

Planning for Gypsies and Travellers and Travelling Showpeople

**Sustainability Appraisal and Strategic
Environmental Assessment of the
Secretary of State's Proposed Changes
to the Revision to the Regional Spatial
Strategy for the East of England**

Non Technical Summary

Government Office of the East of England

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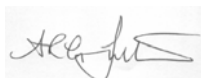
March 2009

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1 INTRODUCTION

1.1 NON-TECHNICAL SUMMARY

This report is part of the Sustainability Appraisal (incorporating the requirements of the SEA Directive) of the revision of the Regional Spatial Strategy (RSS) for the East of England addressing the provision of accommodation for Gypsy and Travellers. It provides commentary on the likely significant social, environmental and economic effects of the option being considered at the Secretary of State's Proposed Changes stage of the review.

The full report of the Sustainability Appraisals can be found on the Government Office of the East of England website

1.2 BACKGROUND TO THE RSS REVIEW

The Review aims to align the Regional Spatial Strategy with the requirements of Circular 01/2006, which the East of England RSS does not currently do. The Circular states that 'The RSS revision should identify the number of pitches required (but not their location) for each local planning authority in the light of local authority Gypsy and Travellers Accommodation Assessments (GTAAs) and a strategic view of needs across the region'. (ODPM Circular 01/2006, paragraph 23). The Secretary of State's Proposed Changes also aim to ensure the RSS is consistent with the requirements of CLG Circular, 04/2007, Planning for Travelling Showpeople.

Once published, the revision will provide the regional policy framework within which Local Planning Authorities will develop Local Development Documents. It will also influence other regional policy documents that may impact on the Gypsy and Traveller and Travelling Showpeople communities, such as the Regional Housing Strategy and the Regional Economic Strategy.

The draft policy and its Sustainability Appraisal and Habitats Directive Assessment has been subject to an Examination in Public (October 2008). The independent Panel has published its report (December 2008). This report is an integral part of the process of finalising the policy. This report will help to inform the Secretary of State's Proposed Changes to the draft policy and will form an integral part of the public consultation of the Proposed Changes. The Panel made specific recommendations for the further Sustainability Appraisal of this policy which are addressed in this report.

This report contains the following sections:

- Section 2:** The Gypsy and Traveller and Travelling Showpeople Review
- Section 3:** Methodology and Scope of the Sustainability Appraisal
- Section 4:** SA of the Secretary of State's Proposed Changes
- Section 5:** Implementation and Monitoring
- Section 6:** Appraisal of the Cumulative Effects of the Review
- Section 7:** Appraisal of the Significant Effects of the Review
- Section 8:** Conclusions and Recommendations

2 *THE GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE REVIEW*

2.1 *INTRODUCTION*

This section of the Non-Technical Summary provides a brief introduction to the process of carrying out the review and then sets out the proposed revision incorporating the Secretary of State 's Proposed Changes.

2.2 *THE PROCESS*

The East of England Plan, which together with relevant sections of the Milton Keynes South Midland Sub- Regional Strategy constitutes the Regional Spatial Strategy for the East of England, was published on 12th May 2008. The Draft East of England Plan was submitted by the East of England Regional (EERA), the Regional Planning Body (RPB) to the Secretary of State in December 2004 and underwent an Examination in Public (EiP) from November 2005 until March 2006. The adequacy of provision for Gypsies and Travellers in the emerging RSS was the subject of some debate at the Examination in Public. In its evidence to the EiP, EERA acknowledged that the submitted draft RSS was deficient regarding this matter and indicated that it intended to address this by bringing forward a single issue revision to the RSS rapidly following the Examination in Public.

The purpose of the revision was to bring the RSS for the East of England into line with Government policy regarding the provision of Gypsy and Traveller Caravan Sites. The emerging RSS is currently out of line insofar as Government Circular 01/06 (ODPM) (in paragraph 23) states that "The RSS revision should identify the number of pitches required (but not their location) for each local planning authority in the light of local authority Gypsy and Travellers Accommodation Assessments (GTAAAs) and a strategic view of needs across the region".

For the purposes of Circular 01/06 (ODPM) "Gypsies and Travellers" means;

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such".

In the light of information available an Issues and Options Consultation Document was prepared and following consideration by Regional Planning Panel on 8th March 2007 was published for 12 weeks public consultation in May 2007. The document sought to set out information relevant to the review and posed 11 questions which sought to determine attitudes towards four issues.

These Issues were:

- The appropriate scale of pitch provision across the region;
- The distribution of provision;
- Delivery and Implementation Issues; and
- Travelling Showpeople.

The Consultation Document also contained two options for the spatial distribution of the assessed requirement for 1,220 pitches provision to promote debate.

At the meeting on 27th September 2007 the Regional Planning Panel agreed to:

- endorse the conclusion that no further formal public consultation was needed in advance of the submission of the draft revision to government;
- endorse a modified figure of 1,190 (rounded from an exact figure of 1,187) as a robust estimate of the total number of net additional gypsy and traveller residential pitches required in the East of England in the period 2006-2011; and
- request a draft revision to the Regional Spatial Strategy for the East of England be brought before the Regional Planning Panel meeting on 12th December 2007 for consideration.

At the meeting on 12th December 2007 the Regional Planning Panel considered the consultation response, the results of the targeted research with the Gypsy and Traveller community (the Ormiston Report), the Sustainability Appraisal of the Proposed Revision and agreed the text of the revision to the East of England RSS.

The revision was endorsed by the Assembly on 25th January 2008 and formally submitted to the Secretary of State on 25th February 2008. The Town and Country Planning (Regional Planning) (England) Regulations 2004 allow for the Secretary of State to reduce the minimum period of consultation from 12 weeks to 6 weeks if a draft revision is a minor amendment. This issue was discussed with the Government Office for the East of England and EERA was advised that the revision would not be treated as a minor amendment.

The submission of the revision was accompanied by:

- A covering letter containing details of potential changes in national policies proposed by the Regional Assembly to support implementation of the policy [this letter also incorporated a statement that the draft revision is available for inspection, particulars of the places and times at which it can be inspected, and a list of relevant supporting technical documents];

- The Sustainability Appraisal Report (incorporating Strategic Environmental Assessment) and the Habitats Regulations Screening Assessment;
- A pre-submission consultation statement; and
- A statement regarding delivery and monitoring

2.2.1 *Examination in Public and Panel Report*

There was an Examination in Public under an independent Panel between 20th and 24th October, 2008, which tested the soundness of the Draft Review. The Panel's Report was submitted to the Secretary of State and published in December 2008. The Panel made 42 recommendations to the Secretary of State, including:

- Increasing the number of pitches to be provided by 2011 from 1,187 to 1,237 and treating them as minima (Panel Recommendations 4.20, 4.21);
- Including provision for transit sites: 160 pitches by 2011 (Recommendation 5.1);
- Including provision for Travelling Showpeople: 184 plots by 2011 (Recommendation 6.1);
- The Regional Assembly should carry out a further review of needs and the RSS policy in 2011 or soon afterwards, which should also address the needs of Gypsies and Travellers in bricks and mortar housing, New Travellers, and Travelling Showpeople (Recommendations 2.1, 6.2, 8.2);
- The Assembly should produce a Delivery Plan, including clarifying the delivery role of the Homes and Communities Agency (Recommendation 8.1); and
- The Policy should stress the role of major development sites in enabling provision (Recommendations 7.7).

