

Herefordshire Local Plan

Travellers Sites Document



Sustainability Appraisal

Scoping Report June 2014

Sustainability Appraisal of the Herefordshire Local Plan - Travellers' Sites Document

Scoping report

June 2014

EXECUTIVE SUMMARY

X1 This document is the Scoping Report for the Sustainability Appraisal (SA) of the Travellers' Sites Development Plan Document (known as the Travellers' Sites Document). The Travellers' Sites Document will allocate land for Travellers accommodation to meet the identified need over the plan period. The Issues and Options Paper for the Travellers' Sites Document will be issued for consultation in the summer of 2014. For the purposes of this document, Travellers are defined as Gypsies, Travellers and Travelling Showpeople.

X2 Sustainability Appraisal is required by section 19 (5) of the Planning and Compulsory Purchase Act 2004 and requires appraisal of the economic, social and environmental sustainability of a plan. The SA will inform the evaluation of alternative sites in the forthcoming Travellers' Sites Document and provides a powerful means of demonstrating to decision makers and the public that the plan sets out the most appropriate sites given all reasonable alternatives. The results of the SA help to identify which sites are the most sustainable overall and will perform a key role in the preparation of the final Travellers' Sites Document. The results are set out and analysed in an SA Report. The SA Report will be consulted on alongside the Travellers' Sites Issues and Options stage of the Document to ensure transparency in the approach adopted.

X3 The SA Report will record the process of site allocation, including the methods to be used and the likely sustainability effects. This SA Scoping Report represents the first stage in the production of the SA Report. The Scoping Report aims to establish the range and level of detail for the SA, and the overall structure and contents of the final SA Report. This SA Scoping Report provides base data which will be used for the SA Report, identifies draft SA objectives, and outlines the draft SA Framework and site checklist tools, which will feature in the site assessment process.

X4 A key component of the production of planning policy documents is consultation with stakeholders. We are therefore seeking your views on this draft SA Scoping Report between 18 June and 23 July 2014. Consultation Questions are set out in Appendix 3 and should be returned by 23 July 2014.

1 Introduction

1.1 Herefordshire Council is producing a Travellers' Sites Document. As guided by national planning policy in the form of the National Planning Policy Framework 2012, local authorities are required to objectively assess the needs for market and affordable housing and plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community¹.

1.2 In order to achieve this, the Council is progressing with the production of a Travellers' Sites Document as part of its Local Plan. The main aim of the document is to address the objectively assessed accommodation needs of the Traveller community for the next 15 years with the allocation of specific sites for the first 5 years and identification of broad locations of search for the next 10 years.

1.3 The principal document in the Local Plan is the Core Strategy which is currently at Pre-Submission Publication stage. The Core Strategy provides the overarching principles of future growth within the county up to 2031. The Travellers' Sites Document will support and build upon Policy H4 (Traveller Sites) of the Core Strategy.

1.4 The purpose of this Scoping Report is to provide the context for, and determine the scope of, the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Travellers' Sites Document and in particular to set out the framework for undertaking the later stages of the SA/SEA. The scoping stage involves reviewing other relevant plans, policies and programmes, considering the current state of the environment in Herefordshire, identifying any key environmental issues or problems which may be affected by the document and setting out the 'SA framework' which comprises specific objectives against which the likely effects of the policies in the emerging document can be assessed.

1.4 In carrying out the above tasks for the SA of the Travellers' Sites Document, the work that was carried out during the scoping stage of the SA for the emerging Local Plan Core Strategy has been drawn upon as appropriate.

Sustainability Appraisal / Strategic Environmental Assessment

1.5 The undertaking of a Strategic Environmental Assessment of the document is required by Directive 2001/42/EC (the Strategic Environmental Assessment Directive) on the effects of certain plans and programmes on the environment. Section 39(2) of the Planning and Compulsory Purchase Act 2004 also requires that Sustainability Appraisal (SA) is carried out on all new or revised documents. The role of the SA within plan preparation is to provide for a comprehensive assessment of the social, economic and environmental impacts of the plan.

1.6 Government guidance advocates that this is carried out in conjunction with one another as the two are very similar in process, with the SA having a broader scope to include social, economic and environmental issues equally whereas Strategic Environmental Assessment

¹ NPPF, DCLG 2012 paragraphs 47-50

focuses on the environment with a view to sustainable development. In line with the other documents that have already been produced we therefore intend to produce a joint SA/SEA, hereafter referred to as the SA of the document.

1.7 The SA of the document will comply with government guidance and be carried out in line with the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (the Strategic Environmental Assessment Regulations, SI 1633). With the process including the following stages:

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope;

Stage B: Developing and refining options;

Stage C: Preparing the environmental report appraising the effects of the Travellers' Sites Document;

Stage D: Consulting on the Draft Plan and the SA Report; and

Stage E: Monitoring implementation of the Travellers' Sites Document.

