



Traveller Sites Allocations Development Plan Document

Consultation Draft Sustainability Appraisal -
Non-Technical Summary

August 2014

What is Sustainability Appraisal?

- 1.1. A Sustainability Appraisal aims to predict and assess the **social, environmental** and **economic** effects that are likely to arise from the adoption of Plans or Programmes, to ensure these contribute to and promote sustainable development.
- 1.2. The Strategic Environmental Assessment aims to predict and assess environmental effects and mitigate negative environmental impacts in accordance with European Law. In this instance the Strategic Environmental Assessment process has been incorporated into the Sustainability Appraisal process. Therefore where the report refers to the Sustainability Appraisal, it can be assumed this also means the Strategic Environmental Assessment.
- 1.3. This Sustainability Appraisal predicts the effects of allocating land for use as permanent Gypsy, Traveller and Travelling Showpeople sites, in order to inform the production of the Traveller Sites Allocations DPD - Consultation Draft. The appraisal process is used to focus attention on the need to consider a range of potential social, economic and environmental effects and to ensure that the final document presents the most sustainable plan, given all alternative realistic options.
- 1.4. The Traveller Sites Allocations DPD will, once adopted, become part of the Local Development Plan, which is used when considering planning applications in Mid Sussex.

How to make comments on this report

- 1.5. The Travellers Sites Allocations DPD – Consultation Draft, along with this accompanying Sustainability Appraisal and the Habitats Regulations Assessment Screening Report, will be made available for public consultation for 6 weeks starting on 8th August until 19th September 2014.
- 1.6. All comments received on these documents will be taken into consideration in preparing the final Traveller Sites Allocations DPD and the Sustainability Appraisal. The final decision on the policies and the sites that will be proposed for allocation when the document is submitted to the Secretary of State will be made by elected Councillors.
- 1.7. All the documents are available on-line at www.midsussex.gov.uk/8686.htm, and along with the response form, are available to view at all Town and Parish Council offices, public libraries and help-points in Mid Sussex and at the District Council offices main reception.
- 1.8. Where possible, responses should be made on-line at www.midsussex.gov.uk/8686.htm otherwise comments can be made on the response form, or by email to LDFconsultation@midsussex.gov.uk or by post to:

Planning Policy and Economic Development
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

- 1.9. As the document seeks to allocate sites, it is also open for those who wish to promote a site for consideration, either now or in the future, to submit their site. Potential sites must be accompanied by a site map clearly showing the boundaries of the site and supported by evidence of the suitability, availability and deliverability¹ of the site for such use. These can be submitted online at www.midsussex.gov.uk/8686.htm or by post or email using the above contact details.
- 1.10. **Mid Sussex District Council will only consider comments by respondents who provide their names and address. Offensive or racist comments will not be accepted and may be reported to the appropriate authorities.**
- 1.11. To find out more about the *Traveller Sites Allocations Document* you can visit our website or call the Planning Policy Team on (01444) 477053. Please contact us if you have particular access needs or require help in completing the comments form.
- 1.12. Further detail of the consultation process is set out in the accompanying *Community Involvement Plan* available at www.midsussex.gov.uk/8686.htm and at all the consultation drop in points

Mid Sussex Planning Policy

- 1.13. Mid Sussex District Council are progressing a 'District Plan' for Mid Sussex for the period to 2031. The District Plan will be the key document in the Development Plan for Mid Sussex. Once adopted it will replace the majority of the policies contained within the Mid Sussex Local Plan (2004).
- 1.14. The District Plan will set out the vision for how Mid Sussex wants to evolve; a delivery strategy for how that will be achieved; and broad guidance on the distribution and quantity of development in the form of 'higher level' strategic policies. It is a way of implementing the Mid Sussex Sustainable Communities Strategy and provides the framework for all subsequent planning documents.
- 1.15. In July 2013, the District Council submitted its District Plan to the Secretary of State. This document was withdrawn and is now being revised following the Inspector's conclusions on the Duty to Co-operate. These revisions and eventual re-submission of the District Plan will not affect the aims of the Traveller Sites Allocations DPD.
- 1.16. The District Plan proposes to include a criteria based policy for Traveller sites, should planning applications for such sites be submitted ahead of (or in addition to) a site allocations document being adopted.

Traveller Sites Allocations DPD

- 1.17. Government guidance "Planning Policy for Traveller Sites" (2012) requires local authorities to establish the accommodation needs of Travellers and to identify a supply of deliverable sites sufficient to provide five years' worth of sites against locally set targets. Local authorities should also identify a further supply of sites or broad locations for growth for

¹ See *Planning policy for traveller sites(DCLG)* - www.gov.uk/government/publications/planning-policy-for-traveller-sites

years 6 to 10 and where possible years 11-15, similar to the National Planning Policy Framework policy requirements for 'bricks and mortar' housing.

