

Three Rivers District Council

Gypsy, Traveller and Travelling Showpeople
LDD

(Preferred Options)

Draft for Consultation

Sustainability Appraisal Report Addendum

September 2014

Halcrow Group Limited, a CH2MHill Company,
in association with
Centre for Sustainability at TRL Limited

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Contents Amendment Record

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1. Introduction

1.1 Background

Three Rivers District Council (TRDC) has produced a Core Strategy, which was adopted in October 2011. This provides the over-arching strategy and policies and the long-term vision for the District. Further lower level Local Development Documents (LDD), such as the Gypsy, Traveller and Travelling Showpeople LDD (GTTS LDD) will support the Core Strategy and form a material consideration to inform decisions on future planning applications.

1.1.1 Purpose of this Sustainability Report

A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

A Sustainability Appraisal was undertaken for the Core Strategy, the Development Management Policies LDD and the Site Allocations LDD. The Sustainability Appraisal for the GTTS LDD therefore adds to these other appraisals. It does not however duplicate work already undertaken, but has been informed by the evidence gathering and findings of the other Sustainability Appraisals, in particular the SA Report for the Core Strategy (February 2011) and the SA Report Addendum (July 2011) which provide the evidence base for the SA as well as the assessments of the Core Strategy policy for Gypsy and Traveller Provision (Policy CP5)¹.

An SA Report was produced alongside the consultation on the GTTS LDD in January 2014 to document the findings of the sustainability appraisal on the GTTS LDD and provide an assessment of the contribution of the LDD towards sustainable development.

This SA Report Addendum has been prepared to document the findings of the sustainability appraisal of the updates to the GTTS LDD that are being proposed during this latest round of consultation. The report does not repeat information provided in the SA Report (January 2014) and should therefore be read alongside that earlier report.

1.2 Gypsy, Traveller and Travelling Showpeople LDD

The Three Rivers Core Strategy sets out the vision and objectives for the spatial development of the area. Policy CP5 of the Core Strategy sets the criteria against

¹ The July 2011 SA Report provides the assessment for the final version of CP5 that was amended following the examination hearings on the Core Strategy.

which planning applications for Gypsies, Travellers and Travelling Showpeople will be assessed.

The role of the Gypsy Traveller and Travelling Showpeople LDD is to identify sites to meet the accommodation needs of Travellers in the District in accordance with national policy.

The Consultation Draft GTTS LDD published for consultation in February 2013 included one policy (Policy GT1) that provided safeguarding for allocated traveller sites and proposed the allocation of one new site, (GT(1): Land East of Tolpits Lane, Rickmansworth).

Following the consultation in spring 2013 the site at Tolpits Lane was ruled out from allocation as a traveller site, and a new Consultation Draft LDD was developed for consultation in January 2014. That draft proposed the allocation of two sites which currently have temporary planning permission (Policy GT1) and provided safeguarding for allocated traveller sites Policy GT2).

The new draft of the GTTS LDD which will be consulted on in October 2014 retains these policies, but with some changes in detail being made to Policy GT2, as shown below using strikethrough text (deleted wording) and bold italic text (new wording).

NB: Policy GT1 remains unchanged, but is shown below for purposes of completeness as the sites referenced in the policy will be the subject of new proposals relating to Green Belt designation status (see below).

POLICY GT1: TRAVELLER SITE ALLOCATIONS
<p>The following sites have been identified for traveller site use:</p> <ol style="list-style-type: none">1. Rear of 59 Toms Lane, Kings Langley2. Land between Langleybury lane and Old House Lane, Langleybury <p>These sites are considered to be suitable, available and achievable for traveller use. The development of the sites will be subject to other relevant policies in the adopted development Plan and national planning policy.</p> <p>These sites shall be occupied only by those persons who meet the definition of 'gypsies and travellers' in Annex 1: Glossary of the DCLG document 'Planning policy for traveller sites'.</p>

POLICY GT2: SAFEGUARDING EXISTING AUTHORISED SITES

Existing traveller sites will be safeguarded for traveller use. These sites will continue to be safeguarded for as long as the need exists for traveller accommodations within the District:

1. The Oaklands, Bedmond Road, Bedmond
2. Fir Trees, Dawes Lane, Sarratt
3. Land Adjacent to 321B Uxbridge Road, Mill End, Rickmansworth
4. Rear of 317-319 Uxbridge Road, Mill End, Rickmansworth
5. Rear of 321 Uxbridge Road, Mill End, Rickmansworth

Any new traveller sites granted planning permission and implemented shall also be safeguarded under provisions of this policy as long as the need exists ~~for traveller accommodation within the District~~ **as identified in the Council's latest, agreed Gypsy and Traveller Accommodation Needs Assessment**.

