approach which would allow for accommodation of visitors to sites.
26	Residents Association	This would seem sensible, but should be included in the planning process with full regard to policy (i.e. space for visitors should be taken into account when considering the site of the site and the number of caravans / pitches).
27	Residents Association	Yes. For currently established sites it would not be unreasonable to provide for visitors.
28	Individual	Visitors can come by care and share existing accommodation, just as visitors to any other residential dwelling would, why would there be a need to over provide where there is no need?
29	Action Group	No. There is no information provided on demand for this provision.
30	Individual	Yes.
32	Individual	No visitor pitches because non-residents would want to stay on a longer term basis and control would be lost over who is eligible to stay on the site.
35	Individual	No need to make provision for specific visitor pitches on sites.

22. Should temporary stopping places be identified?

6	Planning Consultant	Probably not necessary if private sites include an element of transit provision
11	Parish Council	No, we see no need.
13	Parish Council	No.
15	Parish Council	Only if a need for temporary stopping places are identified.
17	Action Group	If there is a need for temporary stopping places, then they should be provided so that people do not

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		need to resort to unauthorised sites. Again, it may be useful to look at this with other local authorities to take a cross-boundary view.
25	Action Group	This would be a first step towards meeting transit needs and their presence would help with the identification of the scale of need for transit provision.
26	Residents Association	Yes - This would resolve many issues for the Travelling Community, enhance highway safety and discourage unauthorised encampments.
27	Residents Association	Yes. On grounds of safety.
28	Individual	No, this is very naive. Historical evidence shows they would not be used as temporary. They could be occupied and developed illegally and years later it would be regularised as a permanent site.
29	Action Group	No.
30	Individual	Yes.

23. Do you have any other suggestions for how transit provision should be made?

6	Planning Consultant	There is land at Damson Lane but it is not generally advisable to add general transit provision next to or as an extension of a private site as you have no control over who is pulling on to the site.
11	Parish Council	No, since we see such provision as unnecessary.
13	Parish Council	No.
17	Action Group	Working with other local authorities could be beneficial in getting a wider view.
26	Residents Association	Potentially previously developed land awaiting development could be used until such time as development commences. This may be seen as an opportunity by land owners and / or developers to benefit. This would by necessity, mean that Transit provision would not be permanently in a given location.
27	Residents Association	No.
28	Individual	For Travellers who are still travelling, limited temporary sites should be sourced which are brownfield and close to Motorway sidings, to facilitate travel. The sites should be council managed to stop illegal expansions outside of planning control.
29	Action Group	Lack of data makes it impossible to provide a comment.
30	Individual	No.

24. Do you have any other comments on stopping place and transit provision?

6	Planning Consultant	No further comment.
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11	Parish Council	No.
13	Parish Council	No.
17	Action Group	As with question 23, working cross-boundary could be helpful.
26	Residents Association	No.
27	Residents Association	Yes. Away from residential areas to avoid disturbance to local residents and traffic problems.
29	Action Group	See Q23.
30	Individual	No.

Family Growth

25. Should new residential sites include an element of provision for future family growth?

6	Planning Consultant	YES though not essential if suitable provision is also made elsewhere.
11	Parish Council	No, we believe that no special provision should be made on assumed growth. The settled community has to make its own provision, so we see no reason to make this a special, or favoured, case.
13	Parish Council	No.
15	Parish Council	Yes, in order to prevent the need for further additional new sites needing to be identified in the near future.
17	Action Group	See answer to question 21. Whilst planning ahead is a good idea, and accommodating future family growth is one aspect of that, there should not be a blanket requirement for all sites to be able to accommodate future growth as this may mean some sites are not considered suitable, and then that growth may never come forward.
23	Internal	We have no other understanding of family growth other than that which is proposed from the GTAA.
24	Internal	This would seem sensible.
25	Action Group	This would be a sensible approach, especially for new family sites who will experience growth in the future/.
26	Residents Association	No - This provision is incorporated into the assessment of future need. Large extended families prevalent in the Travelling community may lead to this provision being taken by family members who already have accommodation, generating unexpected need.
27	Residents Association	Yes.
28	Individual	No, planning permission should be sought for family growth provision and should be assessed in the normal way, just as if I wanted to extend my house in greenbelt land to accommodate ageing parents, married children with dependents etc.