1.8 The first stage in the SA process (Stage A) is the production of a Scoping Report to identify the main sustainability issues. This was first carried out for the whole of the county in the Scoping Report for the Local Development Framework of 2007 which has been iteratively updated through the production of various stages of the SA for the Local Plan Core Strategy.

1.9 The LDF Scoping Report went through a five stage process of tasks including:

A1 Identifying other relevant policies, plans, programmes and sustainability objectives

A2 Collecting baseline information

A3 Identifying sustainability issues and problems

A4 Developing the SA framework

A5 Consulting on the scope of the SA

This report covers the five tasks of Stage A in the SA process.

Meeting the requirements of the SEA Directive

1.9 This Scoping Report includes some of the required elements of the final 'Environmental Report' (the output required by the SEA Directive). **Table 1.1** below signposts the relevant sections of the Scoping Report that are considered to meet the SEA Directive requirements (the remainder will be met during subsequent stages the Travellers' Sites Document). This table will be included in the full SA Report at each stage of the SA to show how the SEA Directive requirements have been met through the SA process.

Table 1.1: Meeting the Requirements of the SEA Directive

SEA Directive Requirements	Where covered in this SA report
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.</p>	<p>The full SA Report for the Travellers' Sites Document will constitute the 'environmental report' as well, and will be produced at a later stage in the SA process</p>
<p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes</p>	<p>Section 1 and 2</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</p>	<p>Section 3 and 4</p>
<p>c) The environmental characteristics of areas likely to be significantly affected</p>	<p>Sections 3</p>
<p>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.</p>	<p>Section 3</p>
<p>e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation</p>	<p>Section 2</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)</p>	<p>Requirement will be met at a later stage in the SA process</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Requirement will be met at a later stage in the SA process</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Requirement will be met at a later stage in the SA process</p>

SEA Directive Requirements	Where covered in this SA report
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Requirement will be met at a later stage in the SA process
j) a non-technical summary of the information provided under the above headings	Requirement will be met at a later stage in the SA process
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Addressed in this SA Scoping Report and will be addressed in future Environmental Reports
<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) 	Consultation with the relevant statutory environmental bodies is being undertaken in relation to this Scoping Report between June and July 201.
<ul style="list-style-type: none"> • authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 	Public consultations on the first iterations of the documents are currently proposed for summer 2014
<ul style="list-style-type: none"> • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	N/A as no effects beyond the UK
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> ▪ the plan or programme as adopted ▪ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ▪ the measures decided concerning monitoring (Art. 9) 	Requirement will be met at a later stage in the SA process
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	Requirement will be met at a later stage in the SA process

SEA Directive Requirements	Where covered in this SA report
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been/will be met</p>

Habitats Regulations Assessment

1.10 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Travellers' Site Document will be undertaken by the Council or their consultants during the production of the documents and the findings will be taken into account in the SA where relevant.

Structure of the Scoping Report

1.11 This section (**Section 1**) has described the background to the production of the Herefordshire Travellers' Sites Document and the requirement to undertake SA. The remainder of this report is structured into the following sections:

- **Section 2** explains the review of plans, policies and programmes of relevance to the SA of the document.
- **Section 3** references the baseline information which will inform the assessment of the policies and sites in the emerging document.
- **Section 4** identifies the key environmental issues and problems in Herefordshire of relevance to the document and considers the likely evolution of those issues without its implementation.
- **Section 5** presents the SA framework that will be used for the appraisal of the document.
- **Section 6** presents the proposed structure of the SA Report.
- **Section 7** describes the next steps to be undertaken in the SA of the documents.
- **Section 8** describes the Equalities Impact Assessment that is required as part of the preparation of the Travellers' Sites Document.

2 Review of Plans, Policies and Programmes (Task A1)

2.1 In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the wide range of policies, plans and strategies that are of relevance to the Travellers' Sites Document.

2.2 Annex 1 of the SEA Directive requires:

*(a) "an outline of the...relationship with other relevant plans or programmes"; and
(e) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation".*

2.3 It is necessary to identify the relationships between the Travellers' Sites Document and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.

Emerging Herefordshire Local Plan Core Strategy Pre-Submission Stage 2014

2.4 The Travellers' Sites Document is being produced within the context of the Core Strategy (the key Document in the Council's Local Plan (formerly Local Development Framework) which is at an advanced stage of preparation. The Core Strategy sets out the strategic planning policies that the Council will pursue up to 2031. The Core Strategy makes provision for a total of 16,500 new homes and 148ha of employment land throughout the county over the plan period (up to 2031).

2.5 The Travellers' Sites Document will build on and help to deliver Policy H4: Travellers' Sites in the emerging Core Strategy, which sets out the Council's commitment to allocate land to accommodate the accommodation requirements for Travellers. The policy also included a number of criteria relating to planning permissions for Traveller sites, such as the need for sites to be appropriate in scale, be accessible and capable of being adequately screened. The Travellers' Sites Document is likely to include a number of criteria-based policies to build on the provisions of Core Strategy Policy H4.

