

Mid Sussex District Council



Traveller Sites Allocation Development Plan Document

Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)

Scoping Report

October 2013

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1. Introduction

1.1. National Planning Policy, in the form of the National Planning Policy Framework (NPPF) and accompanying Planning Policy for Traveller Sites requires local authorities to allocate sufficient sites to meet the needs of Gypsies, Travellers and Travelling Showpeople (henceforth referred to as “Travellers”). Mid Sussex District Council are therefore preparing a Traveller Sites Allocations Development Plan Document (DPD) which will seek to allocate such sites.

What is Sustainability Appraisal?

- 1.2. 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.
- 1.3. Sustainability Appraisal serves great importance in being an ‘informing tool’. It assures consideration is given to sustainability issues and assesses the options for solving such issues, or mitigating against them where possible through policies within the Plan.
- 1.4. This report comprises the **Scoping Report Stage** - Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Traveller Sites Allocations DPD.
- 1.5. The Scoping Report Stage identifies the current sustainability issues within Mid Sussex and suggests a range of Sustainability Objectives.
- 1.6. Future stages of the Sustainability Appraisal process will use these Sustainability Objectives to predict the social, environmental and economic effects of the Traveller Sites Allocations Development Plan Document (DPD). This will ensure it only includes policies and site options that contribute towards the aims of sustainable development, and that the final document is the most sustainable given all reasonable alternatives.
- 1.7. Section 3 of this report explains the various stages in preparing a Sustainability Appraisal report.

What is Sustainable Development?

- 1.8. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”¹. It is about ensuring better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
- 1.9. The Government’s strategy for Sustainable Development, “Securing The Future” (2005), set five guiding principles for achieving sustainable development:
 - **Living within Environmental Limits** – Respecting the limit of the planet’s environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.

¹ The Report of the Brundtland Commission, 1987

- **Ensuring a Strong, Healthy and Just Society** – Meeting the diverse needs of all people existing and future communities, promoting personal well-being, social cohesion and inclusion, and creating equal opportunity for all.
- **Building a Strong, Stable and Sustainable Economy** – Providing prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.
- **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy and diversity.
- **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

1.10. The Government sees the Planning system as a key tool for delivering sustainable development as set out in the National Planning Policy Framework:

- **Planning for Prosperity (economic role)** – use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- **Planning for People (social role)** – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of the present and future generations; and by creating a good quality built environment, with accessible local services that reflect the community’s needs and supports its health and well-being; and
- **Planning for Places (environmental role)** – use the planning system to protect and enhance our natural, built, and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.

Sustainability Appraisal – Scoping Report

1.11. The Scoping Report stage of the Traveller Sites Allocations DPD Sustainability Appraisal is the first stage of assessment.

1.12. This Scoping Report contains the following tasks:

- Identifying other relevant plans and programmes (*Appendix A*);
- Identifying the Sustainability Appraisal requirements (Section 2) and methodology (*Section 3*);
- Presenting the baseline information relevant to Mid Sussex and the aims of the Traveller Sites Allocations DPD (*Section 4*);
- Identifying Sustainability Issues as a result of the information gathered (*Section 5*);
- Developing Objectives and the Sustainability Framework in order to mitigate or improve issues identified through policies or sites in the DPD (*Section 6*); and
- Setting out how this information will be consulted upon, and how it will be used in future stages of the Sustainability Appraisal process (*Section 7*).

Consultation

1.13. This Scoping Report will be available for consultation for a 5-week period beginning 8th October 2013.

1.14. Responses received during this consultation period will inform any revisions or refinements to the Methodology, Baseline Information and Sustainability Framework. Any changes that are necessary as a result of this consultation will be reported in further stages of the Sustainability Appraisal.

1.15. As per the Strategic Environmental Assessment regulations² it will be sent (as a minimum) to the three statutory consultees for this stage:

- Natural England
- English Heritage
- Environment Agency

And published on the District Council's website at <http://www.midsussex.gov.uk/8686.htm>

1.16. Comments on this Scoping Report should be sent to:

Email:

LDFConsultation@midsussex.gov.uk

Post:

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

² "Environmental Assessment of Plans or Programmes Regulations" 2004

2. Background

Mid Sussex Planning Policy

- 2.1. Mid Sussex District Council are preparing 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 will replace the majority of the policies within the Mid Sussex Local Plan (2004).
- 2.2. The District Plan sets 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.
- 2.3. Upon adoption of the District Plan and the Traveller Sites Allocations DPD, the Development Plan for Mid Sussex will consist of:
- Mid Sussex District Plan;
 - Small Scale Housing Allocations Development Plan Document (adopted 2008);
 - Traveller Sites Allocations Development Plan Document;
 - Saved Mid Sussex Local Plan Policies (as listed in Appendix A of the District Plan – when adopted);
 - Neighbourhood Plans (various, throughout the district); and
 - Supplementary Planning Documents (as required).
- 2.4. The District Plan includes a vision for the district. This is:
- “A thriving and attractive district, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well being of our district and the quality of life for all, now and in the future”*
- 2.5. A number of strategic objectives (15 in total) were identified in order to take forward the vision and apply it to planning issues. The following strategic objectives look to ensure cohesive and safe communities, particularly relevant to providing for the needs of Gypsies and Travellers and Travelling Showpeople:
- 12 - *To develop sustainable communities which are safe, healthy and inclusive.*
- 13 - *To provide the amount and type of housing that meets the needs of all sectors of the community.*
- 2.6. In July 2013, the District Council submitted its District Plan to the Secretary of State. The Submission District Plan includes a criteria based policy for Traveller sites, should planning applications for such sites be submitted to the District Council ahead of (or in addition to) a site allocations document being adopted.

DP31 Gypsies, Travellers and Travelling Showpeople

Strategic Objectives: 12) To support sustainable communities which are safe, healthy and inclusive; and 13) To provide the amount and type of housing that meets the needs of all sectors of the community.

Evidence Base: West Sussex Gypsy and Traveller Accommodation Needs Assessment (2009); Mid Sussex Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (2013).

New Gypsy and Traveller sites, and extensions to existing sites, including transit sites, will be permitted provided:

- **The site or extension satisfies a clear local need, as evidenced by the Gypsy and Traveller Accommodation Assessment or the best available evidence;**
- **The site is reasonably located for schools, shops, health and other local services and community facilities;**
- **The development is located and designed to the recognised best practice standards to ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and wellbeing of the travellers;**
- **The sites are compatible with neighbouring land uses, and minimise impact on adjacent uses and landscape character;**
- **In rural and semi-rural areas, sites should not dominate the nearest settled community.**

Traveller Sites Allocations DPD

- 2.7. Government guidance “Planning Policy for Traveller Sites” (2012) requires local authorities to establish the needs of Gypsies, Travellers and Travelling Showpeople through a Needs Assessment and to identify a supply of deliverable sites sufficient to provide five years worth of sites against locally set targets in order to meet them. Local authorities should also identify a further supply of sites or broad locations for growth for years 6 to 10 and where possible years 11-15, similar to the National Planning Policy Framework policy requirements for ‘bricks and mortar’ housing.
- 2.8. This requirement was reflected in the District Plan policy DP31 (above) and will be delivered through the Traveller Sites Allocations DPD which will identify and allocate suitable sites. It is considered that the District Plan 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.
- 2.9. Due to the nationally-set requirement to allocate sufficient sites, it is considered that there are no realistic alternative options aside from producing a specific DPD. It is therefore not intended to appraise any further options (in terms of whether to produce a DPD) through the Sustainability Appraisal process.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Requirements

- 2.10. Section 39 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of sustainable development. The Traveller Sites Allocations DPD will be a Local Development Document and as such a Sustainability Appraisal is a statutory requirement and must be submitted and examined alongside the plan to which it refers.
- 2.11. The National Planning Policy Framework sets out that a Sustainability Appraisal should meet the requirements of the European Directive on Strategic Environmental Assessment³ (SEA).” The SEA process is very similar to the Sustainability Appraisal process albeit with more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive’s requirements. Government guidance⁴ suggests incorporating the SEA process into the Sustainability Appraisal and consider economic and social effects alongside the environmental effects considered through SEA. This approach has been followed throughout this report and for simplification, is referred to as the Sustainability Appraisal, even though it incorporates the SEA.
- 2.12. The SEA guidance outlines a number of tasks that need to be undertaken whilst preparing the SA/SEA report. These tasks are highlighted throughout (in blue, italic font) to clearly show where these requirements have been met.
- 2.13. Section 3 of this report explains the various stages in preparing a Sustainability Appraisal report.

