

Three Rivers District Council

Three Rivers Core Strategy

Sustainability Appraisal/ Environmental Report

Addendum to the February 2011 Submission

Version

July 2011

**Halcrow Group Limited *in* association with
Centre for Sustainability at TRL**

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1.0 Introduction

Three Rivers District Council (TRDC) produced a Core Strategy DPD and an accompanying Sustainability Appraisal/ Environmental Report Submission Version in February 2011 (SA Report), and submitted it for examination by the Planning Inspectorate.

Following examination hearings on Core Strategy Core Policy “CP5: Gypsy and Travellers provision”, TRDC have reverted back to the policy wording contained in Policy CP5 of the June 2010 Core Strategy version, with few amendments. Based on this revision, parts of the SA Report, February 2011 version have been updated to reflect the policy change. This document refers to the proposed policy and SA alterations, and must be read in conjunction with the SA/ Environmental Report, February 2011 for a comprehensive understanding of the sustainability appraisal of the submitted Core Strategy.

No comments were received on the submission SA and therefore no alterations to the SA, other than those in this document, are proposed.

Changes proposed to the SA Report are shown in the following ways:

- Where deletions of the existing text have been made, the text has been crossed out, for example “~~This text has been deleted~~”, and
- Where text has been inserted it is underlined, for example “This text has been inserted”.

2.0 Core Strategy Policy CP5: Gypsies and Travellers

For purposes of clarity, the Core Strategy February 2011 version of this policy, with the July 2011 proposed changes is reiterated in the paragraph below.

PROVIDING FOR THE NEEDS OF GYPSY AND TRAVELLER ACCOMMODATION AND TRAVELLING SHOWPEOPLE

- 5.41 Gypsy and Travellers and Travelling Showpeople have particular accommodation needs that require additional consideration. To ensure that members of these communities are able to access decent and appropriate housing, the Council must make provision for accommodation to meet identified needs.
- 5.42 ~~Following the revocation of Regional Spatial Strategies, the Council is able to consider available evidence in order to set local targets for the provision of pitches for Gypsies and Travellers. The Council has carefully considered the available evidence for the level of need that exists for pitches for Gypsies and Travellers. Council considers that it is appropriate for Three Rivers to provide 7 pitches between 2006 and 2021. The Regional Strategy sets out a target for Three Rivers to provide 15 additional pitches for Gypsies and Travellers by 2011 and a~~

further 13 pitches by 2021. Since 2006, 15 pitches for Gypsies and Travellers have been provided through the grant of planning permission. The Council will allocate sites to meet the regional target in the Gypsy and Traveller DPD in accordance with Policy CP5. The Council acknowledges a need for 10 transit pitches in south and west Hertfordshire to complement the existing South Mimms site by 2011 and will work with neighbouring authorities to identify the most appropriate location(s) for these pitches. There is not considered to be a need for any additional plots for travelling showpeople in the District. These targets will be kept under review.

5.43 A pitch is an area of land where a Gypsy or Traveller household can reside. It typically consists of a building, a parking space and one or more caravans. The average number of caravans per pitch is currently estimated as 1.7. However this may vary depending on the size of individual families, their particular needs and the extent to which facilities are shared. A site is an area of land comprising multiple pitches and where appropriate, communal facilities.

5.44 Any applications for pitches will be assessed on a case by case basis against the policies of the Core Strategy and other relevant guidance.

5.45 In considering the circumstances of the applicant and their need for pitches on the application site, factors which may be taken into account include (but are not limited to) family and cultural ties, employment, health and education requirements.

~~5.44 ‘An Assessment of the Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire’, (2005) (known as the CURS Report) was commissioned by Dacorum, Hertsmere, Watford, Three Rivers and St Albans councils and Hertfordshire County Council. The report concluded that within South and West Hertfordshire there was the need for about 125 additional pitches over the next 5 years (i.e. to 2010). This comprised about 90 residential pitches and 35 pitches arising from household growth. In addition a need for 30 additional transit plots was identified. The Assessment provides a useful indication of need in the area, although subsequent analysis indicates that need was over-estimated.~~

~~5.45 Following on from the Assessment of the Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire report, the Scott Wilson Report was commissioned by the south and west Hertfordshire authorities to help identify potential Gypsy and Traveller sites in the study area. This consultant report (published in March 2007) identifies 16 sites in Three Rivers as potential sites. However, the findings of the report were not supported by Three Rivers District Council as the majority of the identified sites are located deep within the Green Belt and are remote from services and infrastructure.~~

~~5.46 Since 2006, 13 pitches have been provided through the grant of planning permission. There is therefore no need to allocate further pitches in the District to meet the Three Rivers target.~~

CP5

Gypsy and Traveller Provision

When allocating sites or considering planning applications for sites for Gypsies and Travellers or Travelling Showpeople ~~not identified within the Site Allocations document~~, a criteria based approach will be used. ~~Sites would need to:~~ The following criteria will be taken into account:

