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Non-Technical Summary - Sustainability Appraisal of the Herefordshire Travellers' Sites DPD

Pre-Submission Publication

Prepared by LUC
November 2017

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Project Title: Non-Technical Summary - Sustainability Appraisal of the Herefordshire Travellers' Sites Development Plan Document Pre-Submission Publication

Client: Herefordshire Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
V0.1	30/10/17	First draft	Melissa Mc Ginley	Nick James	Nick James
V1.0	31/10/17	Final report	Melissa Mc Ginley	Nick James	Nick James

NTS of the SA of the Herefordshire Travellers' Sites DPD Pre-Submission Publication

Project Code: 4939

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Non-Technical Summary

Introduction

This Non-Technical Summary relates to the Sustainability Appraisal (SA) Report that has been prepared by LUC on behalf of Herefordshire Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Herefordshire Travellers' Sites Development Plan Document (DPD). It describes how the SA process was used to assist in the preparation of the Herefordshire Travellers' Sites DPD Draft Pre-Submission Publication (September 2017), as required by planning legislation and Government guidance. It includes a summary of all of the information required by the Strategic Environmental Assessment (SEA) Directive¹, transposed into law in the UK by the SEA Regulations² (Statutory Instrument 2004, No 1633) (see **Table 1**). Once adopted the Herefordshire Travellers' Sites DPD will form part of the Herefordshire Local Plan 2011-2031.

Herefordshire Travellers' Sites DPD

Herefordshire Council adopted the [Herefordshire Local Plan Core Strategy 2011-2031](#) in October 2015. The Core Strategy includes Policy H4: Traveller Sites which sets out the criteria against which planning applications for sites for Gypsies, Travellers and Travelling Showpeople will be assessed. The policy states that a Travellers' Sites Document will be prepared to provide sites/plots for the needs of Travellers and Travelling Showpeople for the next five years and to identify broad locations for further development beyond that period. The statutory Development Plan for Herefordshire comprises the Core Strategy, the Herefordshire Travellers' Sites DPD, the Hereford Area Plan DPD, the Minerals and Waste Local Plan, the Rural Area Site Allocations DPD, and Neighbourhood Development Plans prepared by Town or Parish Councils³. The Herefordshire Travellers' Sites DPD is an integral document in the statutory Development Plan for Herefordshire and builds on the Core Strategy strategic policies. It provides more detailed policy advice on allocating sites/plots for Gypsies, Travellers and Travelling Showpeople. All policies in the Herefordshire Travellers' Sites DPD and the other documents that comprise the Development Plan are interdependent and should be read alongside each other. Of particular relevance to the Herefordshire Travellers' Sites DPD are the Core Strategy policies relating to Social Progress [policies H1-MT1], Economic Prosperity [E1 – E6], and Environmental Quality [LD1-SD4], which may provide mitigation for any negative effects identified during the sustainability appraisal.

Work on the Herefordshire Travellers' Sites Development Planning Document (DPD) commenced in 2014 with the production of an Issues and Options Paper. The [Herefordshire Travellers' Sites DPD Issues and Options Paper](#) considered a number of options for how sites and broad locations of search could be identified to meet existing and any future need. In July 2016 the Council published the [Herefordshire Travellers' Sites DPD Preferred Options](#) for consultation which presented an assessment of need for Travellers' sites within Herefordshire and identified eight preferred sites for allocation which included six sites capable of accommodating 21 residential pitches and two temporary stopping places (transit pitches). Following consideration of the comments received during the consultation period and findings from the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the Preferred Options, the Council prepared the Herefordshire Travellers' Sites DPD Pre-Submission Publication (September 2017). It identifies nine residential pitches at four different sites⁴ and one temporary stopping place for five pitches⁵.

¹ SEA Directive 2001/42/EC

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

³ In addition, a separate Bromyard DPD may be prepared, however it is also possible that the parish of Bromyard and Winslow may be covered within the Rural Area Site Allocations DPD.

⁴ One pitch at Romany Close, Grafton; Two pitches at Extension to Orchard Caravan Park, Lower Bullingham; Two pitches at Openfields Caravan Site, Bromyard; Four pitches at Pembridge Caravan Site.

Sustainability Appraisal and Strategic Environmental Assessment

Introduction

The purpose of Sustainability Appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans.

Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the DPD preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the policies and site allocations within the DPD from the outset of its development.

Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), transposed into law in the UK by the SEA Regulations⁶ (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)⁷. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the [National Planning Practice Guidance](#)), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process. The SA/SEA of the Herefordshire Travellers' Sites DPD was prepared in line with this integrated approach and throughout the SA Report and this Non-Technical Summary the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'.

Table 1 below signposts how the requirements of the SEA Regulations have been met within the SA Report.

Table 1 Meeting the Requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in the SA Report?
Environmental Report	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of: (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2).	Chapters 4, 5, 6 and 7, and Appendices 2, 4, 5 and 6.
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapters 1 and 3.
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3.
3) The environmental characteristics of areas likely to be significantly affected.	Chapter 3.
4) 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	Chapter 3.

⁵ Temporary stopping place at Land to the west of A49 Leominster for five pitches.

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

⁷ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

SEA Regulations' Requirements	Covered in the SA Report?
designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	
5) The environmental protection, objectives, established at international, Community or Member State 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.	Chapter 3.
6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	Chapters 4, 5, 6 and 7, and Appendices 2, 4, 5 and 6.
7) 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.	Chapters 4, 5, 6 and 7, and Appendices 2, 4, 5 and 6.
8) 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.	Chapters 2, 4, 5, 6 and 7.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 8.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	This separate non-technical summary has been prepared to accompany the SA Report.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: (a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; (c) the stage of the plan or programme in the decision-making process; and (d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))	Addressed throughout the SA Report.
Consultation	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))	<p>Consultation on the Issues and Options Paper was undertaken between August and October 2014.</p> <p>Consultation on the Preferred Options was undertaken between July and September 2016.</p> <p>Consultation on this NTS and the SA Report will be undertaken from</p>

SEA Regulations' Requirements	Covered in the SA Report?
	06 th November 2017 to 18 th December 2017.
<p>Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.</p> <p>As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall:</p> <p>(a) send a copy of those documents to each consultation body;</p> <p>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</p> <p>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	Public consultation will take place on the Herefordshire Travellers' Sites DPD Pre-Submission Publication from 06 th November 2017 to 18 th December 2017.
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <p>(a) notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</p> <p>(Regulation 14 (1))</p>	Not relevant as there will be no effects beyond the UK from the DPD.
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</p> <p>(Regulation 16(1))</p>	To be addressed after the DPD is adopted.
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>(a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,</p> <p>that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into</p>	To be addressed after the DPD is adopted.

SEA Regulations' Requirements	Covered in the SA Report?
account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.	
Monitoring	
The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. (Regulation 17(1))	To be addressed after the DPD is adopted.

The approach that has been taken to the SA of the Herefordshire Travellers' Sites DPD is described below.