³ Strategic Environmental Assessment involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations” 2004

⁴ A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005)

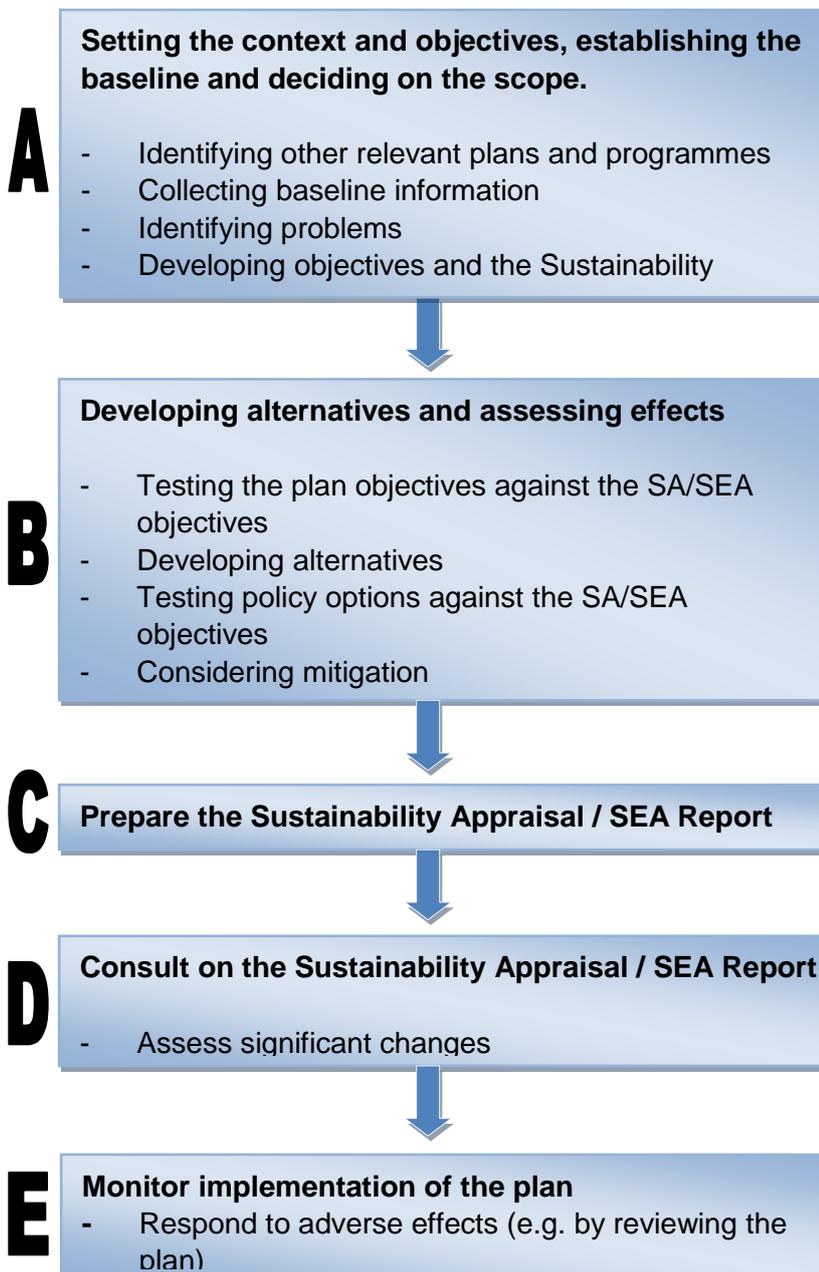
3. Methodology

3.1. This Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been prepared in accordance with the following Government guidance:

- Sustainability Appraisal guidance within the CLG Plan Making Manual
- SEA guidance from the ODPM “A Practical Guide to the Strategic Environmental Assessment Directive” (2005)

3.2. Government guidance on preparing a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are very similar. As the guidance for SEA is more prescriptive in its requirements, this has been followed whilst ensuring that the individual requirements of the SA guidance are also adhered to.

3.3. A five-stage approach has been undertaken in preparing this Sustainability Appraisal, based on this guidance:



Stage A

- 3.4. This Scoping Report is the first stage of the Sustainability Appraisal process (**Stage A**) and documents the tasks required to be undertaken at this stage. Following consultation on the Scoping Report, further stages of the Sustainability Appraisal process will be published in due course, to accompany the draft Traveller Sites Allocations DPD.
- 3.5. This Scoping Report outlines the baseline for the district – in other words, what the situation is now. It will determine the current issues related to sustainability, and develop a set of Sustainability Objectives to help address these issues.