2.6 In addition to the Core Strategy, there are a wide range of other plans, policies and programmes at the international, national and local levels that are relevant to the Travellers' Sites Document. As part of the scoping stage for the SA of the Core Strategy, a review was undertaken of the other plans, policies and programmes that were relevant to the Core Strategy. This review has been recently revised and updated to reflect recent changes in policy in the Pre-Submission Publication version of the Core Strategy May 2014 and has again been reviewed for the purposes of this scoping exercise for the Travellers' Sites Document. The Equalities Act 2010 has been added to the list of relevant plans, programmes and policies as it specifically refers to Romany Gypsies and Irish Travellers as an ethnic group. The full review of plans, policies programmes undertaken for the SA of the Core Strategy is not repeated here but can be viewed on the Local Plan pages of the Council's website. However, the key documents relevant to the Travellers' Sites Document other than the Core Strategy itself are considered in more detail below.

Plans and policies relating to Travellers

2.7 One key piece of legislation which is relevant to the Travellers' Sites Document is the **2004 Housing Act**, which placed a duty on local authorities to undertake regular assessments of the accommodation needs of Gypsies and Travellers and to include the needs of Gypsies and Travellers in any housing strategy they produce.

2.8 The **Equalities Act 2010** places a duty on the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the course of developing policies and delivering services. Romany gypsies and Irish Travellers are recognised as having a protected characteristic under the Equalities Act 2010.

2.9 In March 2012, the Government published new national policy in the form of the **National Planning Policy Framework** and set out in an accompanying document specific planning policies for Gypsy and Traveller sites: **CLG (2012) Planning Policy for Traveller Sites**. This latter document sets out the Government's approach to planning for Traveller sites and replaced ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites and Circular 04/2007: Planning for Travelling Showpeople. It sets out the Government's aims in respect of Travellers' sites, including:

- To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.
- To encourage local planning authorities to plan for sites over a reasonable timescale.
- That plan-making and decision-taking should protect Green Belt from inappropriate development.
- For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.
- To increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.
- To reduce tensions between settled and traveller communities in plan making and planning decisions.
- To enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.
- For local planning authorities to have due regard to the protection of local amenity and local environment.

2.10 In relation to planning for Traveller sites, national policy states that local planning authorities should, in producing their Local Plans:

- Identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.

- Identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15.
- Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries).
- Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.
- Protect local amenity and environment.

2.11 The Government guidance also states that local planning authorities should ensure that Traveller sites are sustainable economically, socially and environmentally. They should, therefore, ensure that their policies:

- Promote peaceful and integrated co-existence between the site and the local community.
- Promote, in collaboration with commissioners of health services, access to appropriate health services.
- Ensure that children can attend school on a regular basis.
- Provide a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment.
- Provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any Travellers that may locate there or on others as a result of new development.
- Avoid placing undue pressure on local infrastructure and services.
- Do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.
- Reflect the extent to which traditional lifestyles (whereby some Travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.

2.12 The **Gypsy and Traveller Accommodation Assessment (2008 GTAA) for Shropshire, Herefordshire, Telford and Wrekin and Powys** was published in 2008 and presented the findings of research into the accommodation needs of Gypsies and Travellers in the study area. It estimated the number of Gypsies and Travellers living in the area (including on both authorised and unauthorised pitches) and set out the requirement for additional pitches in each local authority. The GTAA 2008 drew on a Herefordshire Council Survey of Gypsies and Travellers which had been carried out in 2006. Over the 5 year period 2008-2012, 83 pitches were estimated to be needed over and above the 8 pitches already planned for the existing Bromyard site.

2.13 In 2012 - 2013 a **Draft Herefordshire Gypsy and Traveller Accommodation Assessment** (Draft GTAA 2013) was prepared which drew upon new survey information (2012) and Census data. This estimated a population of between 550 and 800 Gypsies and Travellers in the county and re-defined the need for new traveller accommodation for 2012-17. However, given the introduction of new national policy on Travellers and the relatively low response rate to the 2012 survey questionnaire, it has been decided to review elements of the draft GTAA to provide for a more robust evidence base. This review will form the basis of the determinant of need for accommodation for Travellers in the forthcoming Travellers' Sites Document.

2.14 The above documents are the key plans, policies and programmes that are of the greatest relevance to the Travellers' Sites Document. It is a snapshot in time and may change as part of the iterative process of sustainability appraisal.

3 Review of Baseline Characteristics (Task A2)

3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them. It will provide the context for assessing the sustainability of sites in the Travellers' Sites Document and monitoring its outcomes.