The Panel broadly supported the Assembly's approach to the geographic distribution of additional pitches. They recommended reductions in the pitch requirements for the mainly urban and Green Belt districts of Basildon, Epping Forest, St Albans, Stevenage and Watford and increases in a group of more geographically extensive and rural districts.

Secretary of State's Proposed Changes

This SA is being published with and has informed the Secretary of State's decisions on the recommendations by the EIP Panel and the Draft Revision to the RSS incorporating the Secretary of State's Proposed Changes.

THE DRAFT REVISION TO THE REGIONAL SPATIAL STRATEGY
INCORPORATING THE SECRETARY OF STATE'S PROPOSED CHANGES

Policy H3 – Provision for Gypsy and Travellers¹

Local authorities should make provision through Development Plan Documents for at least 1,237 net additional residential pitches for Gypsy and Traveller Caravans by 2011 distributed as follows:

District	<i>Authorised Pitches in 2006</i>	Minimum Additional Pitches 2006-2011	<i>Minimum Pitches 2011</i>
Bedford	20	25	45
Central Bedfordshire	118	80	198
Luton	20	15	35
Cambridge	0	15	15
East Cambridgeshire	59	35	94
Fenland	183	89	272
Huntingdonshire	20	25	45
South Cambridgeshire	203	69	272
Peterborough	95	30	125
Basildon	112	62	174
Braintree	25	25	50
Brentwood	10	15	25
Castle Point	0	15	15
Chelmsford	35	46	81
Colchester	5	25	30
Epping Forest	94	34	128
Harlow	34	15	49
Maldon	39	15	54
Rochford	3	15	18
Tendring	2	15	17
Uttlesford	37	25	62
Southend	0	15	15
Thurrock	80	44	124
Broxbourne	22	18	40
Dacorum	36	20	56
East Hertfordshire	7	25	32
Hertsmere	35	18	53
North Hertfordshire	6	15	21
St Albans	52	28	80
Stevenage	14	10	24

(1)¹ Gypsies and Travellers as defined in ODPM Circular 01/2006, Planning for Gypsy and Traveller Caravan Sites, paragraph 15.

Three Rivers	11	15	26
Watford	10	10	20
Welwyn Hatfield	51	17	68
Breckland	32	15	47
Broadland	2	15	17
Great Yarmouth	4	15	19
King's Lynn & West Norfolk	93	53	146
North Norfolk	1	15	16
Norwich	18	15	33
South Norfolk	25	28	53
Babergh	0	15	15
Forest Heath	35	18	53
Ipswich	43	15	58
Mid Suffolk	69	42	111
St Edmundsbury	2	20	22
Suffolk Coastal	0	31	31
Waveney	20	15	35
East of England	1,782	1,237	3,019

Local authorities should achieve the levels of provision required by 2011 as soon as possible through development control decisions and Local Development Documents. The preparation of joint or co-ordinated Local Development Documents is encouraged and where they are produced, provision can be redistributed across the areas concerned. Opportunities should be taken to secure provision through major developments.

Beyond 2011 provision should be made for an annual 3% compound increase in residential pitch provision, equivalent to 1,038 additional pitches between 2011 and 2021. Where Local Development Documents look beyond 2011 provision should be made for the same proportion of the regional requirement as in Policy H3 for 2006-11.

Local Development Documents should consider the need for rural exception sites and the alteration of Green Belt boundaries, where necessary, to meet the required provision.

Local authorities should work together to establish a network of transit pitches. Provision should be made through Development Plan Documents for an additional 160 transit pitches by 2011, distributed as in the table below. The location and size of sites should be defined following local studies.

County groupings	Existing Provision (pitches)	Additional Pitches 2006-11	Locational Guidance
Bedfordshire & Luton	Nil	10	Central location capable of meeting a range of needs; could be two smaller sites.
Cambridgeshire & Peterborough	Nil	40	Cambridge area, Fenland, Huntingdonshire and Peterborough.
Essex, Southend-on-Sea, & Thurrock	Nil	30	Distributed network of 3-4 sites aligned with transport routes and urban centres.
Hertfordshire	15	20	Two sites, one in South West Hertfordshire, complementing the existing South Mimms site, the other in North East Hertfordshire.
Norfolk	18	40	Across Norfolk, including Norwich fringe.
Suffolk	Nil	20	Two sites, one in the Ipswich/Felixstowe area.

5.11 There is an urgent need to address the shortage of permanent and transit accommodation for Gypsies and Travellers, which creates problems for Gypsy and Traveller communities in terms of access to health, education, employment and other opportunities and can create tensions over the use of pitches without planning permission. This is a national issue, but particularly pressing in the East of England.

5.12 The level of provision in Policy H3 reflects the needs of those currently resident on sites without planning permission, natural growth and movements between pitches and other forms of accommodation. The provision of permanent Gypsy and Traveller pitches contributes towards meeting local housing targets and pitches provided by Local Authorities or Registered Social Landlords to affordable housing targets.

5.13 Accommodation is concentrated in certain parts of the region. Policy H3 balances providing most additional pitches in those parts of the region where most Gypsies and Travellers currently live with broadening the choice available to families by providing some pitches in all parts of the region which will assist delivery by ensuring all areas contribute to provision.

5.14 Delivery of the required pitches by 2011 will provide for the existing backlog. The 3% compound increase in provision will ensure that accommodation will be available to meet continuing needs after 2011.

5.15 Local Development Documents should identify the location and capacity of sites to deliver the pitch requirements in Policy H3 in locations likely to be attractive to the local Gypsy and Traveller communities while avoiding areas at risk of flooding and adverse effects on areas of wildlife and landscape importance. Guidance on site location is provided in ODPM Circular 01/2006 and on site layout and design in Designing Gypsy and Traveller Sites, CLG May 2008. Policies should recognise the diversity of the Gypsy and Traveller communities, for instance, provision of sites for New Travellers may require different forms of site development.

Policy H4 – Provision for Travelling Showpeople¹

Local authorities should make provision through Development Plan Documents for 184 net additional plots for Travelling Showpeople by 2011, distributed as in the table below. Where Local Development Documents look beyond 2011 they should provide for an annual 1.5% compound increase in plots.

County groupings	Existing Provision (families)	Additional Plots 2006-11	Locational Guidance
Bedfordshire & Luton	27	13	Bedford and elsewhere
Cambridgeshire & Peterborough	54	18	East Cambridgeshire and elsewhere
Essex, Southend-on-Sea, & Thurrock	166	103	Needs in Thurrock and also Chelmsford, Basildon and elsewhere. Locations should take account of the wider distribution philosophy in paragraph 5.13.
Hertfordshire	60	20	Needs in Broxbourne and

(2) ¹ Travelling Showpeople as defined in CLG Circular 04/2007, Planning for Travelling Showpeople, paragraph 15.

			also in East Hertfordshire
Norfolk	75	21	Norwich and elsewhere
Suffolk	20	9	Suffolk Coastal and elsewhere

Local authorities should work in County groupings with local Travelling Showpeople and the Showmen's Guild to identify the sites required to meet the above needs for inclusion in Local Development Documents. The preparation of joint or co-ordinated documents is encouraged.

