

Herefordshire Local Plan
Travellers' Sites Development Plan
Document

Sustainability Appraisal/Strategic
Environmental Assessment Report

October 2019

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1.0 Introduction

- 1.1 Herefordshire Council adopted the Herefordshire Local Plan – Travellers Sites Development (DPD) Plan 2014- 2031) on 11th October 2019.
- 1.2 During the preparation of the DPD, the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the DPD during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Herefordshire Council to make the final SA Report available alongside the Adopted Local Plan.
- 1.4 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the Adopted Local Plan, the SEA Regulations also require a number of steps to be taken upon adoption of a local plan (in this case the Herefordshire Travellers DPD). Specifically, SEA Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an ‘SEA adoption statement’, and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.5 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Herefordshire Local Plan. The document is structured according to the SEA Regulation requirements listed above:
- 1.6 The final SA Report for the Adopted DPD should be read alongside the component SA reports carried out at the various stages of the plan making process. All these reports are available on the Council’s website as follows:
 - SA scoping report June 2014 - https://www.herefordshire.gov.uk/download/downloads/id/1589/travellers_sites_sustainability_appraisal_scoping_report_june_2014.pdf
 - Issues and Options Paper SA August 2014 - https://www.herefordshire.gov.uk/download/downloads/id/1583/issues_and_options_paper_-_august_2014.pdf
 - Preferred Options Consultation July 2016 - https://www.herefordshire.gov.uk/download/downloads/id/13209/travellers_sites_preferred_options_sa_report_july_2016.pdf
 - Pre-submission Publication November 2017 - https://www.herefordshire.gov.uk/download/downloads/id/11861/sustainability_appraisal_-_travellers_sites_dpd_-_november_2017.pdf
https://www.herefordshire.gov.uk/download/downloads/id/11862/non-technical_summary_-_sustainability_appraisal_travellers_sites_dpd_-_november_2017.pdf
 - Additional Sites Consultation August 2018

https://www.herefordshire.gov.uk/download/downloads/id/16229/sustainability_assessment_for_additional_travellers_sites.pdf

- Main Modifications May 2019

https://www.herefordshire.gov.uk/download/downloads/id/18030/sustainability_appraisal_and_habitats_regulations_assessment_second_addendum_may_2019.pdf

2.0 How environmental and sustainability considerations have been integrated into the Herefordshire Local Plan – Travellers Development Plan Document

- 2.1 The Sustainability Appraisal (SA) of the Travellers' Sites Development Plan Document (DPD) has been carried out in an integrated manner encompassing Strategic Environmental Assessment (SEA). This integrated process is reflected in the Sustainability Appraisal reports produced at the various stages of the production of the DPD. This integrated approach accords with guidance contained in the Planning Practice Guidance (PPG) which states that "Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment .Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues." The requirements of the SEA Directive and Regulations are set out in Table 1.1 of the SA Report November 2017 and the legislative requirements have informed the development of the DPD. Each SA stage included a table to show how the requirements of the SEA Directive have been met within this SA report
- 2.2 The SA process started in June 2014 when a Scoping Report for the DPD, was produced by Herefordshire Council (the Council). The Scoping Report established the range and level of detail for the SA and provided base data used for the SA Report. It identified draft SA objectives, and outlines the draft SA Framework and site checklist tools. The Scoping Report was issued for consultation with various stakeholders including the statutory consultees for SEA - Natural England, the Environment Agency and English Heritage. Consultation responses received to the Scoping Report are shown in section 4 of this report.
- 2.3 In 2014 the Council commissioned independent consultants Land Use Consultants (LUC) who specialise in SAs, SEAs and HRAs and LUC continued the SA work at subsequent stages of the process. The purpose of the SA was to assist the Council identify the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the DPD on these issues, and to put forward recommendations to improve the DPD.
- 2.4 The SA process has been carried out in an iterative manner throughout the plan making process. Chapter 2 of the SA Report 2017 explains how the SA process has been undertaken at each stage in the plan making process and how it has provided sustainability guidance and informed its development. Following the SA Report 2017, two further stages of SA were carried out on the Additional Sites Consultation and Main Modifications stages, during the examination process. At every stage a review of the baseline data and policy context has taken place as well as a review of significant changes made to the policies and proposals, or new options as relevant, to determine the sustainability implications of the changes and whether any additional SA work was needed. Furthermore at each stage of the plan preparation process, policies and proposals of the Travellers' Sites DPD have been the subject of consultation and some have been subsequently appropriately amended. Consequently the SA process has been repeated where necessary to take into account any changes made as a result of consultation and/or where additional evidence has become available. This approach has ensured a thorough process resulting in a reliable and robust SA.