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29	Action Group	The lack of evidence makes this question unanswerable.
30	Individual	Yes.
34	Individual	Yes, family growth on sites needs to be accommodated.
35	Individual	Future family growth should be taken into consideration.
39	Action Group	The Trust believes that the potential for strategic allocations to accommodate future extensions for family growth should be considered within the site assessment criteria. These potential extension areas however need to take full account of potential impacts on biodiversity and so additional ecological data will be needed to inform the conclusions of the Sustainability Appraisal for these sites. The Trust would strongly oppose any site allocation or future extension that would result in the loss or degradation of a statutory or non-statutory wildlife site.

Safeguarding of Sites

26. Should existing sites and potential site allocations be safeguarded for Gypsy and Traveller Accommodation use in perpetuity?

6	Planning Consultant	Yes unless policy requires any redevelopment to ensure suitable alternative provision is provided if a site has to be redeveloped.
11	Parish Council	No. The PC believes that provision should be under annual review, not in perpetuity, and that annual review would include reference to adherence to the Policy considerations (page 10) and that normal planning requirements should apply. The PC also believes that it would be essential for Solihull Council to take immediate and positive action against any breaches of the Policy.
13	Parish Council	Yes.
15	Parish Council	Yes.
17	Action Group	Provided the site is well located, then this may be appropriate. Where it might not be is if the site is not well located, for example I am aware of a site that is next to a waste development on an industrial estate (not in Solihull). As the waste development continues to expand and the industrial nature of the area intensifies, the location is less and less suitable for a residential development and ideally it should be relocated. Should relocation take place then there would be no need to safeguard that site for Gypsy and Traveller Accommodation as it is not appropriate.
23	Internal	All 'bricks and mortar' social rented housing secured through the planning gain is safeguarded in perpetuity through Section 106 agreements and through ensuring that social rented homes are transferred to a Register Provider (housing association). In provision of social rented Gypsy and Traveller pitches, we would insist on the same principles to ensure they are safeguarded. Any pitches built through grants from the Homes and Communities Agency would require similar safeguards.

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24	Internal	Most existing sites with permanent provision have been agreed into perpetuity by their very nature. I would suggest that temporary and potential sites should be assessed on a site by site basis for reasons discussed at question 6.
25	Action Group	Yes this is an appropriate approach when there is a shortfall in site accommodation.
26	Residents Association	Yes. Where sites are identified as appropriate for Gypsy and Traveller sites, they should be safeguarded for that purpose.
27	Residents Association	Yes. This should reduce the possibilities of having to find new sites should an existing site be acquired for redevelopment etc. It is necessary to keep control of this situation and this can be achieved by having a knowledge of known current sites.
28	Individual	No, this is not practical. Many sites on gypsy family owned land and are well established, which is why planning permission was given. Their land should be used / sold in the future whenever and for whatever reason the landowner sees fit, and gains permission for. This should be done in line with whatever current planning regulations are.
29	Action Group	No. They should be subject to the normal rules governing the use of land. What criteria should be considered if a site is "abandoned".
30	Individual	Yes.