Local Development Documents should consider the need for rural exception sites and the alteration of Green Belt boundaries, where necessary, to meet the required provision.

5.16 The interim targets in Policy H4 will ensure that the accommodation needs of Travelling Showpeople in the East of England can be met, as required by CLG Circular 04/2007. The 1.5% compound increase in provision will ensure that accommodation will be available to meet continuing needs after 2011.

5.17 Local Development Documents should identify the location and capacity of sites sufficient to deliver the plot requirements in Policy H4 in locations likely to be attractive to Travelling Showpeople while avoiding areas at risk of flooding and adverse effects on areas of wildlife and landscape importance. Guidance on site location is provided in CLG Circular 04/2007.

Delivery, Monitoring and Review

5.18 Delivering 1,237 additional residential pitches, 160 transit pitches and 184 plots for Travelling Showpeople by 2011 poses challenges. The Regional Assembly, local authorities, the Homes and Communities Agency, Gypsy and Traveller communities, the Showmans Guild and others should work together to ensure delivery. The Regional Assembly are developing a Delivery Plan, which will identify the range of delivery mechanisms and the role of the different agencies in securing delivery. Policy H3 stresses the importance of using opportunities presented by major developments to secure delivery. In this context major developments will vary relative to the range of developments in each district: the objective is to ensure there are opportunities to help secure the required provision in each area.

5.19 The Regional Assembly, working with partners, should monitor net changes in numbers of permanent and transit pitches, pitches with temporary permission and unauthorised pitches for Gypsies and

Travellers, together with net changes in plots for Travelling Showpeople, for inclusion in its annual monitoring reports.

5.20 The Regional Assembly (or its successors, the Regional Development Agency and Local Authority Leaders Board) working with the local authorities should ensure a coordinated review of Gypsy and Traveller Accommodation Assessments across the region and of Policies H3 and H4 in, or as soon as possible after, 2011. The GTAAs should be carried out on a consistent basis and consider the needs of Gypsies and Travellers living in bricks and mortar housing, Travelling Showpeople, and New Travellers.

3.1 SUSTAINABILITY APPRAISAL PROCESS

This appraisal aims to predict and assess the economic, social and environmental effects which are likely to arise from the Single Issue Review. The appraisal integrates two processes:

- *Sustainability Appraisal (SA)*, a process for understanding whether policies, strategies or plans promote sustainable development, and for improving those policies etc to deliver more sustainable outcomes. SA is required for Regional Spatial Strategies under the *Planning and Compulsory Purchase Act 2004*.
- *Strategic Environmental Assessment (SEA)*, a process for predicting the significant environmental impacts of specific plans and programmes and taking them into account. SEA is required for Regional Spatial Strategies under *EU Directive 2001/42*, transposed into English law by the *Environmental Assessment of Plans and Programmes Regulations 2004*.

The appraisal process has been designed to meet the statutory requirements applying to both SA and SEA, as presented in guidance provided by the Government. In particular, the appraisal process has been developed with reference to '*Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*' Guidance for Regional Planning Bodies and Local Planning Authorities published in November 2005.

In line with government guidance, the process is called '*Sustainability Appraisal*'.

3.2 SUSTAINABILITY APPRAISAL AT THE PROPOSED CHANGES STAGE

An SA is an iterative process that continues throughout the processes and consultation of the review of a plan or programme. As such, the previous stages in the SA have informed this appraisal.

3.3 APPRAISAL TEAM

The appraisal of the Secretary of State's emerging Proposed Changes has been carried out by Environmental Resources Management (ERM) on behalf of the Government Office of the East of England.

3.4

THE STAGES OF ASSESSMENT

As required by Government Guidance, this SA has completed three stages of the Government's five stage process, producing a number of reports for consideration, these are described below:

Scoping Report: a Scoping Report was published for consultation. The consultation responses received were reviewed and reflected in the Draft Sustainability Appraisal Report

Issues and Options SA: issued for public consultation with EERA's Issues and Options report in May 2007.

Submission Draft SA Report: published with the Draft Review submitted to the Secretary of State.

This SA has been carried out to accompany the Secretary of State's Proposed Changes. It has assessed the Secretary of State's emerging Proposed Changes, including the need to address certain concerns raised by the Panel following the discussion at the Examination in Public.

3.5

CONSIDERATION OF ALTERNATIVES

Reflecting the requirements of the Environmental Assessment of Plans and Programmes Regulations in regard to assessing 'reasonable alternatives' the Issues and Options SA compared two options. The Submission Draft SA appraised the preferred option which it assessed relative to the baseline position. This Proposed Changes SA has assessed the Draft policy incorporating the Secretary of State's Proposed Changes on the basis that it is a variant of EERA's preferred option, rather than a stand alone alternative.

3.6

QUESTIONS RAISED BY THE REPORT OF THE PANEL

At paragraphs 3.3-3.6 of their report the Examination in Public Panel questioned why the assessment of EERA's submission draft policy differed from that of Option 2 at the Policy Options stage when the submission draft was based on the principles of Option 2. This section responds to those questions.

The appraisal carried out at the Issues and Options stage considered two options. Option 1 was based on meeting needs in the locations where it arose, drawing on the evidence of the Gypsy and Traveller Accommodation Assessments (GTAAAs), together with the benchmarking of the GTAAAs through the Pat Niner study¹. Option 2 was a variant on Option 1 with a

1 Research to support the preparation of RSS Reviews on Gypsies and Travellers by Regional Planning Bodies, Final Report, Centre for Urban and Regional Studies, University of Birmingham, Salford Housing & Urban Studies Unit University of Salford, Centre for Regional Economic and Social Research, Sheffield Hallam University, January 2007

redistribution of numbers from those districts with the highest requirements and a minimum 15 pitches in each district. The objectives behind Option 2 were to provide greater choice to the Gypsy and Traveller community regarding locations across the Region, and to support delivery by ensuring all areas would contribute to provision of the required additional pitches. The initial appraisal determined that Option 1 was considered more sustainable because of perceived advantages of providing accommodation where the accommodation need arises.

The preferred option which EERA submitted to the Secretary of State as its Review of the RSS was based on Option 2. It varied from it in detail taking account of the GTAAs for Suffolk and Thurrock, which had subsequently become available, and through using 3 year averages for caravan counts, rather than single year figures. Why then did the assessments differ?

Firstly, we draw a distinction between the SA appraisal of Options 1 and 2 (which compared their relative performance), and the SA appraisal of the Preferred Option (which is of its performance against the base position).

Secondly SA and plan development are long-term iterative processes. The assessment of Options 1 and 2 was substantially against the numerical distribution of pitches alone, without the implementation context. The assessment of the preferred option was against a much fuller policy and evidence base, particularly in regard to how the policy was to be implemented as well as the Ormiston Trust report which reflected the results of targeted consultation with the Gypsy and Traveller communities in the region. This stronger sense of how the policy would be delivered meant that we could be more positive about its sustainability implications.