3.2 Annex 1 of the SEA Directive requires information to be provided on:

- (a) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;*
- (b) the environmental characteristics of areas likely to be significantly affected;*
- (c) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].*

3.3 As with the review of plans, policies and programmes (see **Section 2**), information that was collated in relation to the SA of the Core Strategy has been drawn upon. The baseline information for the SA of the Core Strategy was updated in 2014 and is set out in detail in the Final Report of the SA of the Pre-Submission Publication version of the Local Plan –Core Strategy which can be found on the “Local Plan” pages of the Council’s website. It is not repeated here but has been reviewed to provide an appropriate level of detail in relation to Travellers for the purposes of the appraisal framework set out in **Section 5**, reflecting the subject of the document that this scoping report relates to. Baseline information relating specifically to Travellers follows.

Characteristics of the Traveller Community²

3.4 For the 2011 Census **363** people living in Herefordshire ticked the box to identify as ‘white: Gypsy or Irish Traveller’ - a relatively small minority (0.2%) of Herefordshire’s population, but nevertheless making Herefordshire just outside the highest 10% of authorities in the country in terms of Gypsy & Traveller percentage numbers. It is unlikely

² Taken from the Draft GTAA 2013

that this is a true estimate of the number of Gypsies & Travellers in the county, but it is a count of the number that chose to state their identity.

At present, just this single figure is available. An age breakdown will be given in a future data release

The definition which appeared on the Census form, for respondents to tick, was **Gypsy or Irish Traveller**” i.e. New Travellers were not counted. The reason for this is that Gypsies and Irish Travellers are recognised as an ethnic group in terms of legislation (e.g. planning law) whereas it is considered that New Travellers form a group by virtue of a lifestyle choice.

3.5 The total number of Gypsy and Traveller caravans in Herefordshire, in January 2012, was 161. Although this is up by 13 caravans on the figure from 6 months previously, numbers have fluctuated over the last 2 years, averaging at around 157. The majority (83%) of caravans are on authorised sites and are roughly equally divided between local authority owned and privately owned sites. The proportion of authorised sites is consistent with the country as a whole and Herefordshire’s neighbours. The January 2012 Caravan count recorded 27 caravans as not on authorised sites but tolerated, a figure of 17 %. This is a similar percentage to neighbouring authorities, except Shropshire which has a higher number of authorised sites.

3.6 For the 2012/13 reporting year, the Annual Monitoring Report confirms a total of 5 Gypsy or Traveller pitches were delivered and 6 were delivered the previous year 2011/12. Herefordshire has 6 local authority owned sites which have a combined capacity of 45 pitches. In addition, there are 22 private sites with full planning permission accommodating 56 pitches and 7 private sites, (strictly speaking unauthorised but tolerated long-term and recorded as provision in the Annual Monitoring Report) accommodating 27 pitches.

3.7 Instances of short-term unauthorised encampments occur in the county every year, but there is now no longer any transit site provision in the county. The number of encampments has fluctuated up and down over the period since 2009, and no definable trend can be seen. However, it is interesting to note that the numbers are in-line with the statement in the GTAA 2008 that they would expect something in the order of 27 families per year to need transit provision. Evidence supports the need for a transit site or suitable defined stopping places in the county and this issue will need to be addressed in the Travellers’ Sites Document.

3.8 The number of households in bricks and mortar is difficult to determine as there is no definitive data. A figure of **115** households in Herefordshire is given in the 2008 GTAA. This figure was modelled using all available sources of information at the time.

3.9 A Local Government Information Unit Policy Briefing, published in May 2012 states that “sufficient information is available to conclude that Gypsies and Travellers can expect reduced life expectancy and poor levels of health at all stages of life, exacerbated by social factors. In addition to failings on the part of health providers, individuals experience a number of difficulties in obtaining medical treatment, including obstacles in accessing primary care.”

3.10 A survey of the health needs of Gypsies and Travellers in Herefordshire, carried out by key workers in the Primary Care Trust and the Council in 2008, found that a third of

respondents felt their health was bad or very bad, which is much higher than for the general population. A high proportion (just under half) stated they had a disability, long term illness or health problem which limited the daily activities or work which they could do. (Source: Herefordshire Council Research Team report).

4.0 Key Sustainability Issues (Task A3)

4.1 The key sustainability issues for Herefordshire were previously identified and set out in the 2014 SA report for the Core Strategy. That list of key issues has been revised to reflect the most up-to-date baseline information and the topic of the document which this scoping report relates to. The revised set of key sustainability issues is presented in **Table 4.1** below.

4.2 It is also a requirement of the SEA Directive that consideration is given to the likely evolution of the environment in the plan area) if the emerging document were not to be implemented. This analysis is also presented in **Table 4.1** below, in relation to each of the key sustainability issues.