SA Stage A: Scoping

The SA process commenced with Herefordshire Council producing and consulting on a [SA Scoping Report](#) in June 2014. This drew from the earlier scoping work that was carried out in relation to the Herefordshire Local Plan Core Strategy 2011-2031. The scoping stage of the SA involves compiling and understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The SA Scoping Report involved the following tasks and outputs:

- Policies, plans and programmes of relevance to the Herefordshire Travellers' Sites DPD were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information of relevance to the Herefordshire Travellers' Sites DPD was compiled, to provide the basis for predicting and monitoring the likely effects of the plan and to help identify alternative ways of dealing with any adverse effects identified.
- Drawing on the policy review and baseline information, key sustainability issues were highlighted (including environmental problems, as required by the SEA Regulations). Consideration was also given to the likely evolution of each issue if the Herefordshire Travellers' Sites DPD was not to be implemented.
- A Sustainability Appraisal framework was then developed, setting out the SA objectives against which options, and subsequently policies and sites in the DPD, would be appraised. The SA framework provides a way in which the impacts of implementing the DPD can be described, analysed and compared. The SA framework is designed to set out a series of sustainability objectives and associated questions that can be used to "interrogate" draft policy and sites options 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 SA, the performance of the plan policies and site options are assessed against these SA headline objectives and sub-objectives. The SA framework for the Herefordshire Travellers' Sites DPD is based on the framework that was developed for the SA of the Herefordshire Local Plan Core Strategy, although a small number of the objectives and sub-objectives in that framework have been 'scoped out' as they are not relevant to the DPD (e.g. a sub-objective relating to minimising the environmental impacts of minerals operations).

Table 2 outlines the 19 SA headline objectives in the SA framework along with their associated sub-objectives, and demonstrates how all of the SEA topics have been covered by the SA objectives. Note that 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; and, (6) Natural environment.

Table 2 shows the SA objectives considered within each theme. Note that the sub-objectives for SA headline objectives 7 and 18 are divided into more than one theme, according to the issues that they address⁸. The strikethrough text shows the objectives and sub-questions that have been scoped out of this appraisal, as described in detail in the Scoping Report.

Table 2 SA framework for the Herefordshire Travellers' Sites DPD

SA Objective	Appraisal Question	SEA Topic covered by objective
Education and Employment		
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors. 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 of job opportunities.	Material assets ⁹
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	5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport.	Population, human health

⁸ In the detailed SA matrices, SA objectives 7 and 18 have been given a single SA score, taking into account all of the sub-questions. This is for clarity and to ensure that there is no confusion regarding the likely effects on the SA objectives that are identified in the report, although it is recognised that the SA objectives are relevant to more than one 'theme'.

⁹ '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
geographically and demographically and encourage healthy living for all.	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.	
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 county.	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 design measures. 9.3 Encourage respect for people and the environment.	Population
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 clear, 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	Population, material assets

SA Objective	Appraisal Question	SEA Topic covered by objective
	<p>reduce fuel poverty and ill-health.</p> <p>11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction.</p> <p>11.6 Improve the wider built environment and sense of place.</p>	
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 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, 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.</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 and global pollution and protect or enhance environmental resources.	18.5 Encourage the use of clean technologies and water minimisation techniques.	Material assets, water

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

SA Stage B: Developing and Refining Options and Assessing Effects

Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. It should be noted that any alternatives considered to the plan need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan.

Issues and Options stage

Work on the Herefordshire Travellers' Sites Development Planning Document (DPD) commenced in 2014 with the production of an Issues and Options Paper. The [Herefordshire Travellers' Sites DPD Issues and Options Paper](#) introduced broad policy options in relation to the following themes:

- Permanent residential pitches.
- Transit pitches.
- Size of sites and tenure.

The options for each theme were subject to SA and the findings presented in the August 2014 [SA Report](#) to inform the development of the next iteration of the Plan. The SA findings for the broad policy options are repeated in **Chapter 4** of the SA Report, with the detailed appraisal matrices for the options in **Appendix 2**. The Council's decisions on how these policy options have been taken forward into the Preferred Options version of the Plan are also summarised in **Chapter 4** of the SA Report. The Issues and Options document also raised a number of other consultation questions, which did not constitute options for the plan and were therefore not subject to SA, although the responses received from consultees in relation to the consultation questions also helped to inform decision making regarding the next stage of the Herefordshire Travellers' Sites DPD. Consultation responses received specifically in relation to the August 2014 SA Report that accompanied the Issues and Options document have been summarised in **Appendix 1** of the SA Report, and addressed as appropriate in the SA Report of the Preferred Options (this is explained in Appendix 1 of the SA Report).

Preferred Options stage

From December 2015 to February 2016, Herefordshire Council undertook a Call for Sites exercise. A set of 15 reasonable alternative Traveller site options were identified by Herefordshire Council and subject to SA by LUC on behalf of the Council (the findings are set out in **Chapter 5** of the SA Report with the detailed appraisal matrices for the options presented in **Appendix 4**).

Eight of the site options were then identified as being Preferred Options in the [Herefordshire Travellers' Sites Document Preferred Options Consultation Document](#). The SA findings for the eight preferred site options are set out in **Chapter 6** of the SA Report with the detailed SA matrices presented in **Appendix 4** of the SA Report.

The Preferred Options document also includes two further broad policy approaches, the first relates to the longer term supply of sites (from 2019 to 2031), and the second relates to a general design policy, which would apply to all allocated sites and any other sites that come forward for planning permissions that are not identified in the DPD. The findings of the SA of the policy options are also set out in **Chapter 6** of the SA Report.

Pre-Submission Publication stage

Following consideration of the comments received during the consultation period on the Herefordshire Travellers' Sites DPD Preferred Options and the findings from the SA and HRA of the Preferred Options, the Council proposes the allocation of nine residential pitches at four different sites and one temporary stopping place for five pitches. The SA findings for the proposed allocations and policies in the Pre-Submission Publication DPD are set out in **Chapter 7** of the SA Report with the detailed SA matrices presented in **Appendix 5** and **Appendix 6** of the SA Report.

Table 3 details the reasonable alternative site options, preferred options, and proposed allocations for inclusion in the Pre-Submission Publication DPD along with the Council's reasons for selecting or discounting site options.

Table 3 Traveller Site Options identified by Herefordshire Council

Site Number	Site Name	Considered in the Preferred Options DPD	Considered in the Pre-Submission Publication DPD	Herefordshire Council's reason for selecting or discounting
Selected Sites				
Site 1 (previously Site 2 in the Preferred Options and code GTAA/16/HC/O/4 as a reasonable alternative)	Site adjacent to the A49 Roundabout, Leominster	Y – Temporary Stopping Place (up to 14 days)	Y – Temporary Stopping Place for five pitches	Although this site has issues that require further investigation in terms of highway safety and flood risk, it is considered to offer some potential as a temporary stopping site particularly given its location on the A49.
Site 2 (previously Site 8 in the Preferred Options and code GTAA/16/03 as a reasonable alternative)	Romany Close, Grafton	Y – Residential Pitches	Y – Residential Pitches – one additional pitch	This option is considered to offer an efficient use of land by increasing the number of pitches within an already developed traveller site. The site proposed in the Preferred Options replaced a play area, however, following consultation at Preferred Options stage the site area has been reduced to only develop the former warden's office and to retain the play area.
Site 3 (previously Site 4 in the Preferred Options and code GTAA/16/HC/O/2 as a reasonable alternative)	Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham	Y – Residential Pitches	Y – Residential Pitches – two additional pitches	Although this site is located within the Rotherwas Enterprise Zone/Local Development Order area, it is considered that there is an opportunity to make a small scale extension to the existing popular traveller site without compromising the Enterprise Zone objectives or having a significant impact on the remaining employment land.
Site 4 (previously Site 7 in the Preferred Options and code GTAA/16/HC/O/1 2 as a reasonable alternative)	Additional pitches at Openfields Caravan Site, Bromyard	Y – Residential Pitches	Y – Residential Pitches – two additional pitches	This option is considered to offer an efficient use of land by increasing the number of pitches within an already developed traveller site. The redevelopment of the two pitches will offer an opportunity to enhance the site by reducing an area of waste ground from the site.
Site 5 (previously Site 6 in the Preferred Options and code GTAA/16/HC/O/1 1 as a reasonable alternative)	Extension to Pembridge Caravan Site, Herefordshire	Y – Residential Pitches	Y – Residential Pitches – four additional pitches	This option provides an opportunity to extend an existing site in an area which is relatively constraint free and will require limited mitigation. The site has been relocated following consultation comments received at Preferred Options stage and because of flooding issues highlighted in the SA of the Preferred Options. It is now proposed to extend the