Rural Exception Sites

27. Should the DPD include a Rural Exception Site Policy for affordable Gypsy and Traveller sites?

6	Planning Consultant	Only if land is too expensive/ unavailable for Gypsy –Travellers. At present it would appear families have been able to buy/ develop land (ie Damson Lane, Shadowbrook Lane, Eaves Green Lane). But if there is an embargo on any new sites in the Green Belt then yes – as it would be unrealistic to expect families to be able to afford land within settlement boundaries and exception sites will have to be provided.
10	Action Group	No, unless absolutely necessary.
11	Parish Council	No, we can see no reason why normal planning requirements should not apply.
13	Parish Council	Yes.
15	Parish Council	This should be considered across the board where affordable accommodation needs are identified, not only for Gypsy and Traveller sites, but affordable housing for all in need.
17	Action Group	Yes, if this is necessary to meet the level of provision required in the Borough.
24	Internal	It should consider it.

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25	Action Group	Inevitably given the difficulties in finding suitable land for sites rural areas may provide the only potential for affordable sites. Hence a rural exception policy would seem to be a pre-requisite for any successful meeting of needs.
26	Residents Association	No.
27	Residents Association	No. This would appear to create unnecessary problems (legal/physical) especially if such sites were subject to policies of restraint as has been suggested.
28	Individual	No, Solihull is too small and when considered alongside the rest of the LDP, Solihull will have no rural areas come 2026.
29	Action Group	No. It is unclear how "affordable" can be defined.
30	Individual	Yes.

General Comments:

28. Are there any other general comments that you wish to make?

6	Planning Consultant	<p>Concern is expressed over the two tier approach to site allocations. Policy seeks to make permanent all existing unauthorised sites in the Green Belt. This has been done in four cases in advance of adoption of the draft Core Strategy policy and contrary to advice in C 1/2006 that Green Belt sites should be allocated as a last resort and contrary to advice in PPG2. There has been no sustainability appraisal of all other options. It is not even clear what other options were considered before permanent consent was granted for these 4 sites. If the Core Strategy policy is not adopted at the EIP there may be question marks over the lawfulness of the procedure followed by Solihull in granting permanent permission to four sites and whether they can be relied on to meet existing need.</p> <p>It is not clear if the presumption in favour of Green Belt sites will apply to the site search for sites post 2012. If not, and if there is any suggestion sites can be found that are not in the Green Belt this raises serious question about the approach taken to make permanent four sites in the Green Belt pre 2012.</p> <p>Given the continued presumption against use of land in the Green Belt for Traveller sites the Council needs to be clearer on its position in this regard. It is confusing in so far as on the one hand it quotes extracts from the draft PPS, yet makes clear the support to make permanent sites in the Green Belt to 2012, expand these sites post 2012, and make further provision post 2012 which will follow the same criteria as that to 2012 ie which appears to support further provision in the Green Belt. If the Council is to take this approach it is essential a sustainability appraisal makes clear this is a „last resort’ and all other options have been explored.</p>
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		<p>I presume regard must be had to the recent judgement in Save Historic Newmarket v Forest Heath DC which concluded that for there to be compliance with Article 5 of the SEA Directive the public must be presented with an accurate picture of what reasonable alternatives there were to proposed policies and why they were not considered to be the best option. I do not consider it possible to understand on what basis Solihull concluded that existing sites in the Green Belt should be made permanent in advance of the adoption of the Core Strategy policy and what reasons there are for rejecting any alternatives in urban areas as none appear to have been considered. Whilst I do not object to the making permanent sites in the Green Belt as this clearly provides security and permanence for the families who own and occupy those sites, I do think that without transparency of plan making the process will be open to question.</p> <p>One issue not considered is the removal of land from the Green Belt.</p> <p>There is recognition on page 3 that</p> <ul style="list-style-type: none"> A) there is shortage of sites b) this shortage has resulted in unauthorised developments c) lack of suitable accommodation underpins many of the inequalities that travellers experience d) provision of sites is the key to tackling a host of issues (as listed) including the tension with the settled community <p>This recognition that policy failure is the cause of so many problems is welcomed. Too often the travelling community are blamed for unauthorised developments when in fact, as recognised by Solihull, this is due largely to policy failure and absence of any fairness in the way this matter has been addressed by Planners.</p>
8	Government Department / Organisation	<p>Our priorities relate to the canal corridor and land and development within and immediately adjacent to the corridor.</p> <p>The Grand Union Canal, North Stratford Canal and Olton Reservoir within Solihull are an important forms of infrastructure that can potentially be affected by all scales and types of development located adjacent to or in close proximity to these assets.</p> <p>BW would require development within and immediately adjacent to the canal corridor to safeguard the safety and structural integrity of waterway infrastructure and the safety of users and neighbours; protect and safeguard inland waterways for water resourcing purposes, including the need for water</p>