- 2.5 Different levels of detail were used at various stages of the SA process. This reflects the need to ensure that the process was proportionate and has reflected the nature of the evolution of the DPD. At the early stages of preparation it considered issues and options and at further stages more detailed appraisal matrices as the plan has identified specific sites and become a more detailed development management type document. The approach used at each stage was consistent across the whole appraisal at the time.
- 2.6 The SA framework for the Local Plan was originally presented in the 2014 SA Scoping Report prepared by Herefordshire Council and included a draft framework of SA objectives grouped into themes to enable related sustainability issues to be considered together during the appraisal. The six themes are as follows:
- 1 Education and employment.
 - 2 Healthy and prosperous communities.
 - 3 Transport and access.
 - 4 Built environment.
 - 5 Resource consumption and climate change.
 - 6 Natural environment.
- 2.7 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” options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations of the county with regard to social, economic and environmental considerations.
- 2.8 Table 1 shows the SA objectives considered within each theme. 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 1 SA Framework for the Herefordshire Travellers’ Sites Document

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 ⁷

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

SA Objective	Appraisal Question	SEA Topic covered by objective
	and encourages positive community interaction.	
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	Material assets, Population

SA Objective	Appraisal Question	SEA Topic covered by objective
	transport and/or as a catalyst for urban and rural regeneration.	
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.	<p>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).</p> <p>11.2 Increase the supply of affordable housing.</p> <p>11.3 Reduce the percentage of unfit homes/empty homes.</p> <p>11.4 Improve the energy and resource efficiency of homes and 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>	Population Material assets
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.	20.1 Preserve, protect and enhance Conservation Areas, Listed Buildings, archaeological remains, and other features and areas of historical heritage and cultural value e.g. locally listed buildings.	Cultural

SA Objective	Appraisal Question	SEA Topic covered by objective
	<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>	
Resource Consumption and Climate Change		
<p>12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.</p>	<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
<p>14. Use natural resources and energy more efficiently.</p>	<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
<p>16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.</p>	<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

SA Objective	Appraisal Question	SEA Topic covered by objective
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
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

SA Objective	Appraisal Question	SEA Topic covered by objective
18. Minimise local and global pollution and protect or enhance environmental resources.	18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution. 18.2 Protect and enhance the quality of watercourses. 18.3 Provide opportunities to improve soil quality or reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking.	Water, air, soil

- 2.9 The Travellers' Sites DPD has been subject to a Habitats Regulations Assessment (HRA) carried out in order to establish whether the plan will have any likely significant effects on European sites in and around Herefordshire. As with the work on the SA, Herefordshire Council commissioned LUC to prepare the HRA of the Travellers' Sites DPD. The information compiled for the HRA of the Herefordshire Local Plan Core Strategy was drawn on in undertaking the HRA, in particular the evidence associated with water quality issues in the River Wye SAC.
- 2.10 The effects considered to be relevant to the Herefordshire Travellers' Sites DPD (as for Policy H4: Traveller Sites of the Herefordshire Local Plan Core Strategy) are:
- Physical disturbance/damage (due to development occurring within or adjacent to European sites or off-site foraging habitats).
 - Erosion/trampling (due to recreation pressure from people walking or carrying out other activities such as fishing/canoeing etc. within European sites).
 - Non-physical disturbance such as noise, vibration and light pollution (during construction of development sites for noise and vibration, and occupation of sites for light pollution, which is particularly important for nocturnal species such as bats).
 - Air pollution (associated with significant increases in traffic above annual average daily flows along routes within 200m of European sites).
- 2.11 The first stage of the HRA was undertaken at the Preferred Options stage in the plan preparation once potential Travellers' sites had been identified). The HRA concluded that most of the European sites are some distance away from the proposed travellers' sites and are unlikely to be affected by the proposals, due to their scale. The only European site in close proximity to any of the proposed sites is the River Wye SAC. Although five of the sites were considered to be close enough that recreational activities could increase physical disturbance/damage, or erosion/trampling. However, in all cases, the scale of development was considered to be very small and unlikely to result in significant effects.
- 2.12 The HRA undertaken upon the pre-submission Travellers' Sites DPD came to the same conclusion. Further HRAs were carried out in relation to the additional sites and main