Site Number	Site Name	Considered in the Preferred Options DPD	Considered in the Pre-Submission Publication DPD	Herefordshire Council's reason for selecting or discounting
				existing caravan site east rather than south as was proposed in the Preferred Options.
Discounted Sites				
Site 5 in the Preferred Options GTAA/16/HC/O/7	Land to the south east of Sutton St Nicholas	Y – Residential Pitches		This site was not considered in the Pre-Submission Publication DPD as the GTAA Update 2017 identified that the requirement for new pitches was lower than that indicated in the GTAA 2015. The site was also discounted as it is a greenfield site with no existing services/ infrastructure which would be more difficult and expensive to deliver compared to extending an existing Traveller site.
Site 1 in the Preferred Options GTAA/16/HC/O/9	Land adjacent to Morrison's/ Broad meadow Yard, Ross-on-Wye	Y – Temporary Stopping Place		This site was not considered in the Pre-Submission Publication DPD as the GTAA Update 2017 identified that the requirement for new pitches was lower than that indicated in the GTAA 2015. The Council decided that the allocation of the Temporary Stopping Place at Leominster would satisfy the requirements for this type of Traveller site. Furthermore, there were concerns from local businesses regarding the impact on access if the site was developed.
Site 3 in the Preferred Options GTAA/16/01	Land adjacent to Whitfield Coppice, Trumpet	Y – Residential Pitches		This site was not considered in the Pre-Submission Publication DPD as the GTAA Update 2017 identified that the requirement for new pitches was lower than that indicated in the GTAA 2015. Furthermore, the issues regarding highway safety had not been resolved and therefore the Council decided not to take the site forward for development.
GTAA/16/HC/O/1	Pontrilas Highways Depot	N		Discounted because of highway safety issues and consideration of quality of employment land, which is classed as moderate. The Employment Land Study 2012 states the site has reasonable quality buildings with two accesses to the

Site Number	Site Name	Considered in the Preferred Options DPD	Considered in the Pre-Submission Publication DPD	Herefordshire Council's reason for selecting or discounting
				site.
GTAA/16/HC/O/3	Land at Waterworks Lane, Leominster	N		Access would be unsuitable for use as temporary stopping place. Flood zone unsuitable for permanent residential pitches.
GTAA/16/HC/O/5	Land adjacent to A49 Roundabout – Site B, Leominster	N		This site has been discounted for reasons of landscape sensitivity, access issues and flood risk. A gas pipe line crosses the site which, with its associated buffer zone reduces the available area for development.
GTAA/16/HC/O/6	Land adjacent to A49 Roundabout – Site C, Leominster	N		This site has been discounted because it is entirely within an area of Flood Zone 3. Furthermore, the landscape analysis concluded that this site is of high landscape sensitivity with low landscape capacity.
GTAA/16/HC/O/8	Ross Highway Depot	N		The site is located within the Ashburton Industrial estate. It is classified as being of good quality employment land and therefore if this site was to be progressed there would be a potential conformity issue with Policy E2, which safeguards best and good employment land from redevelopment to other non-employment uses.
GTAA/16/HC/O/10	Land at Homs Road Car Park, Ross-on-Wye	N – Temporary Stopping Place		Although this site was considered to offer potential for a temporary stopping place subject to further investigations, the site is no longer available for this use.
GTAA/16/02	Land at Midsummer Orchard, Ridge Hill	N		A recent appeal decision relating to this site concluded that the serious harm that would result from the development of a traveller pitch on this site would outweigh advantages in terms of increasing the supply of pitches.

SA Stage C: Preparing the Sustainability Appraisal report

The SA Report describes the process undertaken to date in carrying out the SA of the Herefordshire Travellers' Sites Pre-Submission Publication (September 2017). It sets out the findings of the site and policy options now included in the DPD, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the policies. It also describes the reasons for selecting or rejecting

certain options during the preparation of the DPD. All of this information is summarised in this Non-Technical Summary.

SA Stage D: Consultation on the Herefordshire Travellers' Sites DPD and the SA Report

Herefordshire Council is inviting comments on the Pre-Submission Publication version of the Herefordshire Travellers' Sites DPD and the SA Report which this Non-Technical Summary relates to. These documents are being published on the Council's website for consultation from 06th November 2017 to 18th December 2017.

SA Stage E: Monitoring Implementation of the Document

Recommendations for monitoring the social, environmental and economic effects of implementing the Herefordshire Travellers Sites' DPD are presented in **Chapter 7** of the SA Report and are summarised further ahead in this document.

Appraisal methodology

The site and policy options for the DPD have been appraised against the 19 SA objectives in the SA framework, with scores being attributed to each option, site or policy to indicate its likely sustainability effects on each objective, as shown in **Figure 1** below.

++	The option or policy is likely to have a significant positive effect on the SA objective(s).
++/-	The option or policy is likely to have a mixture of significant positive and minor negative effects on the SA objective(s).
+	The option or policy is likely to have a positive effect on the SA objective(s).
0	The option or policy is likely to have a negligible or no effect on the SA objective(s).
-	The option or policy is likely to have a negative effect on the SA objective(s).
-/+	The option or policy is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option or policy is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/- or ++/--	The option or policy is likely to have a mixture of minor positive and minor negative effects or a mixture of significant positive and significant negative effects on the SA objective(s).

Figure 1 Key to symbols and colour coding used in the SA of the Herefordshire Travellers' Sites DPD

Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.). Colour codes illustrating variations in the significance of mixed effects have been added to draw-out differences in the performance of site and policy options.

The likely effects of the options and policies need to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it would have a

noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Use of assumptions

SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, a detailed set of assumptions was developed and applied to the site options at Preferred Options stage and Pre-Submission Draft stage. These assumptions are set out in **Appendix 3** of the SA Report.

Difficulties encountered and data limitations

The SEA Regulations require consideration to be given to any difficulties that were encountered during the SA process, including any data limitations. A number of potential challenges have arisen during the SA, including the number of sites that needed to be subject to appraisal at various stages and the need to ensure that this was done in a consistent manner. In order to address this issue, detailed assumptions relating to each of the SA objectives were developed and applied during the appraisal of site options (as described above).

At previous stages of the SA process, the main difficulty related to the high level nature of the documents as the policy options lacked detail and therefore it was difficult to predict the likely effects of the options on each SA objective. However, during the SA of this iteration of the DPD, this issue has been addressed as full policy wording has been drafted.

Sustainability Context for Development in Herefordshire

Review of Plans, Programmes and Environmental Protection Objectives

The Herefordshire Travellers' Sites DPD is not prepared in isolation, being greatly influenced by other plans and programmes and by broader environmental protection objectives. It needs to be consistent with international and national guidance and strategic planning policies, and should contribute to the goals of a wide range of other programmes and plans. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and local level. A review has been undertaken of the plans, programmes and environmental protection objectives that are relevant to the Herefordshire Travellers' Sites DPD and the SA. This review has been amended since it was initially presented in the Scoping Report, as a result of consultees' comments and the preparation of new plans (see **Chapter 3** of the SA Report).