Stages B, C, D

- 3.6. The Traveller Sites Allocations DPD will allocate sufficient sites for Travellers within the district to meet the requirements identified through the *Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment (2013)*. Future stages of the Sustainability Appraisal process will use the Sustainability Objectives established in this Scoping Report to assess the sustainability of a number of site options identified by the site allocation process in order to assess all reasonable alternatives.
- 3.7. The main objective of appraising site options is to highlight the different advantages and disadvantages of each option, with the aim of showing that the preferred site option(s) are the most sustainable, given all reasonable alternatives. Symbols, alongside explanatory text, will be used to record the performance of each site option against each sustainability objective.
- 3.8. It is intended to use the following system in the next stage of the Sustainability Appraisal:

++	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

- 3.9. The scoring system (using a range between ‘++’ and ‘--’) is consistent with other Sustainability Appraisals undertaken by the District Council (in particular the District Plan) and is suggested as an appropriate method to take in the SEA guidance. The symbol chosen depicts the predicted effect each site option will have on each sustainability objective, and to what extent, accompanied with explanatory text.

4. Baseline

- 4.1. Collecting baseline information enables an understanding of the current state of the district. This is important for two main reasons: to identify the current sustainability issues which could be remedied or mitigated through the policies/sites in the Traveller Sites Allocations DPD; and to assess what the situation would be like without the DPD in place. This will help justify the need for the DPD (in sustainability terms) and will ensure that it is written with sustainability in mind. This section will be expanded and updated in future stages of the Sustainability Appraisal process where necessary.

A1 – Identifying Other Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the District Plan

- 4.2. The submission District Plan Sustainability Appraisal (July 2013) includes a comprehensive Baseline section – including a review of relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced its development. As the Traveller Sites Allocations DPD will be written in conformity with the relevant objectives of the District Plan and in particular policy DP31 “Gypsies, Travellers and Travelling Showpeople”, it is not intended to repeat this section within this report. Appendix A of this report does, however, build upon the PPPSGIs identified in the District Plan Sustainability Appraisal by including all relevant documents that will influence the development of the DPD.

A2 – Collecting Baseline Information

- 4.3. Similarly, as the District Plan Sustainability Appraisal includes a comprehensive look at the social, environmental and economic baseline for the district, it is not intended to repeat that information within this report. The baseline information provided is therefore specific to producing the Traveller Sites Allocations DPD and should be read in conjunction with the baseline set out in the District Plan Sustainability Appraisal.
- 4.4. Data is predominantly drawn from the site survey work undertaken within the *Gypsy, Traveller and Travelling Showpeople’s Accommodation Needs Assessment (2013)*. Where other sources have been used these have been referenced. At the time of writing, data from the 2011 Census has only recently been released, however further information on specific Gypsy and Traveller datasets is not due for release until December 2013.

Social Characteristics

Population

- 4.5. The Gypsy and Traveller Caravan Count (CLG, January 2013) shows the total number of caravans in Mid Sussex were 41, the same number as counted in the previous five counts. The *Gypsy, Traveller and Travelling Showpeople’s Accommodation Needs Assessment (2013)* (GTAA) could not estimate the numbers of Travellers living in ‘bricks and mortar’ accommodation, as it is widely recognised that Travellers living in such housing do not identify themselves as they fear discrimination and prejudice from the settled community. There is, however, anecdotal evidence of a substantial number of Travellers living in bricks and mortar accommodation, particularly in Burgess Hill.

- 4.6. According to the 2011 Census, there is a population of 142 “Gypsy or Irish Travellers” (Census ethnicity definition) within Mid Sussex – 69 male and 73 female. This is dependent on the respondent identifying themselves as a Gypsy or Irish Traveller, so whilst this may not be accurate, it provides a good indication.
- 4.7. In general, the age profile of the Traveller community is considerably younger than the overall population of Mid Sussex. There are a higher proportion of 0-29 year olds, and considerably lower proportions of older people, particularly those aged 60+. This is broadly consistent with the age profile sourced from on-site surveys undertaken as part of the background to the GTAA. This age profile is also consistent with previous studies, and the 2001 Census.

Age	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
0 - 9	37	26%	16,518	12%
10 - 19	33	23%	16,980	12%
20 - 29	17	12%	14,000	10%
30 - 39	19	13%	17,494	13%
40 - 49	18	13%	22,120	16%
50 - 59	10	7%	18,153	13%
60 - 69	7	5%	16,644	12%
70 - 79	1	1%	10,174	7%
80+	0	0%	7,777	6%
TOTAL	142		139,860	

Source: Census 2011

Education

- 4.8. Information on educational attainment for Gypsy or Irish Travellers from the 2011 Census is not available at the time of writing. The GTAA reports that many Travellers opt out of mainstream education and that on average literary levels are low. This is, however, a common theme nationally and not specific to Mid Sussex.

Health

- 4.9. The GTAA notes that 43% of respondents interviewed reported that their household contained at least one member with a long-term health problem.