3.7

INFLUENCE OF THE SA/SEA ON THE SINGLE ISSUE REVIEW

It is required that the SA/SEA report at each stage of the Review process demonstrates how the appraisal and assessment process has influenced the development of the policy. This is set out below for the Proposed Changes stage.

The appraisal team has appraised the Secretary of State's Proposed Changes in accordance with the UK government requirements. The same appraisal criteria have been applied as were used for the previous stages of the Review. This means that the appraisal is consistent with previous stages. In addition, this appraisal benefits from the recommendations and comments of the Panel concerning key issues to be addressed at this stage.

(1)

As part of the SA/SEA process a screening assessment (Stage 1 of the Habitats Regulations Assessment) has been carried out to establish whether the Proposed Changes should be required to carry out a Habitat Regulations Assessment. The report concluded that there were no significant effects of this review on European sites¹. The report is published on Go-EAST's website.

3.9

APPRAISAL OBJECTIVES

The proposed appraisal objectives and the appraisal questions for this SA are the same as those used in the previous stages of the appraisal process.

The objectives and questions highlighted by shading are those that correspond to the requirements of the SEA Regulations.

<i>Objective</i>	<i>Criterion/ Question: Will this policy or proposal help to...</i>
1 achieve sustainable levels of prosperity and economic growth..	1.1 Generate new jobs for people in the region?
	1.2 Encourage inward investment?
	1.3 Diversify the economy, increase resilience to external shocks?
	1.4 Encourage innovation?
	1.5 Increase manufacturing?
	1.6 Encourage new business start-ups?
	1.7 Support and encourage the growth of rural business?
	1.8 Provide a satisfying job or occupation for everyone who wants one?
	1.9 Ensure everyone can afford a good standard of living?
	1.10 Reduce vulnerability to climate change, exploit any benefits?
2 (a) deliver more sustainable use of land	2.1 Develop land with least environmental/amenity value / reduce vacant buildings and derelict land? Minimise the development of Greenfield land Minimise the development of land with the most environmental, agricultural and amenity value
	2.2 Create attractive environment in built up areas? High quality of design: 'good enough to approve rather than bad enough to refuse'
	2.3 Increase access to leisure facilities (inc. woodlands, parks)? Improve the quality & quantity of publicly accessible green space Improve management of the impacts of access & recreation
	2.4 Provide opportunities for people to come into contact with and appreciate wildlife & wild places
	2.5 Minimise risk of flooding taking account of climate change? Avoid development form being located in areas at risk from coastal and fluvial flooding or storm surges, taking into account climate change. No additional flood risk from new development.
2 (b) deliver more sustainable location patterns	2.6 Reduce the need to travel?
	2.7 Reduce car reliance; encourage walking, cycle, bus, train?

(1) ¹ 'European sites' is the term used to encompass sites that have the highest level of protection in the UK either through legislation or policy. These include Special Areas of Conservation (SAC), candidate (cSAC), Special Protection Areas (SPA), proposed (pSPA) and Ramsar sites.

<i>Objective</i>	<i>Criterion / Question: Will this policy or proposal help to...</i>
	2.8 Reduce need for air travel?
	2.9 Reduce traffic congestion?
	2.10 Reduce road freight movements?
3 protect and maintain vulnerable regional assets (natural, built & historic environment) (EH)	3.1 Reduce any sources of pollution?
	3.2 Protect and enhance habitats and wildlife taking account of climate change? Avoid damage to designated sites (national and international) and protected species and achieve favourable condition.
	3.3 Maintain and enhance Biodiversity Action Plan habitats and species in line with regional targets
	3.4 Restore the full range of characteristic habitats and species to viable levels
	3.5 Protect and enhance the region's landscapes? Conserve & enhance AONBs & Broads Authority area
	3.6 Conserve & enhance regional diversity and local distinctiveness. Recognise and protect historic landscape character
	3.7 Maintain / enhance built and historic character? Ensure settlements can absorb growth without damage to character
	3.8 Protect designated and undesignated (historic) sites and areas of significance
	3.9 Limit water consumption to levels that continue to support wetland habitats. Maintain extent of wetland habitat and rivers
	3.10 Protect & enhance important coastal assets
	3.11 Improve the water quality of rivers and groundwater supplies Maintain 'good' water quality whilst accommodating new development discharge
	3.12 Achieve good air quality, especially in urban areas
4 reduce greenhouse gas emissions	4.1 Minimise need for energy?
	4.2 Increase energy efficiency?
	4.3 Increase renewable share of energy?
	4.4 Reduce need for car and road based freight transport?
5 share access to services and benefits of prosperity fairly	5.1 Reduce disparities in income levels?
	5.2 Provide more equal access to opportunities, services and facilities for all?
	5.3 Contribute to local regeneration, help deprived areas?
	5.4 Create opportunities for unemployed, ESP long term/disabled
	5.5 Increase access to decent and affordable housing?
	5.6 Encourage the provision of more locally based services and facilities?
	5.7 Retain village services?
	5.8 Help low income groups / ESP children in low income families
	5.9 Reduce crime rates?
	5.10 Promote healthy lifestyles?
	5.11 Reduce health inequalities?
	5.12 Improve ethnic / cultural mutual understanding?
	5.13 Support development of voluntary sector?
	5.14 Encourage entrepreneurial activity in disadvantaged areas?
	5.15 Encourage development of social enterprises?
	5.16 Encourage community involvement in service design and provision?
6 use natural resources	6.1 Minimise the demand for raw materials?

<i>Objective</i>	<i>Criterion / Question: Will this policy or proposal help to...</i>
efficiently; re-use, use recycled where possible	6.2 Reduce water use, maintain water security despite climate change? Limit water consumption to levels supportable by natural processes and storage systems, taking into account the impact of climate change Maintain water environment whilst meeting demand from development
	6.3 Encourage farming practices sensitive to the character of the countryside; maintain soil quality?
	6.4 Reduce minerals extracted and imported?
7 cut waste	7.1 Reduce waste generated, reuse / recycle / use recycled? Minimise production of waste
8 avoid exploiting global environment	8.1 Use materials from sustainable sources?
	8.2 Encourage local produce to be consumed in the region?
	8.3 Increase farmers markets, local trading schemes?
9 revitalise town centres to promote return to sustainable urban living	9.1 Encourage more shops, better services in town centres?
	9.2 Encourage more people to live in town centres?
	9.3 Improve access to green space? Improve the quality & quantity of publicly accessible green space?
	9.4 Reduce noise?
	9.5 Reduce fear of crime?
	9.6 Encourage a feeling of more community spirit?
	9.7 Support the economy of market towns?
	9.8 Enhance historic character, streetscape and townscape to strengthen sense of place?

3.10

REVIEW OF OTHER RELEVANT PLANS AND PROGRAMMES

This is an integral part of the requirements of a Sustainability Appraisal. It is intended to identify other plans and programmes of relevance to the plan or programme being appraised and also to identify environmental and sustainability objectives of relevance to the plan or programme and its outcomes and how these have been taken into account during its preparation.