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		management, improving water quality, managing land drainage, and avoiding, reducing and managing flood risk; protect and enhance the heritage, natural environment and landscape character of inland waterways; encourage public access to and recreation use of inland waterways; protect and support the navigation of inland waterways and waterway related tourism; and protect the operational waterway infrastructure.
9	Residents Association	<p>1. There being a duty imposed on this authority that duty must be recognised.</p> <p>2 But not failing to ensure, in advance, that applicable planning laws are recognised by the persons concerned.</p> <p>3 The illegal occupations see are surreptitious, well thought out in advance by those concerned and implemented in the main by mass invasion, relying on intimidation of local residents and landowners. (Harassment).</p> <p>4. Such intimidation is a criminal offence and should be pursued at the earliest possible moment by the Authority to ensure control is achieved of those participating in such behaviour. (Public Order Acts apply).</p> <p>5. There is a common belief of residents and landowners that they are not permitted as an individual to seek injunctions to effect clearance of such invasion. It is my understanding that any individual may seek injunction at minimal cost. That facility should, if existing be made known to all persons likely to be affected by such invasions and support offered to do so.</p> <p>6. The current powers available to the local authority should be implemented immediately and without fail to ensure control of such intended invasions.</p> <p>7. As such persons are expert at abusing a site occupied with the remains of litter, waste material etc. left for clearance at considerable cost by the local authority there should be a requirement imposed immediately such actions are identified for a financial charge to meet clearance of the same.</p> <p>8. Landowners who abuse planning laws to permit such invasions should be actively pursued and, if any change as at 7 above is not met the same should be imposed on the owner of the land or the occupant or both.</p> <p>9. The local authority and all others, including the police, should have an action plan in effect that can be implemented immediately.</p>
10	Action Group	The NFU understand that there is a requirement for Gypsy and Traveller sites within the region and I have read and understood the points raised in the options paper. I welcome the points made in Policy 5 of the Emerging Core Strategy in relation to green belt sites not normally being permitted and that development in the open countryside will only be considered: “where there is a pressing general or personal need and only against the site suitability criteria outlined above”. Green belt sites are of high importance nationally so it is encouraging that such Policies (as Policy 5) are appreciated and adhered

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		<p>to. Perhaps I would like to add to this list in Policy 5 – that sites should not normally be allocated next to or within very close proximity of an intensive poultry or pig unit, due to problems with odours. If sites are to be allocated for Travellers every consideration must be made to ensure that the correct site is chosen initially, so that problems such as those associated with being located close to an intensive pig/poultry unit are not encountered after the infrastructure of the site has been costly implemented and people have settled, who then have to leave as the site was not correctly evaluated. Intensive poultry and pig units may create air emissions that gypsies and travellers do not welcome, therefore we would hasten to add that development on land near to such units should be very carefully considered or even abandoned if necessary. The NFU obviously are concerned about future food shortages, with a growing population and increasing land area, we need to at least double food production by 2050. Therefore it is imperative that agricultural land or land that could potentially be used for agriculture is not allocated as a gypsy/traveller site wherever possible. In circumstances where a Rural Exception Site Policy is considered all land owners and nearby residents should be consulted. We have encountered problems in the past where Travellers establish themselves on ground without landowners permission and without notifying or consulting local residents. This can create a negative image and tensions between residents and the Travellers. Therefore I feel that unless it is absolutely necessary, the Rural Exception Site Policy should not be included in the DPD.</p>
11	Parish Council	<p>The PC is particularly concerned at the unlawful occupation and continued enlargement and settlement of the Shadow brook Lane site. The PC would be alarmed should Solihull consider making this a permanent site in contravention of planning regulations and the Policy considerations set out on page 10 of the Gypsy and Traveller Site Allocations Development Plan Document. (see Q2) and would consider it perverse in the extreme.</p>
13	Parish Council	<p>It is considered that there are adequate sites within the BPC boundary: The Haven, The Warren, The Pleck.</p>
14	Government Department / Organisation	<p>Where sites are identified that could have an impact on the strategic road network, we would envisage being consulted both as part of the further preparation of this document and also eventually through the development management (planning application process).</p>
16	Private Company	<p>It is essential provision is made within the Borough for a temporary stay site. More permanent sites should be found, but not near commercial areas (e.g. the NEC site, Birmingham Airport) Council's / Courts should have quicker processes to remove Gypsies from illegal sites and enforce the making good of any damage caused and site clearance once an order has been obtained for the site to be vacated.</p>