Table 4.1: Key Sustainability Issues for the Travellers' Sites Document

Key Sustainability Issue	Likely evolution of the issue without the implementation of the document
Population Change	
Age profile increasing	The ageing population trend is likely to continue with or without implementation of the Travellers' Sites Document.
Half population living in rural areas	The issue of access to services and facilities for Gypsies and Travellers specifically would not be as well addressed without implementation of the specific Travellers' Sites Document.
Affordable Housing	
High ratio of property price to household earnings Shortfall of provision of affordable dwellings / increase in number of people accepted as homeless	The issue of both general and affordable pitches for Gypsies and Travellers specifically would not be as well addressed without implementation of the specific Travellers' Sites Document.
Economic activity / employment	
GVA remains lower than regional and national figure per head. Reduce and manage reliance on traditional employment sectors and ensure Herefordshire can attract business in technology and knowledge intensive sectors.	This trend is likely to continue with or without implementation of the Travellers' Sites Document.
Transport and Accessibility	
High reliance on the private car Traffic congestion in Hereford and strain on existing infrastructure	The Travellers' Sites Document is expected to take into account the need to travel when allocating sites and so this issue will be less well addressed without this document.
Climate Change and Flood Risk	
Significant areas of the county are at risk of flooding.	The Travellers' Sites Document is expected to take into account the risk of flooding when allocating sites and so this issue will be less well addressed without this document.
Water Quality	
The River Wye SAC is already experiencing impacts on water quality as a result of changing land use within the catchment, and from	Throughout the development of the emerging Core Strategy there has been significant work undertaken by the Council, the Environment Agency and other stakeholders to ensure that appropriate mitigation is built into the plan to avoid the

Key Sustainability Issue	Likely evolution of the issue without the implementation of the document
point-source discharges, therefore any increase in demand for water treatment in the vicinity of the site could exacerbate this problem.	proposed development having adverse effects on water quality in the River Wye. The Travellers' Sites Document is expected to take this issue into account in the allocation of sites and so this issue will be less well addressed without this document.
Biodiversity and Stewardship	
Habitats and species of national, regional and local importance are under pressure from the adaptation and diversification of farming and forestry employment.	These trends may continue with or without the Travellers' Sites Document.
Waste and Recycling	
Increase in amount of waste production over recent years, with too much still going to landfill.	There is an existing drive to increase levels of recycling and composting within the County and shift in general public opinion towards recycling, should help levels to increase over the coming years, with or without the Travellers' Sites Document. However, the infrastructure to support this change may come under strain, and the Travellers' Sites Document should help to ensure sufficient provision of new waste facilities to a limited extent.
Travellers Accommodation	
Established need for further pitches for Traveller families in the county	Policy H4 in the emerging Core Strategy seeks to provide further residential pitches during the plan period which should work towards accommodating for the needs of the Gypsy and Traveller communities. However, without the adoption of the Travellers' Sites Document, there will be less certainty relating to the delivery of these pitches. Without the adoption of the document, the need is therefore likely to continue.

4.3 The information in **Table 4.1** above shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Herefordshire would be more likely to continue without the implementation of the Travellers' Sites Document, although in many cases they will be addressed to some extent through the implementation of policies in the emerging Core Strategy.

5.0 Sustainability Appraisal Framework (Task A5)

5.1 The SA Framework is designed to set out a series of "sustainability objectives" and associated "appraisal questions" that can be used to "interrogate" options, policies and proposals drafted during the plan-making process. These SA objectives define the long-term aspirations of the county with regard to social, economic and environmental considerations. During the sustainability appraisal, the performances of a plan's policies and options are assessed against these objectives and appraisal questions.

5.2 A set of SA objectives for Herefordshire's Core Strategy was originally presented in the 2007 SA Scoping Report for the Local Development Framework, now Local Plan and were subject to consultation with the statutory consultees at that time. They were then used throughout the SA of the Core Strategy which is now at Pre-Submission stage. The SA objectives were developed from the review of plans, policies and programmes, the collection of the baseline information and the identification of the key sustainability issues at that time.

5.3 Further reviews of plans, policies and programmes, baseline information and key sustainability issues for Herefordshire in the time period of the production of the Core Strategy meant the appraisal framework was reviewed again in the full SA Report for the Pre-Submission Core Strategy (the most up to date versions are included in **Chapter 3** and **Appendix 1** of the Core Strategy Pre-Submission Publication version SA Report, which can be found on the Council's website). For the purposes of the appraisal of the Travellers' Sites document a further review of plans, policies and programmes and baseline information and key sustainability issues, has been considered necessary and amendments have been made to the framework as part of this scoping report. The new, additional key issue regarding the accommodation needs of travellers set out in **Table 4.1** is considered to be adequately encapsulated in objective 11 in the built environment theme of the SA Framework set out in **Table 5.1**. However, it is considered that previously used SA objectives 3 and 7 and associated appraisal questions relating to economic investment and sustainable regeneration in the Education and Transport themes can be scoped out at this stage. The review of plans, policies and programmes has also led to wording changes in appraisal questions 1.4, 11.5 and 14.3 (shown in italics in **Table 5.1**) and the scoping out of questions 4.5, 4.7, and 15.3 (shown as struck through in **Table 5.1**) to better reflect the topic of the document now being prepared.