modifications stages of the examination process. With regards to the two additional sites identified the HRA concluded that there was potential for the proposed site at Land at Stoney Street, Madley to result in an increase in physical disturbance/damage, or erosion/trampling to the River Wye SAC. However, again due to the small scale of the development and the location of the site approximately 3.5km from the River Wye SAC, it was considered unlikely for significant effects on the European site to occur. It should be noted that this site was not allocated in the adopted DPD but the broad location identified as having potential for a site for the longer term and to be considered as part of the forthcoming core strategy review. The HRA of the Herefordshire Travellers' Sites DPD Main Modifications concluded that the DPD as proposed to be modified through the Main Modifications will not result in a likely significant effect on any European site.

- 2.13 The HRA of the Herefordshire Travellers' Sites DPD Main Modifications concluded that the DPD as proposed to be modified through the Main Modifications will not result in a likely significant effect on any European site.

3.0 How the Environmental/SA Report has been taken into account

- 3.1 As stated in section 1, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the DPD's development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. The findings and recommendations of the SA were taken into account while making changes to the DPD before each round of public consultation.
- 3.2 Table 2 shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the DPD preparation, and how any recommendations made were taken into account.

Plan making stage	Accompanying SA Work	How SA Report was taken into account
N/A	SA Scoping Report (2014) produced by Herefordshire Council.	The SA Scoping Report represented the first stage in the production of the SA Report. It the range and level of detail for the SA, and the overall structure and contents of the final SA Report. It also provided base data which was used for the SA reports, it identified draft SA objectives, and developed the draft SA Framework and site checklist tools, which then featured in the site assessment process.
Issues and Options Paper 2014		Each option was assessed against each SA objective (excluding those scoped out, see Table 1 above), and a judgement made with regards to the likely effect that it would have on that objective. These judgements were recorded as a colour coded symbol and the sustainability effects are presented in a matrix for each option (see Appendix 2 of the Issues and Options SA) along with a brief justification of the judgement made. Because the options were very high level at that stage, there was a large number of uncertainties relating to their likely effects. While the policy options would have generally significant positive effects on housing, as their underlying aim is to deliver permanent and transit pitches for Travellers to meet local need, a number of potential negative effects were identified, particularly in relation to the environmental SA objectives. However, these effects will depend largely on the specific location of the sites that are eventually allocated in the plan which would be considered in more detail during the next stage of the SA. The plan was to also include more detailed policy wording, which will in turn enable a more detailed and less uncertain appraisal of the likely effects.
Preferred options consultation 2016		The eight Preferred Traveller sites and two broad policy approaches set out in the Preferred Options version of the Herefordshire Travellers' Sites Document were subject to

		<p>appraisal against the SA objectives which were developed at the scoping stage.</p> <p>This SA stage concluded that in general, the three preferred 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. As with all of the preferred sites, the three sites closest to the main towns of Herefordshire could still have negative effects on other SA objectives, particularly those relating to the environmental topics. It advised that careful consideration was needed about the ways that these effects could be mitigated, and reference was included in the list of constraints and opportunities for the sites. The SA advised that when these are worked up in more detail in the next version of the DPD, that close attention should be paid to mitigating the significant negative effects identified for each site.</p> <p>The SA report advised that implementation of policies in the Core Strategy and the potential inclusion of the Site Design criteria-based policy in the next version of the Travellers' Sites Document should help to mitigate the potential negative effects of developing new or extended Travellers' sites. Policies TS1 and TS2 were therefore included in the DPD taking on board the recommendations in the SA and site specific policies were also included for each site allocation.</p>
<p>Pre-submission Draft November 2017</p>		<p>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 proposed 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 were set out in Chapter 7 of the pre-submission SA Report with the detailed SA matrices presented in Appendix 5 and Appendix 6 of that Report.</p> <p>The five sites and seven policies set out in the Pre-Submission Publication version of the Herefordshire Travellers' Sites DPD were subject to appraisal against the SA objectives which were developed at the scoping stage.</p> <p>In general, the sites 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 related to the historic</p>