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18	Parish Council	Tidbury Green is not a sustainable development site due to the lack of infrastructure. In addition, there are a number of sites, such as Houndsfield Lane, Poolhead Lane and by St. Patrick's church, already bordering Tidbury Green so it is not felt to be a suitable area for further sites.
20	Government Department / Organisation	<p>Issues considered important when allocating sites:</p> <p>Flood Risk Planning Policy Statement 25: Development and Flood Risk (PPS25), Table D.2, states that caravans, mobile homes and park homes are Highly Vulnerable to the effects of flooding, and as such are inappropriate in Flood Zone 3a or 3b (the highest risk zone, including functional floodplain). As such the DPD should include policies that make it clear that residential sites subject to this level of flooding should not be permitted. Table D.2 also states that such a use is only acceptable in Flood Zone 2 (medium risk zone) in exceptional circumstances, i.e. it has to pass the Sequential Test and the Exception Test as defined in PPS25. The only zone without significant flood risk constraints to this type of development is Flood Zone 1 (the lowest risk zone). We therefore recommend that the Strategic Flood Risk Assessment (SFRA) informs any planning decisions made regarding this type of land use, and this is made clear within the DPD. The PPS25 Sequential Test should be applied at all levels, and as such DPD's such as this should ensure that the allocations of sites should be selected using the sequential approach to flood risk, and that any windfall applications are also sequentially tested in line with PPS25 requirements.</p> <p>Surface water drainage We would expect any proposals for surface water to consider the use of SuDS in the first instance.</p> <p>Foul Drainage We would also expect any site to follow the hierarchy set in Circular 3/99 and connect to mains sewerage provision in the first instance. We consider the above comments should be considered when selecting allocation sites and the drawing up of policies with the DPD.</p>
21	Individual	In general, I believe that every effort should be made to encourage Gypsy and Travelling people to settle within a community, including Solihull, and to participate in that community. This would require, among other things, the provision of adequate places for their children to acquire a good standard of education and training. Hopefully in the course of time, those who wish for it may become eligible for council housing or be able to benefit from affordable housing within the Borough.
22	Parish Council	The Parish Council welcomes the recognition by the Borough Council to make provision for the needs of Gypsies and Travellers identified in the GTAA. However, as the area within the Parish Council's remit has a common boundary with Solihull, we are concerned that the level of provision intended to be