In addition to the change to Policy GT2, the revised GTTS LDD makes proposals in relation to the following:

- Removing the Green Belt designation from the seven sites listed in Policy GT1 and Policy GT2;
- Specifying that applications for Gypsy and Traveller uses on sites not identified in the LDD (i.e. windfall sites) will be determined in accordance with Policy CP5 of the Council's Core Strategy.

2. Methodology

2.1 Introduction

The methodology used to undertake the assessment of the LDD is consistent with that used for the Core Strategy, the Development Management Policies LDD and the Site Allocations DPD. The methodology is detailed in Section 7 of the Core Strategy SA Report (February 2011) and summarised below.

2.2 Assessment methodology

The assessment involves the prediction of the effects of each LDD element against the SA Objectives that were developed for the Core Strategy SA and amended to make them suitable for the assessment of site allocations. The SA Objectives are summarised below (Table 1), with the full SA Framework being provided in Appendix 1 of the SA Report (January 2014).

The assessment is expressed using the significance criteria outlined in Appendix 1 of this Addendum.

Table 1: Sustainability Appraisal Objectives

Objective
1. To protect, maintain and enhance biodiversity and geodiversity at all levels, including the maintenance and enhancement of Biodiversity Action Plan habitats and species in line with local targets
2. To protect, maintain and enhance water resources (including water quality and quantity) while taking into account the impacts of climate change
3. Ensure that new developments avoid areas which are at risk from flooding and natural flood storage areas
4. Minimise development of land with high quality soils and minimise the degradation/loss of soils due to new developments
5. Reduce the impacts of climate change, with a particular focus on reducing the consumption of fossil fuels and levels of CO ₂
6. Ensure that developments are capable of withstanding the effects of climate change (adaptation to climate change)
7. Achieve good air quality, especially in urban areas
8. Maximise the use of previously developed land and buildings, and the efficient use of land
9. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible
10. To identify, maintain and enhance the historic environment and cultural assets
11. To conserve and enhance landscape and townscape character and encourage local distinctiveness
12. To encourage healthier lifestyles and reduce adverse health impacts of new developments
13. To deliver more sustainable patterns of location of development
14. Promote equity & address social exclusion by closing the gap between the poorest communities and the rest
15. Ensure that everyone has access to good quality housing that meets their needs
16. Enhance community identity and participation
17. Reduce both crime and fear of crime
18. Achieve sustainable levels of prosperity and economic growth
19. Achieve a more equitable sharing of the benefits of prosperity across all sectors of society and fairer access to services, focusing on deprived areas in the region
20. Revitalise town centres to promote a return to sustainable urban living

3. Assessment Findings

The proposals to amend the wording of Policy GT2; to remove the seven sites listed in Policies GT1 and GT2 from the Green Belt; and the additional text relating to windfall sites have all been assessed against the sustainability appraisal objectives. The assessments are documented in Appendix 1. The following subsections provide a summary of the assessment findings.

3.1 *Policy GT2: Safeguarding Existing Authorised Sites*

The assessment did not identify any effects against the SA Objectives that would result from this change to the policy wording. Whilst the amendment to the policy provides clarity in relation to how the need for traveller sites will be determined when considering whether or not new traveller sites should be safeguarded, it does not in any way change the requirements of the policy, or the current situation,

which already uses the Gypsy and Traveller Accommodation Needs Assessment when considering such matters.

3.2 *Removal of sites from the Green Belt*

The assessment did not identify any effects against the SA Objectives that would result from the proposal to remove from the Green Belt the seven sites listed in policies GT1 and GT2. The effects of allocating new sites and safeguarding both the existing and the new sites have already been considered in the previous SA Report. The removal of the Green Belt designation for these sites is simply a change in a planning designation in that part of the District and does not have any predicted effects against the SA Objectives.