		<p>environment where the potential for a number of adverse impacts remains. It was recommended that these should be addressed in relation to specific sites and through modification of Policy TS1 and Policy TS2. A number of other recommendations were made to avoid other potential impacts or to enhance positive effects. Recommended changes will help ensure no significant cumulative impacts occur. The recommendations made in the sustainability appraisal at this time were considered by officers of the council and a response to each was given in the Submission Document: Summary of main points raised during pre-submission consultation - February 2018 The Inspector then considered these matters as part of the examination process.</p>
<p>Additional Sites October 2018</p>		<p>The two additional sites identified during the Travellers' Sites DPD examination to address the shortfall in deliverable pitches over the plan period were subject to appraisal against the SA objectives which were developed at the scoping stage.</p> <p>Both sites are expected to have significant positive effects for SA objective 11: Housing. However, the Land at Stoney Street, Madley site is likely to have more positive and less negative effects overall than the Land at Oakfield, Nashend Lane, Bosbury site. For the Land at Stoney Street, Madley site, minor positive effects are expected for SA objectives 1: Employment, 4: Reduce road traffic, 19: Land use, and 14: Natural resources while minor negative effects are identified for these SA objectives in relation to the Land at Oakfield, Nashend Lane, Bosbury site. An uncertain significant negative effect is expected for SA objective 20: Cultural heritage for the Land at Oakfield, Nashend Lane, and Bosbury site. However, the potential impact on the historic environment, specifically a nearby Grade II Listed Building, from the development of this site can be mitigated through policies <i>TS1 – Residential Traveller Pitches and Sites</i> and <i>H4: Traveller sites</i> (Core Strategy policy).</p> <p>The SA also recommended that, should the two additional sites be allocated in the Travellers' Sites DPD, associated site-specific policies are prepared and included in the DPD, in line with the approach taken for the other five site allocations. The SA provides recommendations for the criteria that should be included in the site-specific policies which should avoid adverse impacts or enhance positive effects.</p> <p>Only one of these sites was included as a site allocation policy in the adopted plan. The Inspector considered the findings of the SA and made his recommendations regarding the additional policy accordingly.</p>

<p>Main Modification Consultation</p>		<p>The SA of the Herefordshire Travellers' Sites DPD Main Modifications has concluded that all of the changes to the SA findings for previously assessed policies resulted in positive effects for the various SA objectives. None of the Main Modifications would result in any new significant negative or positive effects for the SA objectives. Therefore, no changes to the assessment of cumulative, synergistic or secondary effects presented in the 2017 November SA Report were identified. There was also no change to the Monitoring Framework presented in the 2017 November SA Report.</p>
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4.0 How opinions of consultation bodies and the public have been taken into account.

4.1 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Reports are robust and have due regard for all appropriate information that will support the plan in making a contribution to sustainable development. At each stage of the Local Plan’s development, an SA Report was published alongside the Local Plan for consultation with the public and the consultation bodies specifically relating to the SEA Directive i.e. Historic England (formerly English Heritage), the Environment Agency and Natural England. At pre-submission stage a non-technical summary for the SA report was also published for ease of reference. Table 3 sets out the responses received at the scoping, issues and options and preferred options consultations. There were no specific comments made on the SA at submission stages, Additional Sites Consultation and Main Modifications. However the Inspector considered all of these reports as part of the examination process.