1.18. This requirement will be delivered through emerging District Plan policy; and the Traveller Sites Allocations DPD which will identify and allocate suitable sites. It is considered that the approach of allocating specific sites alongside a criteria based policy approach will provide a degree of choice and certainty for the Council and the Gypsy and Traveller and settled communities that isn't currently possible.

Sustainability Appraisal Work Undertaken So Far

1.19. The Scoping Report stage of the Traveller Sites Allocations DPD Sustainability Appraisal is the first stage of assessment. The Scoping Report identified sustainability issues by analysing baseline information collected to build a picture of the challenges facing the district. This led to the formation of a range of sustainability objectives, and indicators to measure them.

Methodology

1.20. The Council collected data about the district as it is today on social, environmental and economic issues. This is known as the 'baseline' and is documented in Section 4 of the main report. This information established the issues and challenges facing the district. A review of all plans, programmes and policies that impact upon the Traveller Sites Allocations DPD was also established.

1.21. From this information, it was possible to identify sustainability objectives that sites options would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts to be measured and monitored in the future.

Current Sustainability Issues

1.22. From the examination of the baseline data, and plans programmes and policies that could influence the Traveller Sites Allocations DPD the main issues and challenges are identified as being:

- A relatively young population, with inadequate access to educational facilities either due to the location of sites or a lack of places. This in turn has a direct effect on educational achievement.
- The Traveller community have more health problems than the settled community – possibly due to the lack of health facilities accessible from sites, or due to inadequacies in living conditions.
- Ease of access to retail, community and leisure facilities is often poor due to the location of sites – particularly those that are unauthorised. There are pockets of deprivation as a whole in Mid Sussex mostly in relation to access to local community services – this can lead to social exclusion.
- Existing sites being inefficient in terms of energy use, particularly caravans. Many sites also do not have access to a mains water supply which has knock-on implications for health.
- Water usage in Mid Sussex is increasing, putting further pressure on water resources.

- Water quality will need to be maintained and enhanced. Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.
- Flood risk is an issue across the district, and it will be extremely important to ensure that development of sites for caravans are not within flood risk zones or areas with a history of flooding due to their vulnerable nature.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the district.
- Relatively low employment rates in the Traveller community; therefore there is a need to encourage employment, particularly by providing enough on-site facilities for self-employment where possible.

1.23. By taking the above issues it was possible to identify sustainability objectives for the district. A total of 13 Sustainability Objectives (and their associated indicators) were established

<p>So 1) To ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets their needs</p> <ul style="list-style-type: none"> • <i>New additional pitches/plots delivered</i>
<p>So 2) To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and increase access to educational facilities</p> <ul style="list-style-type: none"> • <i>Percentage of population of working age qualified to NVQ Level 3 or equivalent</i> • <i>Percentage of adults with poor literacy and numeracy skills</i> • <i>Percentage of new Traveller accommodation within 30 minutes public transport time of a primary and secondary school</i>
<p>So 3) To improve the access to health facilities and reduce inequalities in health</p> <ul style="list-style-type: none"> • <i>Number of applications resulting in new, extended or improved health facilities</i> • <i>Percentage of new Traveller accommodation within 300 metres of accessible green space</i> • <i>Percentage of new Traveller accommodation within 30 minutes public transport time of a GP, hospital or major health centre</i>
<p>So 4) To improve accessibility to retail and community services</p> <ul style="list-style-type: none"> • <i>Distance of Traveller sites from key retail and community services (post office, convenience store, library, place of worship, community hall, etc.)</i>
<p>So 5) To improve accessibility to leisure and recreation facilities</p> <ul style="list-style-type: none"> • <i>Distance of Traveller sites from key leisure and recreation facilities (leisure centre, etc.)</i>
<p>En 6) To protect existing biodiversity, landscape, historical and cultural heritage whilst ensuring that Gypsy and Traveller communities can continue with their own cultural practices.</p> <ul style="list-style-type: none"> • <i>Condition of internationally and nationally important wildlife and geological sites (SSSI, SNCI, SAC, Ramsar)</i> • <i>Number and area of SNCIs and LNRs within the district</i> • <i>Area of ancient woodland within the district</i> • <i>Number of planning applications approved contrary to advice given by Natural England</i>