Those plans, programmes and other documents of most relevance to the Policy Review are presented in *Annex A* of the Sustainability Appraisal Report available on the Government Office of the East of England Website.

3.11

BASELINE DATA

The collection of baseline data is a fundamental part of SA. This report sets out baseline data for a range of environmental, social and economic issues.

Information on the regional baseline is presented in *Annex B* of the Sustainability Appraisal Report available on the Government Office of the East of England Website.

4 SUSTAINABILITY APPRAISAL OF THE SINGLE ISSUE REVIEW PROPOSED CHANGES

4.1 INTRODUCTION

This section of the SA report summarises the results of the appraisal of the Secretary of State's Proposed Changes.

4.2 FINDINGS OF THE SUSTAINABILITY APPRAISAL

4.2.1 Introduction

This section of the SA presents the results of the appraisal of the Proposed Changes (including Policy H4 for Travelling Showpeople) and its supporting text as set out in the Secretary of State's Proposed Changes. The reader should refer to the Sustainability Appraisal report on EERA's website for the detailed appraisals of previous options developed during this Single Policy Review.

This appraisal has focused on the following issues:

- the likely sustainability effects of the proposed option against agreed regional sustainability objectives;
- the extent to which the proposed option requires further measures/actions to mitigate potential impacts;
- the need to provide further information regarding the delivery of the option.

4.2.2 Characteristics of the Proposed Changes

The Secretary of State's Proposed Changes are strongly based on the Panel's recommendations (*para 2.2.1* above). The Secretary of State has accepted all of the Panel's recommendations, except in regard to geographic distribution where she is proposing slightly lower pitch requirements in Epping Forest and Basildon with compensating increases in Braintree, Colchester, and East Hertfordshire, and in regard to recommendation 8.4 relating to the Regional Assembly issuing guidance on carrying out the Caravan Count. Hence the key changes are in regard to numbers and distribution of sites for Gypsies and Travellers and in requiring provision for transit sites and for Travelling Showpeople.

4.3 DETAILED APPRAISAL

The detailed SA for Policy H3 (Gypsies and Travellers) is summarised in *Table 4.1* and Policy H4 (Travelling Showpeople) is outlined in *Table 4.2*. The results of the detailed appraisal can be summarised as follows:

The SA objectives 1 and 5 on *Achieving sustainable levels of prosperity and economic growth* and on *Sharing access to services and benefits of prosperity fairly* are areas where we feel the results of the single issue review could be most significant. It is clear that a more adequate provision of pitches to address Gypsies and Travellers and Travelling Showpeoples' accommodation needs should enable more effective social and economic integration and opportunities, as well as facilitate better access to services for the target communities.

Most of the objectives are highly dependent on the detailed location, quality and affordability of pitches.

Key: ✓ = positive impacts
 × = negative impacts
 ✓/? = potentially positive impacts
 ×/? = potentially negative impacts
 ? = Unclear
 0 = Neutral/ no effect

Table 4.1 Detailed Appraisal Policy H3 – Gypsies and Travellers (Objectives in grey refer to those topics explicitly covered by the SEA Directive)

Objective	Criterion/Question: Will this policy or proposal help to...	Comments
1. Achieve sustainable levels of prosperity and economic growth.	1.1 Generate new jobs for people in the region?	N/A
	1.2 Encourage inward investment?	N/A
	1.3 Diversify the economy, increase resilience to external shocks?	N/A
	1.4 Encourage innovation?	N/A
	1.5 Increase manufacturing?	N/A
	1.6 Encourage new business start-ups?	N/A
	1.7 Support and encourage the growth of rural business?	N/A
	1.8 Provide a satisfying job or occupation for everyone who wants one?	✓ More adequate provision of pitches should enable more effective social and economic integration, including employment.
	1.9 Ensure everyone can afford a good standard of living?	✓/? Increased ability/access to a good standard of living is dependent on the detailed location/quality/affordability of pitches.
	1.10 Reduce vulnerability to climate change, exploit any benefits?	? One of the key potential impacts from climate change will be an increase in the intensity, frequency and extent of coastal and fluvial flooding. Given the high level of flood risk in much of the region, siting of pitches in Flood Zone 1 (the zone of lowest flood risk) would help to reduce vulnerability to climate change.
2. (a). deliver more sustainable use of land	2.1 Develop land with least environmental/amenity value / reduce vacant buildings and derelict land? Minimise the development of Greenfield land Minimise the development of land with the most environmental, agricultural and amenity value	? Unclear – highly dependent on local authority policies. Locations for pitches need to avoid ‘Environmental Exclusion (i.e. poor quality areas close to roads, waste sites, etc. Policy should provide better guidance on locational criteria). A positive outcome is more likely if the local authorities engage with the target communities on the design and development of the sites.
	2.2 Create attractive environment in built up areas? High quality of design: ‘good enough to approve rather than bad enough to refuse’	? Permanent sites should be designed and developed in accordance with CLG’s guidance on the Design of Gypsy and Traveller Sites. Planned sites are likely to offer environmental and social benefits greater than those associated with unplanned sites.
	2.3 Increase access to leisure facilities (inc. woodlands, parks)? Improve the quality & quantity of publicly accessible green space Improve management of the impacts of access & recreation	? Unclear from the Proposed Changes. Pitches should ensure access to leisure and recreation facilities.
	2.4 Provide opportunities for people to come into contact with and appreciate wildlife & wild places	? This depends on detailed locations of pitches, but this objective should be reflected in the final choice of locations. In LDD’s Local Authorities should explicitly exclude flood risk areas from areas of potential pitch provision.
	2.5 Minimise risk of flooding taking account of climate change? Avoid	? This depends on detailed locations of pitches but this objective should

<i>Objective</i>	<i>Criterion/Question: Will this policy or proposal help to...</i>	<i>Comments</i>	
	development from being located in areas at risk from coastal and fluvial flooding or storm surges, taking into account climate change. No additional flood risk from new development.		be reflected in the final choice of locations. PPS25 requires that residential mobile homes should be located in Flood Zone 1. This should help to minimise the risk of flooding of pitches if local authorities comply with this requirement.
2. (b). deliver more sustainable location patterns	2.6 Reduce the need to travel?	?	Pitches should be located so as to provide easy access (walking, public transport) to services and facilities.
	2.7 Reduce car reliance, encourage walking, cycle, bus, train?	?	Pitches should be located so as to provide easy access (walking, public transport) to services and facilities.
	2.8 Reduce need for air travel?		N/A
	2.9 Reduce traffic congestion?		N/A
	2.10 Reduce road freight movements?		N/A
3. protect and maintain vulnerable regional assets (natural, built & historic environment) (EH)	3.1 Reduce any sources of pollution?	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.2 Protect and enhance habitats and wildlife taking account of climate change? Avoid damage to designated sites (national and international) and protected species and achieve favourable condition.	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies. However, Local Authority HRAs and other conservation-related plans and assessments should be used to ensure the compatibility of pitch locations with conservation objectives.
	3.3 Maintain and enhance Biodiversity Action Plan habitats and species in line with regional targets	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies. However, Local Authority HRAs and other conservation-related plans and assessments should be used to ensure the compatibility of pitch locations with conservation objectives.
	3.4 Restore the full range of characteristic habitats and species to viable levels	?	In LDD's Local Authorities should explicitly exclude flood risk areas from areas of potential pitch provision..
	3.5 Protect and enhance the region's landscapes? Conserve & enhance AONBs & Broads Authority area	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.6 Conserve & enhance regional diversity and local distinctiveness. Recognise and protect historic landscape character	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.7 Maintain / enhance built and historic character? Ensure settlements can absorb growth without damage to character	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.8 Protect designated and undesignated (historic) sites and areas of significance	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.9 Limit water consumption to levels that continue to support wetland habitats. Maintain extent of wetland habitat and rivers	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.10 Protect & enhance important coastal assets	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.11 Improve the water quality of rivers and groundwater supplies Maintain 'good' water quality whilst accommodating new development	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.