Herefordshire Local Plan Core Strategy 2015

Herefordshire Council adopted the [Herefordshire Local Plan Core Strategy 2011-2031](#) in October 2015. The Core Strategy sets out the strategic planning policies that the Council will pursue up to 2031 and makes provision for a total of 16,500 new homes and 148ha of employment land throughout the county up to 2031.

The Herefordshire Travellers' Sites DPD will build on and help to deliver Policy H4: Travellers' Sites in the Core Strategy, which sets out the Council's commitment to allocate land to meet 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 Herefordshire Travellers' Sites DPD includes a number of criteria-based policies to build on the provisions of Core Strategy Policy H4.

Other plans, programmes and environmental protection objectives

In addition to the Core Strategy, there are a wide range of other plans, policies and programmes at the international, national and local level that are relevant to the Herefordshire Travellers' Sites DPD. As part of the Scoping stage for the SA of the Core Strategy, a review was undertaken of the other plans and programmes that were relevant to the Core Strategy. This review, which was

updated throughout the preparation of the Core Strategy, was again reviewed for the purposes of the scoping exercise for the Herefordshire Travellers' Sites DPD. In particular, the Equalities Act 2010 was added to the list of relevant plans, programmes and environmental protection objectives as it specifically refers to Romany Gypsies and Irish Travellers as an ethnic group.

One key piece of legislation which is relevant to the Herefordshire Travellers' Sites DPD is the [Housing Act 2004](#), 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.

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.

The [National Planning Policy Framework](#) was published on 27th March 2012. It states that local planning authorities preparing plans for and taking decisions on travellers sites should also have regard to the policies in the NPPF so far as relevant.

The specific planning policies for Gypsy and Traveller sites are contained in the [Planning Policy for Traveller Sites](#) (DCLG, 2015).

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.

The Government guidance also states that local planning authorities should ensure that Traveller sites are sustainable economically, socially and environmentally.

In March 2016, the Department of Communities and Local Government (DCLG) published [Draft Guidance to local housing authorities on the periodical review of housing needs: Caravans and Houseboats](#). It explains how Government wants local housing authorities to interpret changes to accommodation needs assessments, specifically in relation to caravans and houseboats. The publication of finalised guidance is awaited.

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 five year period 2008-2012, 83 pitches were estimated to be needed over and above the 8 pitches already planned for the existing Bromyard site.

The [Gypsy and Traveller Accommodation Needs Assessments Guidance](#) was published in October 2007 and set out the detailed framework for designing, planning and carrying out Gypsy and Traveller accommodation needs assessments (GTAAs), including the needs of Showpeople as well as Gypsies and Travellers. The approach and methodology set out in the Guidance formed the framework for the GTAAs for Herefordshire Council, although the publication was withdrawn in December 2016. During the preparation of the Herefordshire Travellers' Sites DPD, there have been two iterations of the Herefordshire GTAA. In 2015, the [Herefordshire Gypsy and Traveller](#)

[Accommodation Assessment](#) (GTAA 2015) was published as an update to the [Draft Herefordshire Gypsy and Traveller Accommodation Assessment](#) (2013). In July 2017, the [Herefordshire Gypsy and Traveller Accommodation Assessment Update 2017](#) was published to provide a picture of current provision and activity across Herefordshire County and an assessment of future need. This updated GTAA has formed the basis of the determinant of need for accommodation for Travellers in the Herefordshire Travellers' Sites DPD.

The Herefordshire Travellers' Sites DPD will be subject to [The Conservation of Habitats and Species Regulations 2010](#) and [The Conservation of Habitats and Species \(Amendment\) Regulations 2012](#). A Habitats Regulations Assessment (HRA) must be carried out in order to establish whether the DPD will have any likely significant effects on European sites in and around Herefordshire. The information compiled for the HRA of the Core Strategy will be drawn on in the HRA, in particular the evidence associated with water quality issues in the River Wye SAC.

Baseline Information

In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in Herefordshire (see **Chapter 3** of the SA Report). As well as environmental issues, the baseline information includes a description of social and economic issues in Herefordshire.

There has been a travelling community in Herefordshire for the last 500 years. In the 2011 Census, 363 people living in Herefordshire identified themselves as 'White: Gypsy or Irish Traveller'. Although this is a small proportion of Herefordshire's total population (0.2%), in comparison to other authorities, the county has a relatively high proportion of Gypsies and Travellers within its population. Of the 125 households in Herefordshire that identified as 'White: Gypsy or Irish Traveller', 25 households lived in a caravan or other mobile or temporary structure and 100 households lived in bricks and mortar (house, bungalow, flat, maisonette or apartment).

According to the [Herefordshire Gypsy and Traveller Accommodation Assessment](#) (GTAA 2015), Gypsies and Travellers in Herefordshire have a notably younger age structure than the overall county population, with 33% being under the age of 16 compared with 17% in the overall population, and just 7% who are over the age of 65 compared with 21% of the overall population.

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 do¹⁰.

The [Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update 2017](#) (July 2017) (GTAA) states that the average household size is 2.9 persons for Gypsies and Travellers in Herefordshire County, which is higher than the average household size of 2.3 for the UK as a whole. There is some variation in the average Gypsy and Traveller household size between accommodation types with an average of 3.0 persons per household in houses/bungalows, 2.0 persons per household in flats/maisonettes/apartments and 3.1 persons per household in caravans/mobiles.

The bi-annual Department of Communities and Local Government (DCLG) [Traveller caravan count](#) indicates an average of around 188 caravans over the last five counts. Of these, 45.1% have been on private authorised sites (with planning permission) and 41.9% have been on social rented authorised sites. 12.2% have been on tolerated unauthorised sites. In the four counts during 2015 and 2016, two caravans were recorded on unauthorised sites; however, none were recorded in January 2017. No Travelling Showperson caravans have been recorded in Herefordshire from 2014-2017.

There are six authorised permanent Council-owned Gypsy and Traveller sites in Herefordshire. In addition, there are 29 authorised permanent private sites and one tolerated private site. There are three Travelling Showperson's yards. According to the GTAA 2017 Update, there are a total of 129 pitches, 119 households and 7 unoccupied pitches. Instances of short-term unauthorised encampments occur in the county every year, but there is now no longer any transit site provision

¹⁰ Health needs survey of Gypsies and Travellers in Herefordshire (2008)

in the county. The number of unauthorised encampments has risen between 2010 and 2016, with 68 reported unauthorised encampments within Herefordshire in 2010-2014 and with 124 reported unauthorised encampments in 2014-2016. It is estimated that there is a total need over the next five years (2017/18 to 2021/22) for 177 pitches in Herefordshire compared with a supply of 129 authorised pitches (including vacant pitches). This means that there is an estimated overall shortfall of 48 pitches over the period of 2017-2022.

In addition to this short-term need it is estimated that there is a total pitch need of 91 over the Local Plan period (to 2031), 33 sites of which present a PPTS need, before turnover on local authority pitches is considered. An analysis of Household Survey data shows that turnover is expected to result in an overall capacity of 84 pitches over the Plan period to 2031. The Household Survey indicates that there is further potential to help address pitch need over the plan period through the expansion of existing sites, which could generate an additional capacity of 11-17 local authority pitches and 9 privately authorised pitches. This means that there is no shortfall in pitches once turnover is considered.

Key Sustainability Issues and Likely Evolution without the DPD

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 the SA Report relates to (i.e. the Herefordshire Travellers' Sites DPD). **Table 4** below sets out the key sustainability issues for the County and, in line with the requirements of the SEA Regulations, consideration is also given to the likely evolution of the environment in Herefordshire if the DPD were not to be implemented.