4.10. The 2011 Census states that the majority of Travellers are of Very Good or Good general health, however there is a significant number that are of Fair, Bad or Very Bad health in comparison to Mid Sussex residents in general. There could be many reasons for this – inadequate living conditions, access to services, the general living environment and ability to register with a GP.

General Health	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
Very Good	47	33%	72,448	52%
Good	47	33%	47,524	34%
Fair	30	21%	14,938	11%
Bad	14	10%	3,864	3%
Very Bad	4	2%	1,086	1%

Source: Census 2011

Living Accommodation

4.11. There are currently 4 sites owned and maintained by West Sussex County Council within Mid Sussex:

- Fairplace Hill, Burgess Hill (9 pitches)
- Bedelands, Burgess Hill (10 pitches)
- Horsgate, Cuckfield (3 pitches)
- Walstead, East Mascalls Lane, Lindfield (4 pitches)

4.12. In addition to those maintained by the County Council, there are as at September 2013, a further 7 sites with planning permission within the district:

- 1 & 4 Highfields, Brighton Road, Warninglid (permanent, 6 pitches)
- Pitts Head, London Road, Warninglid (permanent, 4 pitches)
- Marigold Farm, Bishopstone Lane, Ansty (permanent, 1 pitch)
- Little Clonking, Luxfords Lane, Ashurst Wood (temporary, 1 pitch)
- Land at Meadow Wood, Brook Street, Cuckfield (temporary, 1 pitch)
- Market Garden Caravan, Clappers Lane, Fulking (temporary, 1 pitch)

4.13. There are two further private sites without planning permission, but are tolerated:

- Marylands Nursery, Bolney (1 pitch)
- Marigold Farm, Bishopstone Lane, Ansty (1 pitch)

4.14. There are therefore a total of **42** pitches currently within Mid Sussex. A site at Clappers Lane, Fulking is within Mid Sussex, but is located in the South Downs National Park, the Local Planning Authority for that area.

4.15. According to the GTAA. 50.1% of residents on sites state that they are fairly satisfied with their site, with 40.9% declaring that they are 'very satisfied'. The remaining 9% of residents were not satisfied. Residents were asked if they felt improvements were needed on their site – 30% felt that improvements were needed. The majority of these felt that pest control was an issue, with site management, site safety and better washing facilities all important improvements suggested. The majority of residents (83.3%) did feel that their needs could be met on their current site/pitch.

Environmental Characteristics

4.16. The majority of information in the following categories is relevant to the whole district, not specifically to the Traveller community. The District Plan Sustainability Appraisal contains a comprehensive review of the environmental characteristics of Mid Sussex; therefore the following headings highlight only the key characteristics relevant to the Traveller Sites Allocations DPD.

Biodiversity, Landscape, Archaeology

4.17. Mid Sussex has a high quality environment with a number of important assets – namely the South Downs National Park in the southern part of the district and the High Weald Area of Outstanding Natural Beauty in the north. Combined, these areas cover approximately 60% of the district. Mid Sussex also contains 13 Sites of Special Scientific Interest (SSSI) and 50 Sites of Nature Conservation Importance (SNCI). There are no European-designated sites within Mid Sussex although the Ashdown Forest (designated as a Special Protection Area and Special Area of Conservation under EU law) is adjacent in the neighbouring Wealden District.

4.18. It will be important when assessing the suitability of new Traveller sites that these important features are taken into account, in order to reduce any adverse impact. The GTAA provides an assessment of suitability for Traveller sites in proximity to these constraints.

Soil

4.19. Best and Most Versatile Agricultural Land is classified as Grades 1-3a as per the Agricultural Land Classification. There is no Grade 1 land (the best quality) within the district, although 1.4% is classified as Grade 2, and 63.7% as Grade 3, some of which is likely to fall into the better grade 3a category, although this data isn't readily available.

4.20. New sites for Travellers will need to be sited away from contaminated land, and will need to prevent contamination from sewerage entering the soil or watercourse.

Air Quality, Noise and Odour

4.21. There is one Air Quality Management Area (AQMA) within Mid Sussex at Stonepound Crossroads, Hassocks due to the levels of Nitrogen Dioxide (NO₂) directly caused by the level of road traffic. In order to mitigate and remedy this, an action plan will be produced. This situation will be monitored, and will need to be taken into account when planning development that could have an impact on this AQMA.

Water

- 4.22. Demand for water is rising, with Mid Sussex residents using approximately 181 litres of water per day.
- 4.23. The majority of water bodies in the district are failing to meet 'Good' status under the Water Framework Directive. It will be important for new sites to have mains sewerage connections to ensure the risk of contamination of soils and water bodies is minimised.
- 4.24. The Mid Sussex Strategic Flood Risk Assessment (SFRA) identifies areas within the district that are at risk from flooding. Approximately 9km² (2.7% of the total land area) are within areas at high risk of flooding (Flood Zone 2 or 3) as defined by the Environment Agency. Future sites should avoid flood risk zones (as per the National Planning Policy Framework). The vulnerability of caravans to flooding will be a key concern.