Objective	Criterion / Question: Will this policy or proposal help to...	Comments	
	discharge		
	3.12 Achieve good air quality, especially in urban areas	?	Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
4. reduce greenhouse gas emissions	4.1 Minimise need for energy?	?	Any permanent buildings should be designed and constructed to meet the standards set out in the Code for Sustainable Homes. Local authorities should also ensure that such buildings comply with other relevant RSS policies such as ENG1. This will ensure a reduction in energy use and greater energy efficiency.
	4.2 Increase energy efficiency?	?	See 4.1 above
	4.3 Increase renewable share of energy?		Local Authorities should ensure that pitches have access to energy from renewable sources.
	4.4 Reduce need for car and road based freight transport?		N/A
5. share access to services and benefits of prosperity fairly	5.1 Reduce disparities in income levels?	?/✖	Not meeting need where need arises may lead to income disparities persisting. A more positive outcome could be achieved if the employment requirements of the target communities are taken into consideration. This will require proactive engagement by the local authorities with the target communities concerning pitch locations and access to sources of employment.
	5.2 Provide more equal access to opportunities, services and facilities for all?	?/✖	The Proposed Changes may offer increased access to opportunities but this will need to take account of the comments in 5.1.
	5.3 Contribute to local regeneration, help deprived areas?		N/A
	5.4 Create opportunities for unemployed, ESP long term/disabled		N/A
	5.5 Increase access to decent and affordable housing?	✓/?	Failure to deliver housing on the basis of need/location of need may not address immediate issues of access and affordability. However, the policy does recognise the need to distribute pitches in a way that supports delivery.
	5.6 Encourage the provision of more locally based services and facilities?		N/A
	5.7 Retain village services?		N/A
	5.8 Help low income groups / ESP children in low income families		N/A
	5.9 Reduce crime rates?		N/A
	5.10 Promote healthy lifestyles?	?	Healthy lifestyles will be determined by the detailed location of pitches, access to facilities and services and quality of the surrounding environment, etc.
	5.11 Reduce health inequalities?	?	The implementation of this policy needs to ensure adequate access to health services for all pitches in the region. Locations of the sites will also determine health outcomes – sites that are affected by “environmental exclusion” must be avoided.
	5.12 Improve ethnic / cultural mutual understanding?	✓/?	Successful implementation of this policy should result in the creation/ maintenance of effective mechanisms for community

Objective	Criterion / Question: Will this policy or proposal help to...	Comments
		engagement/integration.
	5.13 Support development of voluntary sector?	N/A
	5.14 Encourage entrepreneurial activity in disadvantaged areas?	N/A
	5.15 Encourage development of social enterprises?	N/A
	5.16 Encourage community involvement in service design and provision?	? Communities of Travelling Showpeople should be actively encouraged to participate in the design and provision of services associated with pitches and housing. This should be a specific feature of the implementation of this policy.
6. use natural resources efficiently; re-use, use recycled where possible	6.1 Minimise the demand for raw materials?	✓/? Some savings in the generation of construction waste will be obtained in association with the use of prefabricated mobile homes.
	6.2 Reduce water use, maintain water security despite climate change? Limit water consumption to levels supportable by natural processes and storage systems, taking into account the impact of climate change Maintain water environment whilst meeting demand from development	? Housing and pitches should be designed to be efficient in terms of water usage and water conservation. Site management plans should address water resource use in a way that assists residents conserve water resources.
	6.3 Encourage farming practices sensitive to the character of the countryside; maintain soil quality?	N/A Permanent buildings at sites should be designed and constructed in accordance with the Code for Sustainable Homes standards. They should be able to meet the standards for water efficiency set out in the RSS (Code for Sustainable Homes Level 3).
	6.4 Reduce minerals extracted and imported?	N/A
7. cut waste	7.1 Reduce waste generated, reuse / recycle / use recycled? Minimise production of waste	? Housing and pitches should be designed in ways that help to manage and reduce waste. They should encourage re-use and recycling. On-site activities that may generate wastes need to be assessed in terms of the ability to manage any waste arising effectively.
8. avoid exploiting global environment	8.1 Use materials from sustainable sources?	N/A
	8.2 Encourage local produce to be consumed in the region?	N/A
	8.3 Increase farmers markets, local trading schemes?	N/A
9. revitalise town centres to promote return to sustainable urban living	9.1 Encourage more shops, better services in town centres?	N/A
	9.2 Encourage more people to live in town centres?	? It is unclear how effective this policy will be in encouraging local authorities to consider the need/demand for town centre housing of the target communities.
	9.3 Improve access to green space? Improve the quality & quantity of publicly accessible green space?	? Ensuring acceptable access to green space is entirely dependent on pitch locations. Pitches should be located in areas with access to green space.
	9.4 Reduce noise?	N/A
	9.5 Reduce fear of crime?	N/A
	9.6 Encourage a feeling of more community spirit?	✓/? Successful implementation of this policy should result in improved community integration.
	9.7 Support the economy of market towns?	N/A

<i>Objective</i>	<i>Criterion / Question: Will this policy or proposal help to...</i>	<i>Comments</i>
	9.8 Enhance historic character, streetscape and townscape to strengthen sense of place?	N/A

Table 4.2 Detailed Appraisal Policy H4 – Travelling Showpeople (Objectives in grey refer to those topics explicitly covered by the SEA Directive)