5.4 The proposed SA framework for the Travellers' Sites Document is presented in **Table 5.1**. It shows the SA objectives along with their associated questions and how all of the SEA topics have been covered by the SA objectives. The SA objectives are grouped into six themes to enable related sustainability issues to be considered together during the appraisal. The six themes are as follows:

- 1 Education and employment.
- 2 Healthy and prosperous communities.
- 3 Transport and access.
- 4 Built environment.
- 5 Resource consumption and climate change.
- 6 Natural environment.

However, as part of the appraisal, all of the relevant SA objectives will be considered against the reasonable options, policies and proposals.

Table 5.1: SA Framework for Travellers' Sites Document

SA Objective	Appraisal Question	SEA Topic covered by objective
Education and Employment		
1. Support, maintain or enhance the	1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors.	Material Assets ³

³ 'Material assets' is listed as one of the topics to be considered in the SEA, but there is no clear definition of what this topic should cover in the SEA Directive or Regulations, and it has been variously defined in different SEA reports as relating to natural resources, e.g. minerals, or built infrastructure, e.g. transport infrastructure. For the purposes of this SEA, the material assets topic is assumed to include resources such as water, minerals and waste, as well as built infrastructure, including transport and waste infrastructure, but also economic and employment infrastructure and interests.

SA Objective	Appraisal Question	SEA Topic covered by objective
provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. 1.3 Encourage fair and decent work conditions and increase median weekly earnings. 1.4 Help to increase diversity, <i>accessibility and/or flexibility</i> of job opportunities <i>throughout the county</i> .	
2. Secure a more adaptable and higher skilled workforce.	2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. 2.2 Reduce inequalities in skills across the county. 2.3 Promote the voluntary sector, lifelong learning and life/environmental skills.	Material Assets, Population
3. Maintain or enhance conditions that enable a sustainable economy and continued investment.	3.1 Improve the resilience and/or diversity of business and the economy. 3.2 Provide or facilitate availability of appropriate sites and properties for new business opportunities or growth whilst using natural resources efficiently. 3.3 Encourage and support a culture of enterprise and innovation, including social enterprise or the voluntary sector. 3.4 Encourage corporate social and environmental responsibility, with county organisations leading by example. 3.5 Promote and support the development of new high value and low impact technologies, especially resource efficient technologies and environmental technology initiatives.	Material Assets
7. Sustainable Regeneration	7.2 Help create an appropriate range of independent, competitive and national retailers. 7.3 Help reduce the number of vacant properties and support vitality.	Material Assets
8. Raise Educational achievements throughout the county	8.1 Ensure that education infrastructure meets projected future demand and need.	Material Assets, Population
Healthy and Prosperous Communities		
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.	5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. 5.2 Help to reduce inequalities in health. 5.3 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation.	Population, Human Health
7. Sustainable regeneration	7.4 Support or create high quality public realm and community/amenity space that is safe and encourages positive community interaction.	Material Assets, Population
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the	9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. 9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through	Population

SA Objective	Appraisal Question	SEA Topic covered by objective
county.	design measures. 9.3 Encourage respect for people and the environment.	
10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	10.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age. 10.2 Enable the involvement of all affected parties, including hard to reach groups. 10.3 Promote equality, fairness and respect for people and the environment. 10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages.	Population, Human Health
Transport and Access		
4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	4.1 Reduce the need to travel. 4.2 Promote more sustainable transport patterns in areas suffering from congestion, 4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 4.4 Increase the use of public transport, cycling and walking. 4.5 Secure the implementation of green travel plans. 4.6 Minimise risks associated with car travel. 4.7 Promote a shift of freight from road to rail.	Material assets
6. Improve equality of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.	6.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport. 6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration.	Material assets, Population
7. Sustainable regeneration	7.1 Support viability or develop services and facilities appropriate to the community, function, character and scale of the centre and existing facilities using sustainable, resource efficient designs.	Material assets, Population
The Built Environment		
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clean, safe and pleasant local environments.	11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction (<i>incl. ancillary buildings</i>). 11.6 Improve the wider built environment and sense of	Population, Material assets

SA Objective	Appraisal Question	SEA Topic covered by objective
	place.	
19. Ensure integrated, efficient and balanced land use.	<p>19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel.</p> <p>19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design.</p> <p>19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials.</p>	Soil
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	<p>20.1 Preserve, protect and enhance Conservation Areas, Listed Buildings, archaeological remains, and other features and areas of historical heritage and cultural value e.g. locally listed buildings.</p> <p>20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area.</p> <p>20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place</p> <p>20.4 Encourage cleanliness and/or improve the general appearance of the area.</p>	Cultural Heritage
Resource Consumption and Climate Change		
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	<p>12.1 Minimise the use of non re-usable materials.</p> <p>12.2 Minimise waste from households, businesses etc. including hazardous waste.</p> <p>12.3 Promote re-use, recovery and recycling of waste.</p> <p>12.4 Deal with waste locally and/or through the best Practical Environmental Option.</p>	Material assets
14. Use natural resources and energy more efficiently.	<p>14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels.</p> <p>14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials.</p> <p>14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build (<i>incl. for ancillary buildings</i>).</p>	Material assets
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	<p>16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources.</p> <p>16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation.</p>	Climatic Factors
18. Minimise local	18.5 Encourage the use of clean technologies and water	Material