Climate Change

- 4.25. There is no specific data on the impacts of traveller sites or the traveller community on climate change. The traveller community are expected to use the same resources (heating, electricity, car usage) as the settled population. It is expected that, due to lower levels of insulation in caravans, this may result in higher energy use requirements compared to the average. There may be potential for renewable sources of energy to be utilised on Traveller sites, and in particular on bricks and mortar properties.

Economic Characteristics

Employment

- 4.26. According to the 2011 Census, almost half of all Gypsy or Irish Travellers are economically inactive – in other words, they are either not of working age, or are not able/seeking work. The majority of these state that they are looking after home or family or are retired. This broadly corresponds with the information gathered from sites as part of the background work to the GTAA.

Employment Status	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
Economically Active - In Employment	31	38%	72,805	65%
Economically Active - Unemployed	10	12%	2,803	2%
Economically Inactive	39	49%	37,147	33%

Source: Census 2011

4.27. The GTAA notes that, of those that were economically active and employed, 38% of these were undertaking casual or temporary work. This was generally building work, landscaping, gardening and tree work. Only 3% of respondents to the GTAA stated that they were working in a full time job.

Challenges Collecting Baseline Data

4.28. The majority of statistical information within this baseline section has been sourced from the Gypsy and Traveller Accommodation Assessment (GTAA, 2013) or from the 2011 Census. As such, it represents the most up-to-date data available at the time of writing. It should be noted that the Census should provide more accurate results than the GTAA as the survey work undertaken for the GTAA didn't speak to all households, and only concentrated on Travellers on sites (as there were difficulties contacting families in bricks and mortar housing, as previously discussed).

4.29. More general challenges in collecting the data are as follows:

- In a few instances, it has been difficult to obtain data specific to Mid Sussex. Instead County or National data is used, and where this is the case it has been referenced in this section. Where Mid Sussex data has not been possible to obtain, the next 'lowest level' data has been used (e.g. county, then regional, then national).
- As external organisations collect some data, Mid Sussex District Council has little control over how and when the data is collected and whether this may change in the future. It is important for monitoring purposes that the information is from a reliable source and can be compared with similar data retrieved over time in order for reasonable comparisons / trend analysis to be made.

5. Sustainability Issues

A3 – Sustainability Issues and the Challenges Facing the District

5.1. The baseline information and plans, programmes, policies, strategies, guidance and initiatives (PPPSGs) set out in the previous section and Appendix 1 help to determine the sustainability issues and challenges facing Mid Sussex District, related to Travellers. These challenges include:

- 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.

5.2. A range of Sustainability Objectives and Indicators, collectively known as the Sustainability Framework, will be developed to assess the contribution the Traveller Sites Allocations DPD will make towards sustainable development. The Framework will also be used to measure progress over time to assess whether the sustainability issues identified above are being improved where possible.

6. Sustainability Framework

Task A4 – Developing the Sustainability Appraisal / SEA Objectives

- 6.1. Future stages of the Sustainability Appraisal process will test the various policy and site options against the Sustainability Framework to determine the most sustainable policy/site options given all reasonable alternatives. To do this, the Sustainability Framework has been devised at this Scoping stage to allow comment from consultees during the designated consultation period, so that this can be refined if necessary before the appraisal process begins.
- 6.2. A range of Social (**So**), Environmental (**En**) and Economic (**Ec**) sustainability objectives have been identified to assess the contribution the Traveller Sites Allocations DPD will make towards achieving sustainable development. These are based on the sustainability issues and challenges identified in the previous section.
- 6.3. A range of accompanying indicators have also been developed to measure progress against these objectives once the DPD is adopted. This will determine how successful the DPD has been in improving the sustainability issues identified in the previous section.
- 6.4. Together the Objectives and Indicators make up the Sustainability Framework. When appraising the policies/sites within the Traveller Sites Allocations DPD, an assessment will be made as to their predicated impact on the Sustainability Framework. The impact of the policy/site will be scored accordingly – a prediction as to whether the baseline status of each objective will improve (**++**, **+**, **+?**), stay the same (**0**) or get worse (**--**, **-**, **-?**) as a result of the policy in question (as set out in Section 3 – Methodology).
- 6.5. The sustainability objectives and their corresponding indicators are:

So 1) To ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets their needs

- *New additional pitches/plots delivered*

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

- *Percentage of population of working age qualified to NVQ Level 3 or equivalent*
- *Percentage of adults with poor literacy and numeracy skills*
- *Percentage of new traveller accommodation within 30 minutes public transport time of a primary and secondary school*

So 3) To improve the access to health facilities and reduce inequalities in health

- *Number of applications resulting in new, extended or improved health facilities*
- *Percentage of new traveller accommodation within 300 metres of accessible green space*
- *Percentage of new traveller accommodation within 30 minutes public transport time of a GP, hospital or major health centre*

So 4) To improve accessibility to retail and community services

- *Distance of traveller sites from key retail and community services (post office, convenience store, library, place of worship, community hall, etc)*

So 5) To improve accessibility to leisure and recreation facilities

- *Distance of traveller sites from key leisure and recreation facilities (leisure centre, etc)*

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.

- *Condition of internationally and nationally important wildlife and geological sites (SSSI, SNCI, SAC, Ramsar)*
- *Number and area of SNCIs and LNRs within the district*
- *Area of ancient woodland within the district*
- *Number of planning applications approved contrary to advice given by Natural England*

En 7) To maintain and improve the environmental quality of the district in terms of air pollution, soil (including contaminated land) and water quality

- *Number of Air Quality Management Areas within the district*
- *Number of stretches of watercourse that are rated (as a minimum) "Moderate" under the Water Framework Directive*
- *Incidents of major and significant water pollution within the district*
- *Total area of contaminated land within the district*
- *Total area of Best and Most Versatile Agricultural Land within the district.*

En 8) To protect, enhance and make accessible for enjoyment, the district's countryside

- *Open spaces managed to Green Flag Standard*
- *Number of major developments in the South Downs National Park / High Weald AONB*
- *Net gain/loss of Rights of Way*
- *Percentage of new dwellings within 300m of accessible greenspace*

En 9) To address the causes of climate change by reducing resource consumption and reducing waste.

- *Number of developments incorporating facilities to enable recycling*

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

- *Number of properties at risk from flooding, as defined by the Environment Agency*
- *Number of planning applications approved contrary to advice given by the EA on flood risk/defence grounds*
- *Number of developments incorporating appropriate Sustainable Drainage Systems (SuDS)*

En 11) To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car.

- *Car ownership*
- *Proportion of journeys to work via public transport*
- *Percentage of new residential development within 30 minutes public transport time of a GP, Primary and Secondary School, employment and major health centre*

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.

- *Number of new traveller sites incorporating business facilities (e.g. storage, keeping animals, etc)*

Ec 13) To ensure high and stable levels of employment so that everyone can benefit from the economic growth of the district.

- *Unemployment*
- *Average weekly income for those employed in the district*
- *Number of new businesses setting up in the district*

7. Next Steps

- 7.1. This Scoping Report is the first stage of the Sustainability Appraisal process. The first formal stage of the Traveller Sites Allocations DPD (the 'Options' / 'Consultation Draft' stage) will be accompanied by a Sustainability Appraisal report which represents the second stage of the Sustainability Appraisal process.
- 7.2. This Scoping Report will be subject to consultation for a minimum of 5 weeks. Responses received during this consultation period will inform any revisions or refinements to the methodology, baseline and sustainability framework. Any changes that are necessary as a result of this consultation will be reported in the second stage Consultation Draft Sustainability Appraisal. In particular, it is acknowledged that some of the baseline information within this Scoping Report is from a dated source which is being updated as part of the evidence base for the Traveller Sites Allocations DPD. The next stage will present the opportunity to update the baseline section.
- 7.3. The 'Consultation Draft' Sustainability Appraisal will report the appraisals of all policy/ site options identified as reasonable and realistic, as per the methodology outlined in this report. This too will be subject to consultation, with the same consultation arrangements as per the Consultation Draft Traveller Sites Allocations DPD. A further report will outline any significant changes to inform the final document.

Appendix 1 – Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGs)

The Sustainability Appraisal that accompanies the draft District Plan contains a comprehensive review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGs) that have influenced the development of the District Plan. As it is intended that the Traveller Site DPD is based upon the strategic objectives of the District Plan, the majority of the PPPSGs listed in the draft District Plan SA are relevant and have informed the content of the Traveller Sites Allocations DPD. Rather than repeat those here, the key PPPSGs relevant to the production of the Traveller Sites Allocations DPD and Sustainability Appraisal are listed below.