Table 3: Comments received to SA reports

Consultee	Comment	Response
Scoping consultation comments		
Shropshire Council	<p>Are there other Documents specifically relevant to the Travellers’ Sites Document that we should take into account?</p> <p>As you are aware Shropshire Council is currently completing its GTAA which will provide an update for Shropshire on the Gypsy and Traveller Accommodation Assessment (2008 GTAA) for Shropshire, Herefordshire, Telford and Wrekin and Powys. This should be referenced when it is published.</p>	Noted. The updated information from the GTAA will be taken into account during later stages of the SA once it is available.
Shropshire Council	<p>Can you suggest (or provide) any other information/have we identified the main sustainability issues?</p> <p>The high degree of mobility of this population is a significant characteristic which may merit highlighting in relation to provision. Similarly migration patterns and household formation are heavily influenced by family links and traditions e.g. a tendency for women to move away on marriage and men to stay in close proximity to their families.</p> <p>Feedback on our draft GTAA also highlighted greater social barriers to the provision of accommodation including local opposition, land ownership and lack of political support. Survey responses indicated significant use of health services (in the last year 98% of those surveyed had accessed a GP, 50% a dentist, 33% A & E). Therefore access to these</p>	Noted. This information has been added to the revised baseline information in Chapter 3 of this report.

Consultee	Comment	Response
	services may also be a significant issue within Herefordshire.	
English Heritage	<p>Cultural Heritage</p> <p>We note in the key sustainability issues table on pages 12 and 13 there is no mention of the historic environment as a key sustainability issue. We would request that a sustainability issue addressing the historic environment is included to ensure that it is appropriately assessed.</p>	Noted. An additional key sustainability issue relating to the historic environment has been added to the revised set in Chapter 3 of this report.
English Heritage	We support the inclusion of SA objective 20 that relates to the historic environment and would encourage the inclusion of a broad range of heritage assets rather than only the ones currently listed, a recognition of the value of the natural landscape within the historic environment as well as the built environment and the importance of conserving and enhancing the significance of heritage assets	Noted. The assessment of the Plan against SA objective 20 considers all aspects of the historic environment. While Conservation Areas, Listed Buildings and archaeological remains are referred to specifically, the SA objective also refers to ‘other features and areas of historical heritage and cultural value’.
English Heritage	We would welcome including monitoring indicators within the assessment that fully reflect the historic environment.	Noted. Proposals for monitoring the likely significant effects of the Travellers’ Sites Document will be considered at a later stage of the SA process, as described in the Scoping Report.
English Heritage	<p>Plans and Programmes</p> <p>We would support the inclusion of Plans and Programmes that reflect the historic environment for example any evidence base documents used to inform the plan making process such as Historic Landscape Characterisation, Historic Environment SPDs, information from the Historic Environment Record (HER) etc. We would encourage that you liaise with local conservation and archaeology staff in your area who would be best placed to advise on the specific plans and programmes that would merit inclusion.</p>	Noted. The policy review set out in the Scoping Report (and Chapter 3 of this report) describes plans, policies and programmes of specific reference to the Traveller community only – the full review, which considers a range of plans, policies and programmes associated with the historic environment, can be found in the SA report for the Local Plan-Core Strategy, as described in the Scoping Report.
English Heritage	<p>English Heritage Guidance</p> <p>English Heritage has produced guidance on Strategic Environmental Assessment and the Historic Environment of which I enclose the link below for your information: http://www.english-heritage.org.uk/publications/strategic-</p>	Noted. This guidance will be referred to as relevant throughout the SA process (e.g. once potential sites for the Travellers’ Sites Document have been identified).