<i>Objective</i>	<i>Criterion / Question: Will this policy or proposal help to...</i>	<i>Comments</i>	
1. Achieve sustainable levels of prosperity and economic growth.	1.1 Generate new jobs for people in the region?	N/A	
	1.2 Encourage inward investment?	N/A	
	1.3 Diversify the economy, increase resilience to external shocks?	N/A	
	1.4 Encourage innovation?	N/A	
	1.5 Increase manufacturing?	N/A	
	1.6 Encourage new business start-ups?	N/A	
	1.7 Support and encourage the growth of rural business?	N/A	
	1.8 Provide a satisfying job or occupation for everyone who wants one?	✓	More adequate provision of pitches should enable more effective social and economic integration, including employment.
	1.9 Ensure everyone can afford a good standard of living?	✓/?	Increased ability/access to a good standard of living is dependent on the detailed location/quality/affordability of pitches.
	1.10 Reduce vulnerability to climate change, exploit any benefits?	?	One of the key potential impacts from climate change will be an increase in the intensity, frequency and extent of coastal and fluvial flooding. Given the high level of flood risk in much of the region, siting of pitches in Flood Zone 1 (the zone of lowest flood risk) would help to reduce vulnerability to climate change.
2. (a). deliver more sustainable use of land	2.1 Develop land with least environmental/amenity value / reduce vacant buildings and derelict land? Minimise the development of Greenfield land Minimise the development of land with the most environmental, agricultural and amenity value	?	Unclear – highly dependent on local authority policies. Locations for pitches need to avoid ‘Environmental Exclusion (i.e. poor quality areas close to major roads, waste sites, etc. Policy should provide better guidance on locational criteria). A positive outcome is more likely if the local authorities engage with Travelling Showpeople on the design and development of the sites.
	2.2 Create attractive environment in built up areas? High quality of design: ‘good enough to approve rather than bad enough to refuse’	✓/?	Permanent sites should be designed and developed in accordance with CLG’s guidance on the Design of Gypsy and Traveller Sites. They should also be designed to take explicit account of the needs of Travelling Showpeople i.e. in terms of the need to provide storage space for equipment. Planned sites are likely to offer environmental and social benefits greater than those associated with unplanned sites.
	2.3 Increase access to leisure facilities (inc. woodlands, parks)? Improve	?	Unclear from the Proposed Changes. Pitches should ensure access to

Objective	Criterion / Question: Will this policy or proposal help to...	Comments
	the quality & quantity of publicly accessible green space Improve management of the impacts of access & recreation	leisure and recreation facilities.
	2.4 Provide opportunities for people to come into contact with and appreciate wildlife & wild places	? This depends on detailed locations of pitches, but this objective should be reflected in the final choice of locations. In LDD's Local Authorities should explicitly exclude flood risk areas from areas of potential pitch provision.
	2.5 Minimise risk of flooding taking account of climate change? Avoid development from being located in areas at risk from coastal and fluvial flooding or storm surges, taking into account climate change. No additional flood risk from new development.	? This depends on detailed locations of pitches but this objective should be reflected in the final choice of locations. PPS25 requires that residential mobile homes should be located in Flood Zone 1. This should help to minimise the risk of flooding of pitches if local authorities comply with this requirement.
2. (b). deliver more sustainable location patterns	2.6 Reduce the need to travel?	? Pitches should be located so as to provide easy access (walking, public transport) to services and facilities and the equipment necessary ⁷ for the livelihoods of Travelling Showpeople.
	2.7 Reduce car reliance, encourage walking, cycle, bus, train?	? Pitches should be located so as to provide easy access (walking, public transport) to services and facilities and the equipment necessary ⁷ for the livelihoods of Travelling Showpeople.
	2.8 Reduce need for air travel?	N/A
	2.9 Reduce traffic congestion?	N/A
	2.10 Reduce road freight movements?	N/A
3. protect and maintain vulnerable regional assets (natural, built & historic environment)	3.1 Reduce any sources of pollution?	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.2 Protect and enhance habitats and wildlife taking account of climate change? Avoid damage to designated sites (national and international) and protected species and achieve favourable condition.	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies. However, Local Authority HRAs and other conservation-related plans and assessments should be used to ensure the compatibility of pitch locations with conservation objectives.
	3.3 Maintain and enhance Biodiversity Action Plan habitats and species in line with regional targets	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies. However, Local Authority HRAs and other conservation-related plans and assessments should be used to ensure the compatibility of pitch locations with conservation objectives.
	3.4 Restore the full range of characteristic habitats and species to viable levels	? In LDD's Local Authorities should explicitly exclude flood risk areas from areas of potential pitch provision..
	3.5 Protect and enhance the region's landscapes? Conserve & enhance AONBs & Broads Authority area	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.6 Conserve & enhance regional diversity and local distinctiveness. Recognise and protect historic landscape character	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.7 Maintain / enhance built and historic character? Ensure settlements	? Impact will be entirely dependent on the characteristics of individual

Objective	Criterion/Question: Will this policy or proposal help to...	Comments
	can absorb growth without damage to character	locations and local authority policies.
	3.8 Protect designated and undesignated (historic) sites and areas of significance	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.9 Limit water consumption to levels that continue to support wetland habitats. Maintain extent of wetland habitat and rivers	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.10 Protect & enhance important coastal assets	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.11 Improve the water quality of rivers and groundwater supplies Maintain 'good' water quality whilst accommodating new development discharge	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
	3.12 Achieve good air quality, especially in urban areas	? Impact will be entirely dependent on the characteristics of individual locations and local authority policies.
4. reduce greenhouse gas emissions	4.1 Minimise need for energy?	? Any permanent buildings should be designed and constructed to meet the standards set out in the Code for Sustainable Homes. Local authorities should also ensure that such buildings comply with other relevant RSS policies such as ENG1. This will ensure a reduction in energy use and greater energy efficiency.
	4.2 Increase energy efficiency?	? See 4.1 above
	4.3 Increase renewable share of energy?	Local Authorities should ensure that pitches have access to energy from renewable sources.
	4.4 Reduce need for car and road based freight transport?	N/A
5. share access to services and benefits of prosperity fairly	5.1 Reduce disparities in income levels?	?/✘ Not meeting need where need arises may lead to income disparities persisting. A more positive outcome could be achieved if the employment requirements of Travelling Showpeople are taken into consideration. This will require proactive engagement by the local authorities with Travelling Showpeople concerning pitch locations and facilities and access to sources of employment.
	5.2 Provide more equal access to opportunities, services and facilities for all?	?/✘ The Proposed Changes may offer increased access to opportunities but this will need to take account of the comments in 5.1.
	5.3 Contribute to local regeneration, help deprived areas?	N/A
	5.4 Create opportunities for unemployed, ESP long term/disabled	N/A
	5.5 Increase access to decent and affordable housing?	✓/? Failure to deliver housing on the basis of need/location of need may not address immediate issues of access and affordability. However, the development of a specific policy addressing the needs of Travelling Showpeople should provide the basis for more effective provision of accommodation.
	5.6 Encourage the provision of more locally based services and facilities?	N/A
	5.7 Retain village services?	N/A
	5.8 Help low income groups / ESP children in low income families	N/A