- a) Avoid areas at risk from flooding
- b) Avoid causing an adverse impact on areas of recognised wildlife, heritage or landscape importance, and on the openness of the Green Belt
- c) Be in or near existing settlements with access by foot and/ or public transport to local services, including shops, schools and healthcare
- d) Be well located to the highway network, with safe and convenient vehicular and pedestrian access to the site
- e) Provide adequate on-site facilities for parking, storage, play and residential amenity
- f) Provide adequate levels of privacy and residential amenities for occupiers and not be detrimental to the amenities of adjacent occupiers
- g) The circumstances of the applicant and their need for pitches on the application site ~~Provide clear evidence of the need for additional pitches in the area.~~

3.0 Amendment to SA sections

Based on the revision to CP5, this section discusses amendment to relevant sections of the sustainability assessment of the February 2011 SA Report. The amendments relates to revision of the assessment against the SA objective 14, Equity & Social Exclusion, from a mild positive to a significant positive effect.

3.1 *Non-technical summary and the Assessment Summary matrix*

In order to reflect the revised assessment, the following text should be added to the section 'Submission Version assessment results', under paragraph 4 of the Non-technical summary SA Report, February 2011:

- CP5 will have a significant positive effect against the SA Objective 14: Equity and Social exclusion.

Replace Tables 0.1 and 7.1 with the following table:

Table 0.1 and Table 7.1 Assessment Summary Table- Submission document

policies

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Soils	SA5 CO ₂	SA6 Climate change adaptation	SA7 Air quality	SA8 PDL usage	SA9 Resource efficiency	SA10 Cultural heritage	SA11 Landscape	SA12 Health	SA13 Sustainable development pattern& Accessibility	SA14 Social equity	SA15 Good quality house	SA16 Community participation	SA17 Crime prevention	SA18 Sustainable growth	SA19 Town Centre revitalisation
CS Policy																			
Vision	+	+	+	+	++	+	++	+	++	0	+	++	++	+	0	0	+	+	+
Spatial strategy	?	?	+	+	+/-	+	+/-	++	+	?	?	+/-	+	0	0	0	0	+	+
PSP1	+	+	+	+	+	+	+	++	+	++	+	+	++	++	+	?	?	+	++
PSP2	+	+	+	+	+	+	+	++	+	++	+	++	++	+	+	?	?	+	+
PSP3	+	+	+	+	+	+	+	++	+	++	+	++	++	++	+	?	+	+	+
PSP4	+	+	+	+	?	+	?	?	?	+	+	+	?	+	+	?	?	+	+
CP1	++	+	++	++	+	+	+	++	++	+	++	++	+	++	+	?	+	++	++
CP2	?	?	0	?	+	+	-	+	?	?	+	?	++	?	0	?	0	+	+
CP3	?	0	0	+	+	+	0	?	+	+	+	+	++	+	+	+	+	+	+
CP4	0	0	0	0	0	+	0	+	+	?	0	0	?	++	+	+	?	?	+
CP5	+	?	+	0	0	+	0	?	?	0	+	+	++	++	0	+	+	+	+
CP6	0	0	+	+	0	+	-	+	+	0	+	?	+	+	+	+	+	++	+
CP7	0	0	+	0	+	?	+	?	?	+	+	+	+	0	0	0	+	+	+
CP8	?	?	+	0	?	?	0	0	0	+	?	+	++	0	0	?	0	+	0
CP9	++	+	+	+	+	+	+	+	0	+	+	+	0	+	0	0	0	+	?
CP10	+	0	?	0	+	0	+	0	0	0	?	+	++	+	0	+	0	+	+
CP11	?	0	0	?	0	0	0	+	?	0	?	+	?	0	0	0	0	?	0
CP12	+	0	+	0	+	+	0	0	++	+	+	0	0	0	+	0	+	+	0
CP13	+	+	+	+	+	+	+	0	+	+	+	+	+	?	0	0	+	+	+

CP1 Sustainable development
CP5 Gypsy & traveller provision

CP2 Housing supply
CP6 Employment & economic development

CP3 Housing mix & density
CP7 Town centres

CP4 Affordable housing
CP8 Infrastructure & planning

CP9 Green infrastructure
CP13 Monitoring & delivery

CP10 Transport

CP11 Green belt

CP12 Design of development

Symbol	Description
++	Very sustainable - Option is likely to contribute significantly to the SA/SEA objective
+	Sustainable - Option is likely to contribute in some way to the SA/SEA objective
0	Neutral – Option is unlikely to impact on the SA/SEA objective
?	Uncertain – It is uncertain how or if the Option impacts on the SA/SEA objective
-	Unsustainable – Option is likely to have minor adverse impacts on the SA/SEA objective
--	Very unsustainable – Option is likely to have significant adverse impacts on the SA/SEA objective

3.2 Report section 7.4.11 of the SA Report, February 2011

Chapter 7 of the SA Report discusses policy assessment results, and section 7.4.11 relates to CP5 Gypsy and Traveller Provision. The following paragraph replaces this section:

The policy is likely to take into consideration the social needs such as health, education and cultural ties of the Gypsy site applicant, thus exhibiting an

inclusive approach to the wider population and supportive of travellers. For this reason, significant positive effects are predicted against the Sustainable development patterns & accessibility and Equity & social exclusion SA objectives.