Table 4 Key sustainability issues and likely evolution without the Herefordshire Travellers' Sites DPD

Key sustainability issues	Likely evolution without implementation of the Herefordshire Travellers' Sites DPD
Population change	
Relatively poor access to services and facilities	The issue of access to services and facilities for Gypsies and Travellers specifically would not be as well addressed without implementation of the specific Herefordshire Travellers' Sites DPD.
Affordable housing	
Shortfall of provision of affordable dwellings / increase in number of people accepted as homeless	Policy H4 in the Core Strategy seeks to provide affordable Traveller sites, in rural areas, where there is a case of local need. However, without the adoption of the Herefordshire Travellers' Sites DPD, there will be less certainty relating to the delivery of these pitches.
Travellers' Accommodation	
Established need for further pitches for Traveller families in the county	Policy H4 in the 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 Herefordshire Travellers' Sites DPD, 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.
Transport and accessibility	
Traffic congestion in Hereford and strain on existing infrastructure	The Herefordshire Travellers' Sites DPD is expected to take into account the need to travel and access to services 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 Herefordshire Travellers' Sites DPD is expected to take into account the risk of flooding when allocating sites and so this issue will be less well addressed

Key sustainability issues	Likely evolution without implementation of the Herefordshire Travellers' Sites DPD
	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 point-source discharges, therefore any increase in demand for water treatment in the vicinity of the site could exacerbate this problem.	Throughout the development of the 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 proposed development having adverse effects on water quality in the River Wye. The Herefordshire Travellers' Sites DPD 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 Herefordshire Travellers' Sites DPD.
Cultural Heritage	
High number of heritage assets within the county and the need to protect and enhance them and their settings.	Cultural heritage assets in Herefordshire are likely to come under pressure from the development proposed in the county, even without implementation of the Herefordshire Travellers' Sites DPD. Policies relating to the protection of the historic environment in the Core Strategy would continue to apply.
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 Herefordshire Travellers' Sites DPD. However, the infrastructure to support this change may come under strain, and the Herefordshire Travellers' Sites DPD should help to ensure sufficient provision of new waste facilities to a limited extent.

Sustainability Appraisal Findings – Pre-Submission Publication stage

Chapters 4-6 of the SA Report summarise the findings from the previous stages of SA of the Herefordshire Travellers' Sites DPD. This Non-Technical Summary does not summarise this information but focuses on the SA findings for the five site allocations and seven policies that are proposed by Herefordshire Council in the Herefordshire Travellers' Sites DPD Pre-Submission Publication (**Chapter 7** of the SA Report).

Pre-Submission Publication site allocations

A total of five Pre-Submission Publication site allocations have been identified by Herefordshire Council, following the appraisal of the eight Preferred Options (as outlined in **Chapter 6** of the SA Report), against the set of assumptions presented in **Appendix 3** of the SA Report, as well as the Council's own assessment of the sites. The Council's reasons for selecting the five Pre-Submission Publication site allocations and discounting the remaining three options are provided in **Table 3**. As shown in the list below, four of the sites are proposed for permanent residential pitches, and one is proposed as a temporary stopping place (transit pitch).

- **Site 1** (previously Site 2 in the Preferred Options and code GTAA/16/HC/O/4): Site adjacent to the roundabout on the A49, Leominster, Herefordshire: Temporary stopping place of five pitches.

- **Site 2** (previously Site 8 in the Preferred Options and code GTAA/16/03): Romany Close, Grafton, Herefordshire: One additional residential pitch. The site area has been reduced since Preferred Options stage and it is now proposed to only redevelop the former warden's office as a pitch and retain the play area on the site.
- **Site 3** (previously Site 4 in the Preferred Options and code GTAA/16/HC/O/2): Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham: Two additional residential pitches.
- **Site 4** (previously Site 7 in the Preferred Options and code GTAA/16/HC/O/12): Additional pitches at Openfields Caravan Site, Bromyard: Two additional residential pitches.
- **Site 5** (previously Site 6 in the Preferred Options and code GTAA/16/HC/O/11): Extension to Pembridge Caravan Site, Herefordshire: Four additional residential pitches. The site has been relocated following consultation comments received at Preferred Options stage and because of flooding issues highlighted in the SA of the Preferred Options. It is now proposed to extend the existing caravan site east rather than south as was proposed in the Preferred Options.

The likely sustainability effects (both positive and negative) of the Pre-Submission Publication site allocations are summarised in **Table 5** and the detailed SA matrices for the site allocations can be found in **Appendix 5** of the SA Report. Where relevant, effects are classified as short, medium or long-term. Consideration was also given to potential mitigation measures that could reduce or offset the negative effects identified.

SA findings of the Pre-Submission Publication site allocations

It is noted that Herefordshire Council is considering allocating a site as a temporary stopping place (Site 1: Site adjacent to the roundabout on A49, Leominster). The performance of this site and all the other site options against the SA objectives are not generally affected by whether they would be used for permanent residential pitches or temporary transit sites, as ideally temporary sites should still be well-located in relation to services and facilities such as schools and GP surgeries, even if residents would only make short term use of them. However, some of the effects on sensitive receptors, e.g. landscape and visual impacts might be more temporary in nature.

In general, the Pre-Submission Publication sites that are located close to the main towns of Herefordshire (Site 1: Site adjacent to the A49 roundabout, Leominster; and Site 2: Romany Close, Grafton) are likely to have the most positive effects on the SA objectives because they should offer good access to job opportunities, services and facilities and public transport links.

As with all of the Pre-Submission Publication sites, the two sites closest to the main towns of Herefordshire could still have negative effects on other SA objectives, particularly those relating to the environmental topics.

Most of the Pre-Submission Publication site allocations would have positive effects on access to **employment** opportunities (SA objective 1). Two sites would have significant positive effects because they are located in close proximity to one of Herefordshire's main towns, where most job opportunities are located, while a further two sites would have minor positive effects because, although they are not at the main towns, they are served by public transport links that would provide access to job opportunities. Only one site (Site 3: Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham) would have a minor negative effect as residents may have relatively poor access to employment opportunities, particularly without a car. The same range of effects are identified in relation to **reducing road traffic** (SA objective 4), because where sites are at the main towns there are likely to be good opportunities to walk, cycle and use public transport, and where sites are known to be connected by public transport, levels of car use are likely to be lower.

The two sites that scored significantly positively for SA objectives 1 and 4 are also expected to have significant positive effects on **recreation** (SA objective 6) as their proximity to the main towns of Herefordshire should provide relatively easy access to the recreational and cultural facilities that are concentrated there. The other three sites are all expected to have minor negative effects on recreation because, as well as being located away from the main towns, none are within very close proximity of a National Trail or Country Park.

The effects of the Pre-Submission Publication sites on **education** (SA objective 8) and **health** (SA objective 5) are broadly similar, as the same sites tend to be well-connected to schools and healthcare facilities, i.e. those that are closer to the larger towns and villages. Only two of the five sites scored positively for these SA objectives, as most of the other sites are in relatively rural locations, which are outside of walking distance to services and facilities such as schools, GPs and hospitals. A significant positive effect was identified for Site 2: Romany Close, Grafton in relation to education due its close proximity to Hereford Academy, Marlbrook Primary School and Blackmarston School.

