

**Wyre Forest District Council's Response to the Final Draft Interim Policy Statement**

**West Midlands RSS Policy Statement: Provision of New Accommodation for Gypsies, Travellers and Travelling Show people - West Midlands Regional Planning Body – Draft Final Document.**

The following comments have been developed in response to the Draft Final Policy Statement by District Council Officers in consultation with the Cabinet Member for Planning and Economic Regeneration.

**Principle and weight of the Policy Statement**

It is understood that the regional framework will assist Local Planning Authorities in producing more detailed site provision policies within their Local Development Frameworks. Without such a framework in place, site allocations could be problematic resulting in site provision arising from the basis of appeal decisions. The principle of the policy statement is therefore welcomed as it will help to address potential policy vacuums and will facilitate local determination based on the formal site allocations process.

The District Council notes paragraph 6.3 which clarifies the status of the Regional Interim Policy Statement which will have similar weight to a submitted draft RSS. It is also noted that the Statement will carry weight in DPD examinations and planning inquiries.

**Residential Pitch Allocations for Gypsies and Travellers 2007-17**

The District Council draws the WMRPB's attention to its previous officer comments submitted on the initial draft policy statement and the technical work late in 2009. These comments reiterated the Council's support for WMRSS Phase 3 Option 2 for pitch allocation, which was based on planning criteria. This option identified 35 additional pitches for the District and was felt to be a more realistic option given that the District has already made a significant contribution towards allocating permanent sites in Worcestershire. Extensive planning constraints also exist within the District and these are principally associated with Green Belt and flood risk.

It is noted at Paragraph 9.2 of the Policy Statement that the District's allocation of additional residential pitches from 2007-17 is 42 – the maximum additional requirement. The Council's initial concerns at the requirement to provide this number of additional pitches still remain and furthermore we would question as to whether this is realistic and deliverable within our District given the considerable planning constraints that exist and the significant number of pitches already provided.

**Additional Residential Pitch Allocations for Gypsies and Travellers 2017-22 and 2022-27**

The figures for additional pitch requirements beyond 2017 set out at Table 2, page 14 of the Policy Statement are noted. IE: 15 additional pitches for the period 2017-22 and 17 additional pitches for the period 2022-27. The Council would argue that these additional requirements would appear to be excessive. Furthermore, those authorities who have historically provided a higher number of permanent pitches would again have to do so over the next phased period based on the assumption of anticipated household growth at an annual 3% compound increase. The robustness of this assumption is therefore questioned and would appear to conflict with Paragraph 9.4 (bullet point 4) of the Policy Statement which states that “the primary objective is, where possible, to increase deliverability by reducing the task for districts which have already made significant provision.”

Under this assumption, the Wyre Forest District would be required to accommodate 74 additional pitches during the 2007-27 time period and the Council would question the deliverability of this level of pitches within our area. This must be carefully considered against the Interim Statement’s policy on the identification of sites set out at page 17, which states that locations must be attractive to Gypsies and Travellers and take into account factors such as impacts on significant environmental assets; access to highway networks and key services. Given these policy requirements and considering the District’s significant planning constraints it will prove extremely difficult to accommodate this level of pitch provision within sustainable locations.

**Wyre Forest District Council**  
**18/02/10**