3.3 *Applications on windfall sites*

The assessment did not identify any effects against the SA Objectives that would result from specifying that applications for Gypsy and Traveller uses on sites not identified in the LDD (i.e. windfall sites) will be determined in accordance with Policy CP5 of the Council's Core Strategy. This requirement is reiterating existing Core Strategy policy for purposes of completeness within the LDD and will therefore not result in any new effects against the SA Objectives.

4. Habitats Regulations Assessment

As for all other stages during the preparation of the Core Strategy and related LDDs it is necessary to determine whether policies or proposals in the LDD could result in adverse effects on the integrity of European sites of importance for nature conservation.

After considering the proposals being made at this new round of planning, it can be concluded that the GTTS LDD Draft for Consultation (October 2014) does not contain any elements that would have implications for the original findings of the Core Strategy Habitats Regulations Assessment, i.e. that there will be no adverse effect on the integrity of European sites from the implementation of the Core Strategy.

5. Monitoring

It is a requirement of the SEA Regulations that measures are identified for monitoring any significant (adverse and positive) effects of implementing a plan.

Whilst this Sustainability Appraisal has not identified any potential significant effects of implementing the GTTS LDD that require individual monitoring, a monitoring framework that has been put in place for the Core Strategy SA, along with the monitoring framework for the Core Strategy itself (Core Strategy Appendix 7), will pick up any wider (cumulative) issues associated with the implementation of all the Three Rivers LDDs.

Appendix 1: Assessment of Proposed Changes

The assessment is expressed using the significance criteria outlined below.

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

The effects are assessed in terms of geographic and temporal scale, permanence of effect and likelihood of occurrence. The criteria, along with the abbreviations used in the assessment tables, are as follows:

- Geographic scale relates to predicting effects that will have an effect at a national (N), regional (R) or local (L) level.
- Temporal scale relates to effects that are likely to be in the short term (0-10 years) (ST); medium term (10 -20 years) (MT) and long term (over 20 years) (LT).
- Permanence criteria – temporary (T) or permanent (P).
- Likelihood of occurrence – high (H), medium (M) or low (L).

A.1 Policy GT2: Safeguarding Existing Authorised Sites

POLICY GT2: SAFEGUARDING EXISTING AUTHORISED SITES
Existing traveller sites will be safeguarded for traveller use. These sites will continue to be safeguarded for as long as the need exists for traveller accommodations within the District: 1. The Oaklands, Bedmond Road, Bedmond 2. Fir Trees, Dawes Lane, Sarratt 3. Land Adjacent to 321B Uxbridge Road, Mill End, Rickmansworth 4. Rear of 317-319 Uxbridge Road, Mill End, Rickmansworth 5. Rear of 321 Uxbridge Road, Mill End, Rickmansworth Any new traveller sites granted planning permission and implemented shall also be safeguarded under provisions of this policy as long as the need exists for traveller accommodation within the District as identified in the Council's latest, agreed Gypsy and Traveller Accommodation Needs Assessment.

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary
Biodiversity	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to biodiversity.
Water quality	0	-	-	-	-	No direct relation to this SA objective.
Flood risk	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to flood risk.
Soils	0	-	-	-	-	No direct relation to this SA objective.
CO ₂ emissions	0	-	-	-	-	No direct relation to this SA objective.
'Climate change proof'	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to climate change adaptation (flood risk).
Air quality	0	-	-	-	-	No direct relation to this SA objective.
Use of brownfield land	0	-	-	-	-	No direct relation to this SA objective.
Resource efficiency	0	-	-	-	-	No direct relation to this SA objective.
Historic & cultural assets	0	-	-	-	-	No direct relation to this SA objective.
Landscape and townscape	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the openness of the Green Belt and areas of landscape importance.
Health	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to good access to healthcare.
Sustainable development patterns & accessibility	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to access to services.
Equity & social exclusion	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the circumstances and needs of those applying for planning permission for gypsy and traveller sites.
Good quality housing	0	-	-	-	-	No direct relation to this SA objective.
Community identity & participation	0	-	-	-	-	No direct relation to this SA objective.
Crime	0	-	-	-	-	No direct relation to this SA objective.
Sustainable prosperity &	0	-	-	-	-	No direct relation to this SA objective.