All of the five Pre-Submission Publication sites would have at least minor positive effects on **housing** (SA objective 11) as all would go at least some way towards meeting the identified need for Traveller sites in Herefordshire. The larger two sites (Site 1: Site adjacent to the roundabout on the A49, Leominster; and, Site 5: Extension to Pembridge Caravan Site) are expected to have significant positive effects as they would provide a higher number of pitches. The timescales for developing the sites would influence whether effects are experienced in the short or medium term.

All of the Pre-Submission Publication sites are within at least 1km of a designated heritage asset such as a listed building or Scheduled Monument, so all could have at least minor negative effects on **cultural heritage** (SA objective 20) if the assets or their settings were to be adversely impacted by development nearby; such effects would be permanent and long-term for the residential pitches, but more temporary for the temporary stopping places. For Site 4: Additional pitches at Openfields Caravan Site, the negative effects could be significant as the site is within particularly close proximity (250m) of at least one heritage asset including the Down Lodge Grade II Listed Building.

Three of the Pre-Submission Publication sites could have a significant negative effect on **natural resources** (SA objective 14) as they are on greenfield land which is either Grade 1, 2 or 3 agricultural quality. Development on those sites could therefore result in the permanent loss of that land to agricultural uses. Where land is Grade 3, the potential significant negative effects are currently uncertain as it is not known if the land is Grade 3a or 3b (Grade 3a land is considered 'high' agricultural quality). The remaining two sites would have minor positive effects because they are on brownfield land. The same two sites would have minor positive effects on **efficient land use** (SA objective 19) because development on brownfield land represents more efficient use of land than the development of greenfield sites. The remaining three Pre-Submission Publication sites that are on greenfield land would have a minor negative effect on this objective. These effects would be permanent and long-term.

All of the Pre-Submission Publication sites could have at least minor negative effects on **biodiversity** (SA objective 13) as all are within at least 1km of a designated biodiversity site which could be affected by development nearby, for example as a result of disturbance from noise, increased recreation pressure or direct damage to habitats and species. Effects could be short term if they are associated with noise and disturbance from construction, or longer term, for example effects associated with increased recreation pressure. For two sites, the negative effects could be significant as they are within particularly close proximity (250m) of a biodiversity designation. However, in all cases effects are uncertain as they will depend on the detailed proposals for the Traveller sites and the particular sensitivities of the biodiversity sites and features close to them.

The effects of the Pre-Submission Publication sites on the **landscape** (SA objective 15) have been assessed by Herefordshire Council as part of its internal site assessment process. One site was assessed as being of medium-high sensitivity to development and so could have a significant negative effect, which would be long-term and permanent for Site 6.

One of the site options (Site 1: Site adjacent to the A49 roundabout, Leominster) could have a significant negative effect on **flood risk** (SA objective 17) as it is located on greenfield land which is within flood zones 2 and 3. In addition, an increase in impermeable surfaces in this area could have adverse impacts on increasing flood risk within the site and elsewhere as a result of reduced infiltration. The site is proposed as a Temporary Stopping Place, which could reduce the risk to residents as the site could be avoided at times of flooding. A further two of the Pre-Submission Publication sites could have minor negative effects because they are either on greenfield land

(and therefore likely to increase impermeable surfaces) but outside of flood zones 2, 3a or 3b, or they are on brownfield land but within flood zones 2, 3a or 3b.

All of the Pre-Submission Publication sites would have negligible effects on the remaining SA objectives, as those issues would not be affected by the spatial location of Traveller sites, as explained in the assumptions in **Appendix 3** of the SA Report.

SA findings of the Pre-Submission Publication policies

The policies set out in the DPD are, with two exceptions, site-specific – providing detailed parameters for development of the proposed allocation sites. The remaining two (TS1 and TS2) provide general principles for the development of residential Traveller pitches and sites, and Travelling Showpeople plots respectively. As such, the other policies and the SA findings should be read in the context of the site assessments and the need for a policy response to particular issues. The likely sustainability effects (both positive and negative) of the Pre-Submission Publication policies are summarised in **Table 6** and the detailed SA matrices for the policies can be found in **Appendix 6** of the SA Report.

The policies in the Herefordshire Travellers' Sites DPD Pre-Submission Publication are as follows:

Policy TS 1: Residential Traveller Pitches and Sites

The policy is assessed as having a negligible effect on education and employment objectives, as it contains no specific requirements in this regard. The requirement for provision of play facilities in the policy, along with the requirement to have regard to appropriate health and safety considerations, and provisions in relation to the keeping of animals, gives rise to a predicted minor positive effect in relation to **health**. Negligible effects are predicted in relation to crime and poverty alleviation objectives, as no specific policy response is provided.

Minor positive effects in relation to **traffic and transport** are recorded due to the provision requiring proposals to have good accessibility to the road network. The policy requirement for development of community facilities on site generates a minor positive effect in relation to **accessibility of educational, cultural and recreation** activities.

A significant positive effect, at the scale of the local Traveller population, is recorded in relation to the policy support for appropriate provision of new Traveller pitches and sites, thereby enhancing provision of appropriate **housing** or equivalent pitches for caravans. However, the policy does not require new developments of this type to be located either on previously developed land, or concentrated in/adjacent to urban areas to improve accessibility of services. A minor negative effect is therefore assessed in relation to **ensuring integrated, efficient and balanced use of land**. It is recommended that a criterion to this effect is added to the policy in the next iteration of the DPD.

It is noted that the policy has not been revised to reflect Historic England's recommendation that the design of sites should avoid / mitigate any potential impacts on the **historic environment** (designated or non-designated heritage assets). The policy wording should be updated to prioritise avoidance of impacts, ensuring that the character and significance of affected assets is appropriately understood and conserved by development proposals. A mixed effect is likely with current policy wording (significant negative/minor positive). It is therefore recommended that clause 1 of the policy is amended to include appropriate references to the historic environment.

A minor negative effect is anticipated in relation to **climate change** in that the policy is essentially required to facilitate use of private vehicles, creating greenhouse gas emissions. A neutral effect is anticipated with regard to **biodiversity** as, although the policy requires 'unacceptable adverse impacts' to be mitigated this confers no overall benefit to the objective. (A positive effect could be delivered through minor amendments to the policy to prioritise the avoidance of adverse effects by design, and to require mitigation of all adverse effects and, where appropriate, to conserve and enhance on-site features of conservation value.)

A minor negative effect is anticipated in relation to **waste** as the policy does not require proposals to provide appropriate waste management and recycling facilities on site (in line with Policy H4 of the Core Strategy). It is recommended that a criterion to this effect is added to the policy in the next iteration of the DPD.

A minor positive effect is anticipated in relation to **landscape**, as the policy supports good quality design, respecting local landscape character. Minor positive effects in relation to **flood risk** and **pollution prevention** as the policy requires the use of SuDS to manage surface water and requires appropriate connections to the sewerage system, along with preventing light pollution through the use of appropriate lighting solutions.

Policy TS 2: Travelling Showpeople Plots

The policy is also assessed as having a negligible effect on education and employment objectives, as it contains no specific requirements in this regard. Minor positive effects are predicted in relation to **health** and **education**, as year-round accommodation will enable more elderly members of the community – along with parents and young children – to access consistent healthcare, and for school-age children to access schooling.

Minor positive effects are predicted in relation to crime prevention as the live-work element of the sites will help to ensure the security of both equipment stored on site and, due to predicted year-round occupancy, reduce any fear of **crime** or antisocial behaviour occurring.

The policy is likely to have a minor negative effect on road **traffic**, as sites are explicitly required to have good access to the strategic road network; some degree of disruption could occur as a consequence of large/outsize load HGVs to more equipment. Mixed effects are predicted in relation to ensuring a **balanced use of land**, in that the policy effectively encourages edge-of-town sites to facilitate access to the road network, potentially contributing to low density development – a less sustainable use of land. The policy could be amended to encourage new developments to be located on previously developed land, where appropriate.