Barring few environmental objectives, CP5 will have a minor positive effect on a number of sustainability objectives, particularly against sustainable growth ~~social inclusion~~ and on economic growth. The policy is sensitive to gypsy settlements, particularly in terms of ensuring accessibility and spaces for their provision. The policy aims to protect the openness of the Green Belt and areas of wildlife and landscape importance. It therefore scores well under the biodiversity and landscape objectives respectively. However the location of 10 Transit pitches, to be identified jointly with neighbouring local authorities is unknown. It is assumed that these pitches will also be assessed based on the criteria set out in the policy, and that protection of green belts will remain a priority area. The policy indicates, areas of flood risk will also be avoided, which gives the policy a positive score for the flood risk and climate change proof objectives. Locating gypsies and travellers in areas within or near to existing settlements and providing a wide range of services is likely to benefit the local economy and to contribute to revitalising town centres.

The policy ~~also scores well in terms of its contribution to achieving social objectives such as equity and inclusivity.~~ It is likely to encourage a participatory society.

The likely effect of CP5 on water resources, use of brown field land and on resource efficiency cannot be determined as the policy wording is not explicit about its approach to these issues although CP1 advocates use of PDL.

Mitigation measures/ Recommendations for CP5:

- Consider making reference to promoting use of PDL
- Ensure policy measures to prevent potential water contamination, for example from run-off from the settlements

3.3 Detailed assessment matrix

Appendix 6 of the SA Report February 2011 version includes detailed assessments relating to all Core Strategy Policies. The following table replaces the assessment against Policy CP5 contained in the Appendix.

CP5 Preferred Policy Approach: Gypsy and Traveller Provision

SA Objective	Significan	Timescale	Likelihood	Scale	Permanen	Commentary	Recommended mitigation (including recommendations for lower level Local Development Documents)
Biodiversity	+	M T	M	L	T	There should be positive impacts on biodiversity by choosing sites that are not recognised for their wildlife value and also indirect positive impacts <u>to aquatic habitats by</u> avoiding areas at risk from flooding, e.g. <u>through by</u> reducing water-borne pollution.	
Water quality	?	M T	M	L	T	Effects on water quality are uncertain.	Ensure <u>explicit</u> measures <u>are</u> in place to tackle run-off/pollution issues <u>through lower level documents</u> .
Flood risk	+	M T	M	L	T	Avoiding areas at risk from flooding will directly help progress this SA objective.	
Soils	0	0	0	0	0	No impacts on this SA objective envisaged as long as the occupants are not located on land with potential contamination.	
CO ₂ emissions	0	0	0	0	0	No direct relation to this SA objective.	
'Climate change proof'	+	M T	M	L	T	Avoiding areas at risk from flooding will directly help progress this SA objective.	
Air quality	0	0	0	0	0	No direct relation to this SA objective.	
Use of brownfield land	?	M T	M	L	P	Use of PDL, wherever practicable, is not specified in policy wording, hence the uncertain score for this SA objective.	
Resource efficiency	?	M T	M	L	T	Possible resource efficient options such as use of PDL, density of settlements, use of local resources, or limited impact on non-renewable resources are not discussed in policy wording.	

SA Objective	Significan	Timescale	Likelihood	Scale	Permanen	Commentary	Recommended mitigation (including recommendations for lower level Local Development Documents)
Historic & cultural assets	0	0	0	0	0	No direct relation to this SA objective.	
Landscape and townscape	+	M T	M	L	T	The openness of the Green Belt and areas of landscape importance will be protected by this policy.	
Health	+	M T	M	L	T	Providing good access to health services and play areas will benefit the health of the gypsy and traveller population.	
Sustainable development patterns & accessibility	+	M T	M	L	T	Providing areas that have good access to services and the highway network should progress this SA objective. Also protecting Green Belt, the landscape and avoiding areas of flood risk should contribute positively to a sustainable development.	
Equity & social exclusion	+	M T	M	L	T	<u>Education, health and cultural aspects of the site applicant will influence decision on the pitch allocation, thus the policy is likely to take an equitable and inclusive approach to considering the travellers' and residents' comfort.</u>	
Good quality housing	0	0	0	0	0	No direct relation to this SA objective.	
Community identity & participation	+	M T	M	L	T	This policy allows gypsies and travellers to participate in society to a greater extent.	
Crime	+	M T	M	L	T	An inclusive and participatory society should help reduce crime levels. Synergistic positive effect with CP12. Should also reduce unauthorised encampments and associated problems.	
Sustainable prosperity & growth	+	M T	M	L	T	Providing sites in or near existing settlements with access to local services, including shops, schools and healthcare should contribute to a sustainable growth.	
Revitalise town centres	+	M T	M	L	T	Providing sites in or near existing settlements may contribute to revitalising town centres.	