SA Objective	Appraisal Question	SEA Topic covered by objective
and global pollution and protect or enhance environmental resources.	minimisation techniques.	assets, Water
The Natural Environment		
13. Value, maintain, restore and expand county biodiversity.	13.1 Protect or enhance habitats of international, national, regional or local importance. 13.2 Protect international, national, regional or locally important terrestrial or aquatic species. 13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value. 13.5 Create new appropriate habitats.	Biodiversity, Fauna, Flora
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings. 15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 15.3 Ensure that environmental impacts caused by mineral operations and the transport of minerals are minimised. 15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users.	Population, Biodiversity, Fauna, Flora
17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	17.1 Reduce flood risk both presently and taking into account climate change. 17.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 17.3 Include sustainable urban drainage systems where appropriate.	Water
18. Minimise local and global pollution and protect or enhance environmental resources.	18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution. 18.2 Protect and enhance the quality of watercourses. 18.3 Provide opportunities to improve soil quality or reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking.	Water, Air, Soil

5.5 The above framework will be used to determine the most sustainable approach or approaches to the site allocation process in the first stage of the Travellers' Sites Document – the Issues and Options Paper, which it is intended to consult upon later in the summer 2014. Once a broad option for the process of allocating sites has been established, it will be used to screen out any unreasonable sites. The above framework will then be used to appraise all reasonable sites. The appraisal process will allow for consideration of short, medium and long term effects, possible mitigation measures and cumulative impacts. It may

not be necessary to answer the appraisal questions in every instance. The questions are intended to focus discussion and assessment. Certain objectives may result in conflicts e.g. maintain quality of the landscape versus new traveller sites. The presence of these contradictions doesn't undermine the SA process as long as potential conflicts are acknowledged and recognised as part of the decision-making process. In the appraisal process each option, policy or proposal of the Travellers' Sites Document will have its anticipated "effect" scored with comments and recommendations provided.

6 Proposed Structure of the SA Reports

6.1 A Sustainability Appraisal Report for each consultation stage of the Travellers' Sites Document will be produced as a key output of the appraisal process. The SA Reports will contain information on the effects of the proposed plan options, policies or site allocations (depending on the stage) and will be published for formal public consultation. They will include the updated table 'signposting' where each of the requirements of the SEA Directive has been met (as shown in **Table 1.1** of this Scoping Report).

6.2 The Final SA report will be written in a user-friendly way in order to ensure that they will be understood by as wide an audience as possible. It will include a non-technical summary and is likely to be structured as set out in Appendix 1.

6.3 Sustainability appraisal matrices presenting the detailed assessment of each option, policy or site allocation against each of the SA objectives will be presented as appendices to the main SA report, along with information about how any consultation responses received in response to earlier stages of the SA have been addressed.

6.4 Once the appraisal work is undertaken, it may be necessary to make refinements to the proposed report structure described above, in order to present the findings of the SA in the most easily understandable way. However, the content of the reports will be fully compliant with the reporting requirements of the SEA Directive and Regulations.

7 Consultation and Next Steps (Task A5)

7.1 In order to meet the requirements of the SEA Directive, the views of the three statutory consultees (Natural England, English Heritage and the Environment Agency) are being sought in relation to the scope and level of detail to be included in the SA report.

7.2 This SA Scoping Report is being published for consultation with the three statutory bodies for a five week period from 18 June to 23 July 2014. Other consultees as per the list in Appendix 2 have also been invited to make comments. In particular, the consultees are requested to consider the questions set out in Appendix 3 to this document.

7.3 As the documents are drafted, they will be subject to the later stages of the SA using the SA framework presented in **Section 5**. Full SA reports (incorporating the later stages of the SA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging documents.

8 Equalities Impact Assessment

8.1 In accordance with section 149 of the Equality Act 2010, Herefordshire Council has an Equality Duty, which means the council is required to have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good community relations. In practice this means the council must remove or minimise any disadvantages suffered by affected groups, meet their needs and encourage them to participate within the community. Romany Gypsies and Irish Travellers are recognised as having a protected characteristic under the Equality Act 2010. The Council is also under a duty through the Human Rights Act 1998 to 'facilitate the gypsy way of life' in relation to ethnic gypsies. It is considered that the Travellers' Sites Document will have a positive effect on Travellers. Herefordshire Council will have due regard to the needs of Travellers in allocating sites and through its policies.