Consultee	Comment	Response
	environ-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf	
Natural England	Natural England is generally satisfied that the proposed scope of the Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Travellers' Sites document is appropriate.	Noted, no action required.
Natural England	Are there other Documents specifically relevant to the Travellers' Sites Document that we should take into account? Natural England has no recommendations specifically relevant to the Travellers' Sites Document. However, we would suggest that due to the water quality issues for the River Wye Special Area of Conservation (SAC), reference could be made to the Conservation of Habitats and Species Regulations 2010. We note the proposal to undertake a separate Habitat Regulations Assessment of the Travellers' Sites Document.	Noted. Reference to the Habitats and Species Regulations has been added to the updated version of the policy review in Chapter 3 of this report.
Natural England	Have we identified the main sustainability issues? We welcome the inclusion of water quality and biodiversity and stewardship in table 4.1: Key sustainability issues. We welcome the inclusion of biodiversity and the landscape in table 5.1 SA Framework.	Noted, no action required.
Natural England	Do you think the appraisal methodology (e.g. screening out 'unreasonable' sites) and assessment method is clear and workable? Yes.	Noted, no action required.
Issues and Options comments		
English Heritage	We support the reference to cultural heritage within the key sustainability issues on page 21, arising from our previous comments. It is important that any effects to the historic environment are assessed and an impact of the harm is undertaken, as referred to in our comments above.	Noted.
English Heritage	The assessments undertaken in tables 4.1, 4.2, 4.3 are insufficient and often cite '?' effects for the historic environment. It is unclear how table 4.1, option 1 and 3 could be positive for the historic environment with the limited information available. A simplistic assessment of the size of a site on the bearing of a heritage asset is not a sufficient approach as it will depend on the heritage assets, their significance including setting and the relationship with the proposed	The uncertainty previously cited was due to the broad policy options which were being assessed. Specific site options have now been appraised so it has been possible to assess the effects on the historical environment in more detail, see Chapters 5 and 6 and Appendix 4 of this SA Report.

Consultee	Comment	Response
	allocation. A heritage impact assessment would need to be undertaken	
English Heritage	Paragraph 4.25 we would support the approach that where mitigation measures are identified that these are incorporated into the policy wording in the Plan.	Noted. Further recommendations regarding mitigation have been made in Chapter 6.
English Heritage	Appendix 2 Detailed Matrices offers some further information on the reasoning behind the assessment in tables 4.1, 4.2 and 4.3. We would support additional information at the next stages of the SEA process. Many of the judgements relate to new development being built to higher standards but it is not clear what this would relate to or how this would have a positive effect on the historic environment.	
Natural England	Natural England is pleased to see the River Wye Special Area of Conservation (SAC) identified as a key sustainability issue in the Sustainability Appraisal (SA). In the absence of an adopted core strategy we would, however, appreciate a more detailed explanation of the issues identified at this site (i.e. the elevated phosphate levels) and also a direct reference to the counties Nutrient Management Plan when discussing appropriate mitigation for development.	The Core Strategy has since been adopted and the Nutrient Management Plan is referred to.
Preferred options consultation		
Historic England	Recommends that detailed assessments of the likely impacts on the historic environment including both designated and undesignated assets are undertaken for the proposed site allocations.	Herefordshire Council conducted an assessment of the likely effects on the historic environment and concluded that the development of these sites will not have a detrimental effect on the historic environment as the sites are not visible from the nearby heritage assets and therefore neither the assets nor their settings will be affected.
Historic England	Recommend that Policy TS 1: Residential Traveller Pitches and Sites is amended to read "Good quality of design to respect the setting of the site, including any potential impacts on designated and undesignated heritage assets".	This amendment has not been incorporated into the Pre-Submission Publication version (September 2017), but the Council sought cabinet members approval to include this prior to pre-submission. It is included as a recommendation in this SA Report.

Consultee	Comment	Response
Public	Objectives 1,4 and 16 need revision to fully reflect the impacts highlighted	SA objectives are derived from the SA of the adopted Core Strategy. Using the same objectives ensures consistency and allows comparison of sustainability issues between the different documents that form the Local Plan.
Public	The Sustainability Appraisal has most of the appraisals of the objectives set out as being able to have a score, because they cannot be measured without assumptions. If the council has no idea of what the provision is likely to be, how can it commit local public spending to this, comparing it to the known issues in other areas in public spending which are already an issue and are measurable	Noted. The use of assumptions for site assessment ensures consistency of SA scores. The Pre-Submission Publication DPD has identified that it will allocate five Traveller sites including one Temporary Stopping Place delivering a total of 14 pitches. This is above the requirement identified in the GTAA 2017 Update
Consultee	Comment	Response
Public	Agricultural land change of use will have a negative impact.	Noted.
Public	Note the SA Report identifies that all 8 of the shortlisted sites will have some kind of impact on nearby heritage assets. All suggested sites will need detailed assessment as recommended.	Noted. Herefordshire Council conducted an assessment of the likely effects on the historic environment and concluded that the development of these sites will not have a detrimental effect on the historic environment as the sites are not visible from the nearby heritage assets and therefore neither the assets nor their settings will be affected. Any potential effects could be mitigated if, as Historic England recommended during the Preferred Options consultation stage, Policy TS 1: Residential Traveller Pitches and Sites is amended to refer to designing layouts that respect the setting of the site, including any potential impacts on designated and undesignated heritage assets.