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		<p>made is precisely geared to an assessment which is now over three years old, leaving no flexibility if the assessed level of need turns out to be an underestimate. That eventuality could result in more unauthorised development and encampments being established in inappropriate locations within the adjacent rural Green Belt areas such as ours, not readily accessible to local services and employment by sustainable transport. We request, therefore, that provision for an allowance above the currently assessed need is made to provide an element of flexibility.</p> <p>The way in which provision is made through the DPD is not a matter on which the Parish Council wishes to express a view.</p>
23	Internal	<p>The Council is committed to meeting the needs of Gypsy and Travellers in the borough. The Council is also working to produce a Corporate Gypsy and Traveller Strategy, the draft of which was submitted and approved Cabinet in July 2010 for consultation.</p>
26	Residents Association	<p>No further development of Gypsy and Traveller sites in Green Belt (particularly the sensitive Meriden Gap) should be permitted in any circumstances other than on land owned by the Local Authority (where there is democratic accountability) and which in their view fulfils all the criteria as set out in Policy 5 of the Emerging Core Strategy.</p> <p>All development should be plan led. There should be presumption against permission where there are clear attempts to force residential development through unauthorised - pre-emptive development which are accompanied by retrospective applications. Such strategies undermine community cohesion and are likely to involve the council / taxpayer in costly enforcement action. SMBC should use any new freedoms via localism to refuse applications and seek immediate legal redress.</p> <p>SMBC should adopt Appendix E of 01/06 as a local protocol to advise all Travellers of their responsibilities regarding site selection and prospective development and enforce presumption against such development where this has not been adhered to.</p>
27	Residents Association	<p>Make sure existing sites in the Borough are used to maximum capacity. Difficult for lay person to establish extent of problem when it is not known how many Travellers/Gypsies live in the Borough (not Caravans) or who pass through. More sites Council try to create Solihull may end up with a disproportionate numbers of these groups of people.</p> <p>Protect the Green Belt at all cost.</p>
28	Individual	<p>Solihull council should base its strategy on provision of gypsy and traveller sites in accordance with current national policy, not in advance of it. Clearly as a public body Solihull Council must not discriminate against any minority protected by the Equality Act 2010 in terms of the provision of goods and service and in terms of its public duty. This is not the same as positive discrimination in favour of a minority, and there is no requirement to do so in this respect. If Solihull Council go ahead as proposed in this document, they will be basing their assessment on an overstated need based on an overstated</p>

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		obligation as interpreted by a previous government.
29	Action Group	There is no convincing argument presented to require a policy for 26 sites. Sites should not normally be located within confirmed Green Belt. The only exception should be linked to the 'Section 191 Certificate of Lawfulness' provisions. The Council should make greater use of enforcement in relation to unauthorised sites i.e. sites without planning permission.
31	Individual	Site proposed between Waste Lane and Old Waste Lane, Balsall Common.
32	Individual	Need to make social provision for travellers who are unable to find / afford their own sites. Travellers who are not able to find sites and are forced to live in housing. Pitches need to include a separate building with a kitchen and bathroom area and there needs to be space for a mobile trailer (due to cultural traditions about sleeping arrangements for males and female children after a certain age). There would need to car parking spaces, space for bins and room for children to play as well as drying space for washing and individual post boxes in order that mail is not lost and appointments are missed. Social sites will need a caretaker / warden who residents could go to with problems or maintenance issues. There would need to be a gated entrance that only residents could use to access the site, in order that the site could not be accessed by non-residents. It would be beneficial to have some sort of community room where residents could go and have a chat and maybe a formal play area for children on site. Facilities for the disabled should be provided and a few visitor car parking spaces provided, but not visitor pitches because non-residents would want to stay on a longer term basis and control would be lost over who is eligible to stay on the site. All residents on social sites should have references and be police checked before being allowed on sites. Sites should be well planned and maintained and residents will therefore want to maintain standards. Sites should not be too big.
33	Individual	Transit sites are no good. They will attract Gypsies and Travellers from all over and will be difficult to manage. There is likely to be mess because sites are not owned and a caretaker would be needed for potential conflict between different families. Permanent social sites are needed for those who cannot afford to buy their own land. References and police checks should be required for all residents who want to live there. Problems have arisen on sites at Siskin Drive in Coventry and Castlevalle in Birmingham. Site should not be too big. 6 - 10 pitches max.
34	Individual	No need to provide visitor pitches on sites. Family growth on sites needs to be accommodated.
35	Individual	Transit sites will not work because Gypsies and Travellers will use it as a permanent base and it will be difficult to get them off. Council owned sites should be provided for those who cannot afford their own