Document	Broad Aims / Relevant Policies	Requirements of the Document in Relation to the Traveller Sites Allocations DPD
International		
The Johannesburg Declaration on Sustainable Development	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	Interpreted into national sustainable development strategies, which will inform the Traveller Sites Allocations DPD.
National		
National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The Traveller Sites Allocations DPD must be in conformity with the NPPF.
Planning Policy for Traveller Sites	Requires Local Authorities to establish needs and identify a supply of specific deliverable sites against locally set targets.	The Traveller Sites Allocations DPD has been prepared due to and in line with the requirements of the Planning Policy for Traveller Sites.
Localism Act 2011	Act that decentralises power as far as possible from central Government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures.	The Traveller Sites Allocations DPD will be prepared with the requirements of the Localism Act in mind.
Sustainability Appraisal Guidance within the CLG Plan Making Manual	Sets out guidance on how to prepare sustainability appraisals, incorporating the SEA Directive requirements, for	The Sustainability Appraisal must be fully integrated with the Traveller Sites Allocations DPD and the emerging document must demonstrate that the findings of the sustainability work have been taken into account at each stage.

	Development Plan Documents	
A Practical Guide to the Strategic Environmental Assessment Directive	Provides information and guidance on how to comply with the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”	The Sustainability Appraisal must fully integrate the SEA requirements.
The Town and Country Planning (Local Planning) (England) Regulations 2012	Sets out the regulations for preparing Local Development Documents.	The Traveller Sites Allocations DPD will be prepared in accordance with the Regulations.
Planning and Compulsory Purchase Act 2004	Clause 39 places a duty on Local authorities to contribute to sustainable development.	Mid Sussex District Council is required to produce a Sustainability Appraisal to accompany certain planning documents, including the Traveller Sites Allocations DPD.
Town and Country Planning Act 1990	Sets out the procedures for preparation, approval and adoption of Development Plans and for the control of development.	Certain parts of the Act need to be adhered to in preparing the Traveller Sites Allocations DPD.
Equality Act 2010	The Equality Act makes it illegal to discriminate on the grounds of race, colour, nationality or national or ethnic origins.	The Traveller Sites Allocations DPD will be prepared in accordance with the Act.
Regional / County		
West Sussex Gypsy and Travellers Accommodation Assessment (2007)	Sets out a requirement for Mid Sussex for 14 permanent pitches in Mid Sussex for the period 2006-2011	Gives an indication on the quantity and size of site that will be required for delivery through the Traveller Sites Allocations DPD. This evidence is in the process of being updated (due for publication early 2013)
Partial Review of the South East Plan – Accommodation Needs of Gypsies and Travellers: Report of the Panel	Includes information regarding the evidence base submitted as part of the partial review	Does not hold any planning weight and does not form part of the planning system, although is useful in terms of background information.
Local		
District Plan (Submission document) 2013	Sets out the policy upon which the Traveller Sites Allocations DPD is based, along with the planning strategy for the District 2011-2031.	The District Plan contains the overarching planning strategy for the district. As it sets the policy upon which the Traveller Sites Allocations DPD will be based, the DPD will need to be written in accordance with the District Plan – in particular the policy and strategic objectives.

Housing Strategy for Mid Sussex 2009-2014	The key aim is to set out how a supply of good quality housing will be provided across the district. This provision also includes affordable housing.	One of the Document's objectives is to "promote independence and inclusion" which underlines the Council's intentions to take a plan-led approach to providing suitable accommodation for Gypsies and Travellers.
Gypsy and Traveller Strategy 2009-2012	Sets out the Council's strategy for Gypsies and Travellers. It aims to address the inequalities faced by Gypsies and Travellers in Mid Sussex, whilst recognising the needs of the settled community.	One of the Document's objectives is to "Meet the accommodation needs of Gypsies and Travellers", which underlines the Council's intentions to take a plan-led approach to providing suitable accommodation for Gypsies and Travellers.
Mid Sussex Sustainable Communities Strategy (2008)	Sets out key objectives to enable sustainable development of the communities of Mid Sussex: <ul style="list-style-type: none"> • Protecting and enhancing the environment • Ensuring cohesive and safe communities • Promoting economic vitality • Supporting healthy lifestyles 	The issues and objectives in this strategy will need to be addressed in the District Plan. Many of these objectives are relevant to the Traveller Sites Allocations DPD.
Mid Sussex District Council – Statement of Community Involvement (SCI)	Sets out how the Council will engage with the public in the preparation and adoption of Development Plan Documents. To reflect the varying nature of the DPDs, different techniques are being used for each document to ensure that the appropriate engagement occurs.	The production of the Traveller Sites Allocations DPD has and will need to have regard to the community engagement methods for DPDs, set out in the SCI.