<p>En 7) To maintain and improve the environmental quality of the district in terms of air pollution, soil (including contaminated land) and water quality</p> <ul style="list-style-type: none"> • <i>Number of Air Quality Management Areas within the district</i> • <i>Number of stretches of watercourse that are rated (as a minimum) “Moderate” under the Water Framework Directive</i> • <i>Incidents of major and significant water pollution within the district</i> • <i>Total area of contaminated land within the district</i> • <i>Total area of Best and Most Versatile Agricultural Land within the district.</i>
<p>En 8) To protect, enhance and make accessible for enjoyment, the district’s countryside</p> <ul style="list-style-type: none"> • <i>Open spaces managed to Green Flag Standard</i> • <i>Number of major developments in the South Downs National Park / High Weald AONB</i> • <i>Net gain/loss of Rights of Way</i> • <i>Percentage of new dwellings within 300m of accessible greenspace</i>
<p>En 9) To address the causes of climate change by reducing resource consumption and reducing waste.</p> <ul style="list-style-type: none"> • <i>Number of developments incorporating facilities to enable recycling</i>
<p>En 10) To ensure development does not take place in areas of flood risk, or does not contribute to increasing flood risk elsewhere, incorporating flood mitigation measures where appropriate</p> <ul style="list-style-type: none"> • <i>Number of properties at risk from flooding, as defined by the Environment Agency</i> • <i>Number of planning applications approved contrary to advice given by the EA on flood risk/defence grounds</i> • <i>Number of developments incorporating appropriate Sustainable Drainage Systems (SuDS)</i>
<p>En 11) To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car.</p> <ul style="list-style-type: none"> • <i>Car ownership</i> • <i>Proportion of journeys to work via public transport</i> • <i>Percentage of new residential development within 30 minutes public transport time of a GP, Primary and Secondary School, employment and major health centre</i>
<p>Ec 12) To ensure that sites for Gypsy and Travellers include provision of facilities to support the businesses run by Gypsy and Travellers, so as to sustain their employment.</p> <ul style="list-style-type: none"> • <i>Number of new Traveller sites incorporating business facilities (e.g. storage, keeping animals, etc.)</i>
<p>Ec 13) To ensure high and stable levels of employment so that everyone can benefit from the economic growth of the district.</p> <ul style="list-style-type: none"> • <i>Unemployment</i> • <i>Average weekly income for those employed in the district</i> • <i>Number of new businesses setting up in the district</i>

Developing and Appraising Options

1.24. The Sustainability Appraisal for the Traveller Sites Allocations DPD - Consultation Draft mainly appraises two aspects of the DPD, the overall strategy and site allocation options.

1.25. A Sites Study was undertaken to identify and consider as many potential options as possible to accommodate the permanent needs of Gypsies, Travellers and Travelling Showpeople and to develop a shortlist of potentially suitable sites for allocation, safeguarding or extension for allocation in the Traveller Sites Allocations DPD.

1.26. The framework and criteria used for site assessment work takes into account information gained from stakeholder work, the *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment*, the Government's *Planning policy for Traveller sites*, the *National Planning Policy Framework*, *Best Practice Guidance: Designing Gypsy and Traveller Sites* and local policy set out within the emerging *Mid Sussex District Plan*.

1.27. The options that were appraised were as follows:

- Marigold Farm Caravan Site, Bishopstone Lane, Ansty
- Little Clonking, Luxfords Lane, Ashurst Wood
- Extension of Bedelands Caravan Site, Valebridge Way, Burgess Hill
- Land to the north and northwest of Burgess Hill
- Land at Meadow Wood, Brook Street, Cuckfield
- Imberhorne Lane Nurseries Site, East Grinstead

1.28. The site options have been appraised against each sustainability objective. In order to record the sustainability performance, a range of colours and symbols were used:

++	Significant positive impact on the sustainability objective
+	Positive impact on the sustainability objective
+?	Possible positive or slight positive impact on the sustainability objective
0	No impact or neutral impact on the sustainability objective
-?	Possible negative or slight negative impact on the sustainability objective
-	Negative impact on the sustainability objective
--	Significant negative impact on the sustainability objective

1.29. All of the reasonable options have been appraised using these symbols. The symbol chosen depicts the predicted effect each option will have on each sustainability objective, and to what extent, accompanied with explanatory text.