5.0 The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;

- 5.1 The SA process included consideration of a range of reasonable alternatives including the approach to identifying sites as well as the consideration of a larger number of sites than were included in the adopted plan. The following paragraphs summarise this process for each stage of the plan making process in turn:
- 5.2 Issues and Options (August 2014): An issues and options Paper was published for consultation in August 2014. This document focused on how any need for Traveller accommodation in Herefordshire should be met, by identifying the possible ways in which sites for permanent and transit pitches and plots for Travelling Showpeople could come forward. It looked at the best approach or “options” for how sites and broad locations of search can be identified to meet existing and any future need. However it did not look at individual sites. The options for identifying new pitches included to approach for site allocation, the approach to size of new or extended sites and the approach to the provision of transit temporary accommodation. These options 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. Preferred Options stage
- 5.3 Preferred Options Stage (July 2016): From December 2015 to February 2016, the Council undertook a Call for Sites exercise. A set of 15 reasonable alternative Traveller site options were subsequently identified and subject to SA by LUC on behalf of the Council (the findings are set out in Chapter 5 of the Preferred Options stage SA Report with the detailed appraisal matrices for the options presented in Appendix 4 of that report).
- 5.4 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 preferred options SA Report with the detailed SA matrices presented in Appendix 4 of that report.
- 5.5 Pre-Submission Publication stage November 2017: 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 proposed 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 Preferred Options SA Report with the detailed SA matrices presented in Appendix 5 and Appendix 6 of that report. The November 2017 SA Report which accompanied the examined DPD describes how reasonable alternatives were considered and selected as part of the SA and plan-making processes, as required by the SEA Regulations.
- 5.6 Examination: Given that reasonable alternatives were appraised up to the submission of the DPD and also during the examination, and that preparation of the proposed Main Modifications was led by the Inspector with no further alternatives requiring SA being identified, the Main Modifications SA addendum did not include an appraisal of any alternatives.
- 5.7 Adoption October 2019: The Inspector’s report published on 24 June 2019 concludes that with the recommended main modifications set out in the Appendix the Herefordshire Travellers’ Sites Development Plan Document satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy

Framework. In the assessment of legal compliance of the DPD, the Inspector stated that the Sustainability Assessment process was adequate.

6.0 How will the environmental and sustainability effects of the Local Plan – Core Strategy be monitored?

6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that the significant environmental effects of implementing a plan which has been subject to sustainability appraisal should be monitored. The 2017 pre-submission sustainability appraisal proposed a monitoring framework and a number of suggested indicators for monitoring the potential significant effects of implementing the DPD. It was also recommended in that SA that the Council continues the dialogue with statutory environmental consultees and other stakeholders to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable. The SA of the DPD Main Modifications concluded that all of the changes to the SA findings for previously assessed policies result in positive effects for the various SA objectives. None of the Main Modifications would result in any new significant negative or positive effects for the SA objectives. Therefore there no changes were made to the Monitoring Framework presented in the 2017 November SA Report at that stage and it is shown in Table 4 below. These indicators will be used to assess the impact of the policies and proposals of the DPD and will be reported in the Authority Monitoring Reports.

Table 4 Proposed Monitoring Framework:

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	<p>Pollution monitoring, event identification, mitigation and, where necessary, legal recourse lie outside of planning control.</p> <p>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).</p>
Cultural heritage	<p>Condition monitoring is not routinely undertaken for either designated or non-designated heritage assets.</p> <p>Avoidance of impacts, in line with recommended policy changes, should be prioritised – thereby removing the potential for significant effects.</p>