8.2 The Council takes its responsibilities seriously and also recognises that Romany Gypsies and Irish Travellers are ethnic minorities that experience poor social outcomes and discrimination. It, therefore, wants to allocate appropriate sites, with suitable access to services, to promote equality and reduce discrimination. It is considered that, in allocating sites for Travellers, there is a likely impact on relationships between the travelling and settled communities, that there will be direct implications for the life chances of the travelling community, and some likelihood of media interest. Therefore, in accordance with Council's screening process, it has been decided to carry out a full Equality Impact Assessment.

8.3 At this stage, the Council does not believe that in allocating appropriate sites, there will be any adverse impacts on any group with protected characteristics under the Equality Act 2010. On the contrary, it believes that providing sites for accommodation will have a positive impact on Travellers. However, it is important to address community relations between traveller and settled communities to ensure the final outcome will promote equality and social cohesion. Therefore, Equalities Impact Assessment questions will be posed as part of the consultation on the Travellers' Sites Document – Issues and Options Paper regarding issues of equality specifically, before any decisions about the size, location and distribution of any new sites are proposed.

Appendix 1 – Proposed Structure of SA Report

Summary and Outcomes

- A Non-technical summary.
- A statement of the likely significant effects of the plan.
- Statement on the difference the process has made.
- How to comment on the SA Report.

Background

- Purpose of the SA and the SA Report.
- Document objectives and an outline of its contents.
- Compliance checklist with the SEA Directive.

Appraisal Methodology

- Approach to the SA.
- When the SA was carried out.
- Who carried out the SA.
- Who was consulted, when and how.
- Difficulties encountered in compiling information or carrying out the assessment.

Sustainability Objectives, Baseline and Context

- Links to other strategies, plans and policies and sustainability objectives and how these have been taken into account.
- Description of the social, environmental and economic baseline characteristics and the predicted future baseline.
- Difficulties in data collection and its limitations
- Main social, environmental and economic issues and problems identified and the likely evolution of those issues without implementation of the document.
- The SA Framework, including objectives, targets and indicators.

Document Issues and Options and Preferred Options

- Main options considered and how they were identified.
- Comparison of their social, environmental and economic effects.
- How social, environmental and economic were considered in choosing the Preferred Option.
- Other options considered and why these were rejected.
- Any proposed mitigation measures.
- Significant social, environmental and economic effects of the policies.
- How social, environmental and economic problems were considered in developing the policies and proposals.

- Proposed mitigation measures.
- Uncertainties and risks.

Implementation

- Links to other tiers of plans and guidance and the project level (e.g. design guidance).
- Proposals for monitoring

Appendix 2 - Consultees

Consultation on the draft Scoping Report includes:

Informing and sending the document by post and / or email to the statutory consultees listed below and wider stakeholder involvement through informing and placing on Herefordshire Council's web site.

Statutory Consultees

Environment Agency

Natural England

English Heritage

Other External Consultees

The Gypsy Council

Travellers Support Group

Two Rivers Housing

West Mercia Housing Group

Worcestershire County Council

Friends, Families and Travellers

Festival Housing Group

Sanctuary Housing Group

West Mercia Police

Herefordshire Nature Trust

Brecon Beacons National Park Authority

Bromford Housing Group

WM Housing Group

Shropshire Housing Group

The Marches LEP

Herefordshire Clinical Commissioning Group

Campaign to Protect Rural England

NHS England
2gether NHS Foundation Trust Headquarters
Local Nature Partnership (Herefordshire)
The National Federation of Gypsy Liaison Groups
The Traveller Law Reform Project
Dwr Cymru Welsh Water
Elgar Housing Association/Festival Housing Group
Forest of Dean District Council
Wye Valley AONB Office
Gloucestershire County Council
Gloucestershire Housing Association
Hereford Access for All
Herefordshire Association of Local Councils
Wye Valley NHS Trust
Herefordshire Housing
Herefordshire Wildlife Trust
Housing Ambition Group
Wyedean Housing Association
Malvern Hills AONB Joint Advisory Committee
Malvern Hills District Council
Marches Housing Association Ltd
Monmouthshire County Council
Powys County Council
Shropshire County Council
South Shropshire Housing Association

Appendix 3 - Travellers' Sites Document Sustainability Appraisal

Scoping Report Questions

Relevant Plans and Programmes – Section 2:

- 1) Are there other Documents specifically relevant to the Travellers' Sites Document that we should take into account?

- 2) Have we adequately taken into account those listed?

Baseline Profile and Key Sustainability Issues – Sections 3 and 4:

- 3) Can you suggest (or provide) any other information?

- 4) Have we identified the main sustainability issues?

5) Do you agree with those we have identified?

6) Do these require further tailoring / expansion for the Travellers' Sites Document?
What additional appraisal questions do you think are relevant to this Document?

7) Do you think the appraisal methodology (e.g. screening out 'unreasonable' sites) and assessment method is clear and workable?

Name

Organisation

Address

E-mail address

LDF Number