1.30. A summary of the sustainability appraisal findings is shown in the table below:

Topic	Sustainability Appraisal Findings
Overall Strategy	<p>The strategy to produce a Traveller Sites Allocations DPD to allocate specific sites across the district offers a better opportunity to achieve sustainable development and is the most sustainable option. The identification and allocation of sites through a Traveller Sites Allocations DPD increases the likelihood of pitch provision and so this option scores positively both in terms of accommodation and also location, being close to services and away from sensitive areas such as areas of flood risk or conservation importance.</p>
Existing Authorised Traveller Sites	<p>Safeguarding only sites with permanent planning permission would ensure that appropriate accommodation is retained (the existing temporary sites within the High Weald Area of Outstanding Natural Beauty are not safeguarded). The safeguarding of existing sites would not have any direct impact on many objectives as the policy would not result in development. Therefore against environmental impact, climate change, flood risk, transport and business support objectives there is likely to be 'no impact' on the baseline.</p>
Traveller Sites Allocations	<p>National <i>Planning policy for Traveller sites</i> (March 2012) requires local planning authorities to identify specific deliverable sites sufficient to provide five years' worth of supply against a locally set target, and a 15 year supply of such sites where possible. Producing a DPD that meets the full identified need for Gypsy and Traveller pitches (as evidenced by the <i>Mid Sussex Gypsy and Traveller Accommodation Assessment</i>) would ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation and the Council would be able to demonstrate an adequate five-year supply of sites.</p> <p>Sustainability performance is largely dependent on the merits of specific sites but site allocation is likely to ensure that social, environmental and economic needs are met.</p>

Site Option Appraisal Conclusions

- 1.31. The Sustainability Appraisal process highlights that the majority of realistic, deliverable sites for Traveller use have a number of constraints that impact on their performance in sustainability terms. Generally those sites located in or near to major settlements perform well and where pitch provision can be met alongside new residential, employment and infrastructure development there are clear benefits.
- 1.32. All site allocation options have negative impacts on one or more of the objectives so a balance must be made between these objectives and the need to provide sufficient sites to meet the needs of Gypsies, Travellers and Travelling Showpeople. The compatibility of objectives considered in Section 5 of the main report needs to be taken into account in this regard. For example, as all options score positively against Objective So1 it is expected that there is likely to be some negative impacts against Objectives En6, En7, En9 and En10 and generally options have a neutral or negative impact on these environmental objectives.
- 1.33. The performance of each site allocation option in sustainability terms is summarised in the table below. In addition to appraising each site's performance against individual objectives each option has been appraised for its overall social, environmental and economic impacts. This overall score is not simply a mean score of the sites performance against the objectives that sit under those headings but a broader appraisal of the potential social, environmental and economic impacts of the site allocation option:

		Sustainability Objective															
		1 - Accommodation	2 - Education	3 - Health	4 - Shops	5 - Leisure	6 - Conservation	7 - Environmental Quality	8 - Countryside	9 - Climate Change	10 - Flood Risk	11 - Transport	12 - Business Support	13 - Employment	Social	Environmental	Economic
Site Allocation Options	a) Marigold Farm Caravan Site, Bishopstone Lane, Ansty	+	-	-	-	-	0	0	-?	-	0	-	0	+	-	-	0
	b) Little Clonking, Luxfords Lane, Ashurst Wood	+	-?	-	-	-	-	0	-	-	-?	-	0	0	-	-	0
	c) Bedelands Caravan Site, Burgess Hill	+	+	+	++	++	-?	0	0	-	0	++	0	+	+	-?	+
	d) Land to north + northwest Burgess Hill	++	++	++	++	++	+	+	+	-	0	+	0	++	++	0	+
	e) Land at Meadow Wood, Cuckfield	+	+	+	+	+	-	0	-	-	0	+	0	+	+	-	+
	f) Land at Imberhorne Lane Nurseries, East Grinstead	++	-?	-	+	+	-?	-?	0	-	0	+	0	+	+	0	+

Cumulative and Synergistic Impacts

- 1.34. It is important that each site allocation option is not only considered in isolation and that the potential 'in combination' sustainability impacts (either positive or negative) are also appraised.
- 1.35. It is not considered that site allocation options, given the realistic size and scale of the sites, would place an unsustainable level of pressure on local services in any settlement across the

district when considered in combination. In many cases development would provide a minor benefit in aiding the viability of existing business premises.

- 1.36. In particular the number of site allocation options located within or near to the town of Burgess Hill was considered in terms of cumulative and synergistic impacts should multiple sites be allocated at Burgess Hill. However, the combined development potential of these sites is not considered to be of a scale large enough to have significant adverse cumulative impacts on the town and services in sustainability terms, particularly if further infrastructure provision at land to the north and northwest of Burgess Hill is delivered. Evidence from stakeholders in the *Mid Sussex Gypsy and Traveller Accommodation Assessment* highlights a concentration of Traveller families in and around Burgess Hill due to employment and familial ties to the area.
- 1.37. Whilst some of the site allocation options appraised may individually have a minor impact on certain objectives, collectively the impact may be more significant. Impacts can be mitigated as far as possible through on-site measures, design and local plan policies.

Next Steps

- 1.38. The Sustainability Appraisal process is an iterative process. It is likely that further options will be put forward during the preparation of the Traveller Sites Allocations Document, particularly during its public consultation. If these options are considered to be realistic, they will be assessed through the Sustainability Appraisal process during the next stage of its production. The findings of this process will be considered in the next stage of production for the Traveller Sites Allocations DPD.