Potentially significant negative effects may occur on the **historic environment**, as the policy makes no reference to the need to conserve the fabric and setting of heritage assets (in line with NPPF). It is therefore recommended that clause 7 of the policy is amended to include appropriate references to the historic environment. A significant negative effect is also predicted in relation to biodiversity, as no reference is currently made to conserving any natural heritage sites. Further amendments to the policy are therefore required.

A minor positive effect is predicted in relation to the provision of **housing** which, while negligible at a whole-population level, is likely to be important for Herefordshire's Travelling Showpeople.

A minor negative effect is anticipated in relation to **waste** as the policy does not require proposals to provide appropriate waste management and recycling facilities on site when the site is occupied (in line with paragraph 4.24 of the DPD). It is recommended that a criterion to this effect is added to the policy in the next iteration of the DPD.

Minor positive effects are anticipated on **landscape** – through appropriate provision to conserve and enhance boundary features – and for **flood risk**, as the policy explicitly asks applicants to incorporate measures to reduce risk.

Significant negative effects are predicted in relation to **pollution**. At present, the policy does not currently contain explicit measures to control pollution. This is a potential risk in relation to the storage and maintenance of HGVs, plant and large-scale fairground/show equipment. Substantial quantities of diesel and other hydrocarbon-based fuels and lubricants (e.g. for generators, plant and equipment) are likely to be contained both within vehicles/machinery and may also be stored on site. Leakage may result in pollution incidents, potentially entering groundwater or watercourses in addition to contaminating soils. Use of HGVs and testing/repair of equipment will generate carbon emissions and may have a local effect on air quality where such activity is extensive. It is therefore recommended that clause 6 is expanded to include pollution prevention and control measures where vehicles, plant and machinery will be stored and/or maintained on site.

Policy TS 3: Site adjacent to the roundabout on A49, Leominster

As site-specific policy, TS 3 will have a negligible effect against the majority of SA objectives. It will, however, have a minor positive effect with regard to **housing** – providing necessary temporary pitches.

As the policy makes no specific reference to the need to conserve the **historic environment**, there is the potential for minor negative effects. The associated site assessment indicates that

there is some potential for adverse effects to heritage assets, therefore the policy could usefully be strengthened to avoid adverse effects to the character and significance of heritage assets.

Minor negative effects are also identified with regard to **waste** management. While the site will not be permanently occupied, ensuring that waste arisings are appropriately dealt with should be added to the policy (as specified in paragraph 4.24 of the DPD).

A minor negative effect is identified in relation to **flood risk** as the Environment Agency confirmed that, although the site is not within flood zones 2 and 3, a sequential approach to the layout of the site may be required based on any further information regarding flood risk. Therefore, it is recommended that a sequential approach to the layout of the site is included as a criterion in the policy.

Potential minor negative effects were also identified in relation to **pollution**, with the use of temporary sanitation facilities on site posing a potential risk to the River Lugg. It is recommended that a clause is added to the policy to apply appropriate pollution prevention measures.

Policy TS 4: Romany Close, Grafton, Herefordshire

The policy is assessed as having negligible effects in relation to objectives under the following topics: education and employment; healthy and prosperous communities; resource consumption and climate change; and, transport and access.

A minor positive effect is recorded in relation to the provision of appropriate accommodation (under the **housing** objective). While just a single pitch, this is a potentially valuable addition to local capacity for the Traveller community. A minor positive effect is also identified for **flood risk**, with the policy requiring the provision of a surface water drainage strategy for the site – potentially helping to reduce the risk of flooding for the pitch and the wider Traveller site.

Policy TS 5: Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham

This site-specific policy also has negligible effects on: education and employment; resource consumption and climate change; and, healthy and prosperous communities objectives.

The policy will have an uncertain effect on local **traffic** as there is insufficient information on current traffic levels to determine whether access either through the existing junction or new provision would result in positive or negative effects on flows and safety.

As the policy supports the delivery of an additional two residential pitches, a minor positive score is recorded in relation to **housing**.

The use of brownfield land for the additional pitches generates a minor positive effect on **use of natural resources**, encouraging regeneration of the resource and potentially facilitating decontamination. However, a minor negative effect is likely on **landscape** character and quality as the policy makes no reference to landscape conservation or enhancement. An addition to the policy to prioritise the retention of existing boundary trees and hedgerows could mitigate this effect both at a site and policy level.

Policy TS 6: Additional pitches at Openfields Caravan Site, Bromyard

In common with other site-specific policies, TS 6 also will have negligible effects on: education and employment; healthy and prosperous communities; resource consumption and climate change and, transport and access objectives.

Similarly, it will have a positive effect on **housing** through the provision of an additional two residential pitches.

The policy is likely to have a minor positive effect on **landscape** as it requires enhancement of the site's boundary treatment, potentially improving the character and appearance of the site. Uncertain effects are recorded for **flood risk**. The policy requires the submission of a flood risk statement with any application; although the site is at comparatively low risk the uncertainty means that nature and significance of effects cannot be determined.

Policy TS 7: Extension to Pembridge Caravan Site, Herefordshire

Negligible effects were recorded in relation to: education and employment; and, healthy and prosperous communities objectives.

A minor positive effect in relation to **equality of access to facilities** will occur as a consequence of the policy requirement for the provision of a suitable and safe on-site play area for children.

An uncertain minor negative effect is expected in relation to **transport** as the policy requires access to the additional pitches via the existing route onto the highway. This could result in a minor adverse effect if this were to result in a substantial increase in traffic activity at what is a junction with limited visibility.

As the policy supports the creation of four new residential pitches, a minor positive effect will be generated on the **housing** objective. However, the potential for minor negative effects on the **historic environment** are likely due to the lack of policy requirements to understand, conserve and enhance heritage assets potentially affected by the development. (The supporting text identifies the potential for adverse effects to two designated assets.) The policy should be amended to require the provision of an appropriate heritage impact assessment/heritage statement with any application. A minor positive effect is, however, recorded for **landscape** as the policy makes reference to delivering appropriate enhancement to reflect local character.

Cumulative effects

The limited number of sites (including a number of existing sites), their small scale and dispersed nature means that significant cumulative effects are very unlikely. The Travellers' Sites DPD should result in positive cumulative effects in terms of the SA Housing objective. The appraisal of individual sites has identified the potential for a range of adverse effects on the historic assets specific to particular sites. In line with Historic England's recommendations at Preferred Options consultation stage, these could be avoided or minimised as a result of modifications to policy wording. The appraisal identified the development of sites in three greenfield locations as impacting on natural resources, though the scale of change is likely to be minor overall. Policy wording should ensure that significant adverse cumulative effects on biodiversity are avoided, however, there is potential to ensure that development of these sites results in a positive cumulative effect on biodiversity.

Mitigation and recommendations

Policy TS 1: Residential Traveller Pitches and Sites

It should be noted that this policy was revised based on a recommendation in the SA of the Preferred Options to require applicants to submit details of any animals that are to be kept on site with the planning application.

It is recommended that the policy (clause 1) is amended to read "*An overall good quality of design which respects the setting of the site, local landscape character, and the character and significance of **designated and undesignated heritage assets***" to take into account Historic England's recommendation. This would have the effect of changing the current mixed effect of the policy to a neutral effect.

It is recommended that the policy is amended to include a new criterion relating to the provision of appropriate waste management and recycling facilities. Minor amendments to the policy are also recommended to encourage the development of previously developed land in preference to greenfield land or land primarily near urban areas which would reduce the need to travel to access services.