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary
growth						
Revitalise town centres	0	-	-	-	-	No direct relation to this SA objective.
<p><u>Summary of Assessment</u></p> <p>The assessment did not identify any effects against the SA Objectives that would result from this change to the policy wording. Whilst the amendment to the policy provides clarity in relation to how the need for traveller sites will be determined when considering whether or not new traveller sites should be safeguarded, it does not in any way change the requirements of the policy, or the current situation, which already uses the Gypsy and Traveller Accommodation Needs Assessment when considering such matters.</p>						

A.3 Removing the Green Belt designation from sites listed in Policy GT1 and Policy GT2

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary
Biodiversity	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to biodiversity.
Water quality	0	-	-	-	-	No direct relation to this SA objective.
Flood risk	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to flood risk.
Soils	0	-	-	-	-	No direct relation to this SA objective.
CO ₂ emissions	0	-	-	-	-	No direct relation to this SA objective.
'Climate change proof'	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to climate change adaptation (flood risk).
Air quality	0	-	-	-	-	No direct relation to this SA objective.
Use of brownfield land	0	-	-	-	-	No direct relation to this SA objective.
Resource efficiency	0	-	-	-	-	No direct relation to this SA objective.
Historic & cultural assets	0	-	-	-	-	No direct relation to this SA objective.
Landscape and townscape	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the openness of the Green Belt and areas of landscape importance.
Health	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to good access to healthcare.
Sustainable development patterns & accessibility	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to access to services.
Equity & social exclusion	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the circumstances and needs of those applying for planning permission for gypsy and traveller sites.
Good quality housing	0	-	-	-	-	No direct relation to this SA objective.
Community identity & participation	0	-	-	-	-	No direct relation to this SA objective.
Crime	0	-	-	-	-	No direct relation to this SA objective.
Sustainable prosperity & growth	0	-	-	-	-	No direct relation to this SA objective.
Revitalise town centres	0	-	-	-	-	No direct relation to this SA objective.
Summary of Assessment						
<p>The assessment did not identify any effects against the SA Objectives that would result from the proposal to remove from the Green Belt the seven sites listed in policies GT1 and GT2. The effects of allocating new sites and safeguarding both the existing and the new sites have already been considered in the previous SA Report. The removal of the Green Belt designation for these sites is simply a change in a planning designation in that part of the District and does not have any predicted effects against the SA Objectives.</p>						

A.5 Applications on windfall sites

SA Objective	Significance	Timescale	Likelihood	Scale	Permanence	Commentary
Biodiversity	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to biodiversity.
Water quality	0	-	-	-	-	No direct relation to this SA objective.
Flood risk	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to flood risk.
Soils	0	-	-	-	-	No direct relation to this SA objective.
CO ₂ emissions	0	-	-	-	-	No direct relation to this SA objective.
'Climate change proof'	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to climate change adaptation (flood risk).
Air quality	0	-	-	-	-	No direct relation to this SA objective.
Use of brownfield land	0	-	-	-	-	No direct relation to this SA objective.
Resource efficiency	0	-	-	-	-	No direct relation to this SA objective.
Historic & cultural assets	0	-	-	-	-	No direct relation to this SA objective.
Landscape and townscape	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the openness of the Green Belt and areas of landscape importance.
Health	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to good access to healthcare.
Sustainable development patterns & accessibility	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to access to services.
Equity & social exclusion	0	-	-	-	-	No direct relation to this SA objective. Core Strategy Policy CP5 provides criteria relating to the circumstances and needs of those applying for planning permission for gypsy and traveller sites.
Good quality housing	0	-	-	-	-	No direct relation to this SA objective.
Community identity & participation	0	-	-	-	-	No direct relation to this SA objective.
Crime	0	-	-	-	-	No direct relation to this SA objective.
Sustainable prosperity & growth	0	-	-	-	-	No direct relation to this SA objective.
Revitalise town centres	0	-	-	-	-	No direct relation to this SA objective.
Summary of Assessment						
<p>The assessment did not identify any effects against the SA Objectives that would result from specifying that applications for Gypsy and Traveller uses on sites not identified in the LDD (i.e. windfall sites) will be determined in accordance with Policy CP5 of the Council's Core Strategy. This requirement is reiterating existing Core Strategy policy for purposes of completeness within the LDD and will therefore not result in any new effects against the SA Objectives.</p>						