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		land. No need to make provision for specific visitor pitches on sites. Future family growth should be taken into consideration.
36	Individual	Social sites do not work. They become dominated by one family which puts other families off and there would be no control over who resides there. Standards would not be maintained because families do not own the site. However, the need for a mix of public and private sites is recognised. The culture of Gypsies is being eroded. Keen to run a private site, if land becomes available.
37	Individual	<p>I appreciate that SMBC has been given this task by central government and I understand that the task is not an easy one. I am sympathetic to the need for sites, both transit and (semi) permanent, for the use of people who for one reason or another do not wish to follow a conventional lifestyle. Such sites should be created and maintained in such a way that little harm is done to the local environment just as permanent commercial and residential developments are controlled taking regard of the quality of life of nearby residents, public access to open spaces etc. Minority groups such as gypsies and travellers cannot be easily defined or identified and should not in any case be given special rights or privileges not enjoyed by the rest of the population. Users of such sites should of course pay a fee set as a fair market rate.</p> <p>In general brownfield land should be used for such sites to avoid the slow nibbling away of greenfield land and the loss of amenity in residential areas. Unfortunately I am unable to identify any suitable sites in my own locality (Dorridge) or in the local surrounding area.</p> <p>If / when sites are identified and implemented it will be important for the Local Authority to ensure that users / residents of such sites:</p> <ul style="list-style-type: none"> - obey the laws of the land - ensure their children receive a good education - maintain the visual amenity of the site and vicinity
38	Residents Association	We do not need any Gypsy sites in the Borough at all.
39	Action Group	The Trust would expect Solihull Metropolitan Borough Council to ensure that development does not cause unacceptable impacts on biodiversity - and wherever possible contribute to the the enhancement of the natural environment. It is essential that the council takes full account of the biodiversity value of any proposed strategic allocation when assessing its relative suitability against the assessment criteria. Both the ODPM Circular 01/2006 and policy 5 of the Emerging Core Strategy support this requirement and so the Council must, in assessing suitable sites, ensure that up-to-date ecological information is available to inform decision making from the outset. In Solihull information regarding statutory and non-statutory wildlife sites can be accessed using the Habitat Biodiversity Audit data for Warwickshire, Coventry and Solihull. This data should be a starting point to assess the likely ecological constraints for strategic site allocations. In addition we believe that protected species data and information from the

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		<p>draft Solihull Green Infrastructure Study should also be considered to identify additional constraints and opportunities to site selection and thus inform the conclusions of the Sustainability Appraisal. Warwickshire Wildlife Trust has a strong presumption against any allocation likely to result in the loss or degradation of a statutory or non-statutory wildlife site. Solihull Council have made a commitment to protect and enhance designated wildlife sites in the Solihull Nature Conservation Strategy and therefore failure to ensure adequate protection of these sites would be contrary to the council's objectives for nature conservation and to their biodiversity duty imposed by the Natural Environment and Rural Communities Act 2006 (NERC). In turn, we believe that any proposed strategic allocation situated on or adjacent to a statutory or non-statutory wildlife site should score unfavourably within the Sustainability Appraisal. Solihull has a number of potential Local Wildlife Sites (pLWS) that are yet to be surveyed to assess their biodiversity value under the Local Wildlife Site (LWS) Criteria Assessment. In assessing strategic site allocations situated on or adjacent to these sites, pLWS's should be given similar weight to that of designated Local Wildlife Sites. However, where such sites are proposed, priority should be given to ensuring that a full LWS Criteria Assessment is undertaken prior to site selection so the full biodiversity value of the site can be determined to inform the conclusions of the Sustainability Appraisal.</p>
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