It is recommended that minor amendments are made to the policy to prioritise the avoidance of adverse effects on biodiversity through good design, to require mitigation of all adverse effects and, where appropriate, to conserve and enhance on-site features of conservation value. This would have the effect of changing the current neutral effect of the policy to a minor positive effect.

Policy TS 2: Travelling Showpeople Plots

It is therefore recommended that clause 7 of the policy is amended to read "*An overall good quality of design which respects the setting of the site, local landscape character, and the character and significance of **designated and undesignated heritage assets***" to take into account Historic England's recommendation. This would help avoid potentially significant negative effects.

It is recommended that the policy is amended to include a new criterion requiring proposals to provide appropriate waste management and recycling facilities on site when the site is occupied (in line with paragraph 4.24 of the DPD).

It is recommended that the policy is amended to include reference to avoiding or mitigating adverse effects on biodiversity and where appropriate, conserving and enhancing on-site features of conservation value. This would help avoid potentially significant negative effects and result in neutral or minor positive effects.

It is recommended that clause 6 is expanded to include pollution prevention and control measures where vehicles, plant and machinery will be stored and/or maintained on site. This will help avoid significant negative effects in relation to pollution.

Policy TS 3: Site adjacent to the roundabout on A49, Leominster

It is recommended that policy should be strengthened to avoid adverse effects to the character and significance of heritage assets.

It is recommended that the policy is amended to include a new criterion requiring proposals to provide appropriate waste management and recycling facilities on site when the site is occupied (in line with paragraph 4.24 of the DPD).

It is recommended that a sequential approach to the layout of the site is included as a criterion in the policy.

It is recommended that a clause is added to the policy requiring appropriate pollution prevention measures relating to temporary sanitation facilities.

Policy TS 4: Romany Close, Grafton, Herefordshire

No recommendations were identified in relation to this policy.

Policy TS 5: Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham

It is recommended that a clause is added to the policy requiring the retention of existing boundary trees and hedgerows.

Policy TS 6: Additional pitches at Openfields Caravan Site, Bromyard

No recommendations were identified in relation to this policy.

Policy TS 7: Extension to Pembridge Caravan Site, Herefordshire

It is recommended that the policy should be amended to require the provision of an appropriate heritage impact assessment/heritage statement with any application.

Table 5 Summary of SA Scores for the Pre-Submission Publication DPD site allocations

SA Objective	Site 1 (PO Site 2)	Site 2 (PO Site 8)	Site 3 (PO Site 4)	Site 4 (PO Site 7)	Site 5 (PO Site 6)
1. Employment opportunities	++?	++	-	+	+
2. Skilled workforce	0	0	0	0	0
8. Education	+?	++	-	-	-
5. Health	+	+	-	-	-
9. Reduce and prevent crime	0	0	0	0	0
10. Reduce poverty	0	0	0	0	0
4. Reduce road traffic	++?	++?	-	+	+
6. Recreation	++?	++	-	-	-
11. Housing	++	+	+	+	++
19. Land use	-	+	-	+	-
20. Cultural heritage	-?	-?	-?	--?	-?
12. Reduce waste	0	0	0	0	0
14. Natural resources	--?	+	--?	+	--?
16. Climate change	0	0	0	0	0
13. Biodiversity	-?	--?	-?	--?	-?
15. Landscape quality	0	0	0	0	--?
17. Flood risk	--	0	-	0	-
18. Minimise pollution	0	0	0	0	0

Table 6 Summary of SA scores for the Pre-Submission Publication DPD policies

SA Objective	TS1	TS2	TS3	TS4	TS5	TS6	TS7
1. Employment opportunities	0	0	0	0	0	0	0
2. Skilled workforce	0	0	0	0	0	0	0
8. Education	0	0	0	0	0	0	0
5. Health	+	+	0	0	0	0	0
9. Reduce and prevent crime	0	+	0	0	0	0	0
10. Reduce poverty	0	0	0	0	0	0	0
4. Reduce road traffic	+	-	0	0	?	0	-?
6. Recreation	+	+	0	0	0	0	+
11. Housing	++	+	+	+	+	+	+
19. Land use	-	+/-	0	0	0	0	0
20. Cultural heritage	+/--?	--?	-?	0	0	0	-
12. Reduce waste	-	-	-	0	0	0	0
14. Natural resources	0	0	0	0	+	0	0
16. Climate change	-	-	0	0	0	0	0
13. Biodiversity	0	+/--	0	0	0	0	0
15. Landscape quality	+	+	0	0	-	+	+
17. Flood risk	+	+	-	+	0	?	0
18. Minimise pollution	+	--	-	0	0	0	0

Monitoring

The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. **Table 7** sets out a number of suggested indicators for monitoring the potential significant (positive and negative) sustainability effects of implementing the Herefordshire Travellers' Sites DPD.

Table 7 Proposed Monitoring Framework for the Herefordshire Travellers' Sites DPD

SA objectives for which likely (or uncertain) significant negative effects have been identified for the DPD	Proposed monitoring indicators
Biodiversity	Periodic monitoring of designated sites (e.g. SSSI, SINCs) should identify changes in condition/integrity; causation can then be investigated and, if attributable to development, appropriate remediation and mitigation measures designed.
Natural resources	Loss of agricultural land should be monitored at the district level, with existing areas of calculated for each of the higher quality classes. Where schemes come forward that are likely to result in the loss of this resource, the proposed loss can be understood in terms of its cumulative effect on the district's resources.
Landscape quality	Percentage of land in areas that are of high to medium sensitivity.
Flood risk	Development in areas at risk of flooding should be monitored at the district level – recording applications and consents within Zone 2 and 3, whether site-specific FRA was required, the outcome and its influence on the determination.
Minimise pollution	<i>Pollution monitoring, event identification, mitigation and, where necessary, legal recourse lie outside of planning control.</i> Environment Agency monitoring of groundwater and rivers may assist in the identification of point-source and diffuse pollution. Where this can be proved to be related to development, this should be recorded at the district level and – if necessary – planning enforcement action sought to remedy issues (if within planning control).
Cultural heritage	Condition monitoring is not routinely undertaken for either designated or non-designated heritage assets. Avoidance of impacts, in line with recommended policy changes, should be prioritised – thereby removing the potential for significant effects.

Conclusions

The five sites and seven policies set out in the Pre-Submission Publication version of the Herefordshire Travellers' Sites DPD have been subject to appraisal against the SA objectives which were developed at the scoping stage.

In general, the sites that are located close to the main towns of Herefordshire are likely to have the most positive effects on the SA objectives because they should offer good access to job opportunities, services and facilities and public transport links. All of the sites could still have negative effects on other SA objectives, particularly those relating to the environmental topics, though most effects are likely to be avoided as a result of site and policy criteria. The principal exception relates to the historic environment where the potential for a number of adverse impacts remains. It is recommended that these are addressed in relation to specific sites and through modification of Policy TS1 and Policy TS2. A number of other recommendations are designed to avoid other potential impacts or to enhance positive effects. Recommended changes will help ensure no significant cumulative impacts occur.

Next Steps

This NTS and the SA Report will be available for consultation alongside the Herefordshire Travellers' Sites DPD Pre-Submission Publication from 06th November 2017 to 18th December 2017.

Following consultation of the Herefordshire Travellers' Sites DPD Pre-Submission Publication, the responses received and the findings of the SA will be taken into account by Herefordshire Council as it prepares the next iteration of the DPD.

LUC
November 2017