Objective	Criterion / Question: Will this policy or proposal help to...	Comments
	5.9 Reduce crime rates?	N/A
	5.10 Promote healthy lifestyles?	? Healthy lifestyles will be determined by the detailed location of pitches, access to facilities and services and quality of the surrounding environment, etc.
	5.11 Reduce health inequalities?	? The implementation of this policy needs to ensure adequate access to health services for all pitches in the region. Locations of the sites will also determine health outcomes – sites that are affected by “environmental exclusion” must be avoided.
	5.12 Improve ethnic / cultural mutual understanding?	✓/? Successful implementation of this policy should result in the creation/maintenance of effective mechanisms for community engagement/integration.
	5.13 Support development of voluntary sector?	N/A
	5.14 Encourage entrepreneurial activity in disadvantaged areas?	N/A
	5.15 Encourage development of social enterprises?	N/A
	5.16 Encourage community involvement in service design and provision?	? The Travelling Showpeople communities should be actively encouraged to participate in the design and provision of services associated with pitches and housing. It is not clear that this will be a feature of this policy.
6. use natural resources efficiently; re-use, use recycled where possible	6.1 Minimise the demand for raw materials?	✓/? Some savings in the generation of construction waste will be obtained in association with the use of prefabricated mobile homes.
	6.2 Reduce water use, maintain water security despite climate change? Limit water consumption to levels supportable by natural processes and storage systems, taking into account the impact of climate change Maintain water environment whilst meeting demand from development	? Housing and pitches should be designed to be efficient in terms of water usage and water conservation. Site management plans should address water resource use in a way that assists residents conserve water resources. Permanent buildings at sites should be designed and constructed in accordance with the Code for Sustainable Homes standards. They should be able to meet the standards for water efficiency set out in the RSS (Code for Sustainable Homes Level 3).
	6.3 Encourage farming practices sensitive to the character of the countryside; maintain soil quality?	N/A
	6.4 Reduce minerals extracted and imported?	N/A
7. cut waste	7.1 Reduce waste generated, reuse / recycle / use recycled? Minimise production of waste	? Housing and pitches should be designed in ways that help to manage and reduce waste. They should encourage re-use and recycling. On-site activities that may generate wastes need to be assessed in terms of the ability to manage any waste arising effectively.
8. avoid exploiting global environment	8.1 Use materials from sustainable sources?	N/A
	8.2 Encourage local produce to be consumed in the region?	N/A
	8.3 Increase farmers markets, local trading schemes?	N/A
9. revitalise	9.1 Encourage more shops, better services in town centres?	N/A

<i>Objective</i>	<i>Criterion/Question: Will this policy or proposal help to...</i>	<i>Comments</i>	
town centres to promote return to sustainable urban living	9.2 Encourage more people to live in town centres?	?	It is unclear how effective this policy will be in encouraging local authorities to consider the need/demand for town centre housing of the target communities.
	9.3 Improve access to green space? Improve the quality & quantity of publicly accessible green space?	?	Ensuring acceptable access to green space is entirely dependent on pitch locations. Pitches should be located in areas with access to green space.
	9.4 Reduce noise?		N/A
	9.5 Reduce fear of crime?		N/A
	9.6 Encourage a feeling of more community spirit?	✓/?	Successful implementation of this policy should result in improved community integration.
	9.7 Support the economy of market towns?		N/A
	9.8 Enhance historic character, streetscape and townscape to strengthen sense of place?		N/A

5 *IMPLEMENTATION AND MONITORING*

5.1 *INTRODUCTION*

This RSS Review will be accompanied by an Implementation Plan, which is being developed by EERA. It is envisaged that implementation and monitoring actions covering this policy will be included in that Plan

5.2 *IMPLEMENTATION AND MONITORING ACTIONS*

This appraisal recommends that clear and robust implementation and monitoring actions are developed to ensure that this policy is implemented in a timely fashion that meets the needs of target communities.

Implementation planning also needs to take account of key environmental issues within the region such as flood risk and impacts on Natura 2000 and other designated sites.

The Implementation Plan of the RSS should contain specific actions and indicators that will allow for reporting on this policy in the Annual Monitoring Report.

6 *APPRAISAL OF THE CUMULATIVE EFFECTS OF THE SECRETARY OF STATE'S PROPOSED CHANGES*

6.1 *INTRODUCTION*

The SA team has, in accordance with the requirements of the SEA Directive, the Regulations and Government guidance, carried out an assessment of the likely cumulative impacts of the implementation of Single Issue Review. This has included an assessment of potential secondary impacts and synergistic effects.

The conclusion of the SA is that the additional cumulative effects of the Secretary of State's Proposed Changes (in comparison to the Draft RSS) are small since the increment of additional growth is relatively minor in comparison with the level of growth proposed in the Draft Gypsy and Traveller RSS Review and because Gypsy and Traveller pitches and plots for Travelling Showpeople contribute towards, rather than being additional to regional housing requirements.

6.2 *CUMULATIVE EFFECTS OF THE SECRETARY OF STATE'S PROPOSED CHANGES*

The lack of detailed locational information on likely sites means that it is difficult to assess cumulative effects at regional level. The number of pitches required is not in itself significant since provision for Gypsies and Travellers and Travelling Showpeople contribute towards overall housing requirements. However, it will still be necessary to assess potential impacts at local level once more detailed locational information is available.

7 *APPRAISAL OF THE SIGNIFICANT EFFECTS OF THE SECRETARY OF STATE'S PROPOSED CHANGES*

7.1 *INTRODUCTION*

The SEA Directive and Regulations require that an assessment is made of the likely significant effects on the environment. A consideration of the effects of the Proposed Changes on the environment is clearly very much a part of the overarching SA off the East of England RSS ⁽¹⁾. For clarity and to show compliance with the SEA Directive and Regulations, the likely significant effects on the environment arising from the Single Issue Review have been drawn out and reported in this section.

7.2 *LIKELY SIGNIFICANT EFFECTS OF THE SECRETARY OF STATE'S PROPOSED CHANGES*

It is the conclusion of the SA that the level of growth proposed in the Proposed Changes to the policies addressing the provision of Gypsies and Travellers' accommodation will not lead to regional scale significant effects beyond those identified by the SA of the East of England Plan. This is because Gypsy and Traveller pitches and plots for Travelling Showpeople contribute towards, rather than being additional to regional housing requirements. Any potential significant effects will be highly localised and dependent on the locational decisions taken by Local Authorities. Sustainability Appraisals and HRAs of Local Authority plans should enable such effects to be avoided.

7.3 *MITIGATION*

The appraisal has not identified any mitigation measures that need to be applied at regional scale. This does not preclude that such measures may be required as a result of local authorities assessments of pitch provision at local level with regard to issues such as flooding, nature conservation etc. The need to apply mitigation measures needs to be assessed at local level at the appropriate stage in the process. The need for mitigation measures will need to be carefully assessed at specific potential pitch locations.

As requested by the Panel, the SA of the Proposed Changes has looked at potential mitigation options (see *Box 7.1*). Three mitigation measures have been identified in *Table 7.1* for the potentially negative impacts identified in the SA.

(1) The SA for the East of England Plan can be found at: <http://www.eera.gov.uk>

Box 7.1

Mitigation request from Panel Report

Any further SA should also consider whether there are any mitigation measures that can be identified to reduce the risks of the Policy on the remaining three objectives against which potentially negative impacts were recorded.

Table 7.1 *Potentially negative impacts recorded and potential mitigation*

Objective / question	Outcome	Impact / Reason	Potential Mitigation
5.1 Reduce disparities in income levels?	?/✖	Not meeting need where need arises may lead to income disparities persisting.	Not meeting need where need arises may lead to income disparities persisting. A more positive outcome could be achieved if the employment requirements of the target communities are taken into consideration. This will require proactive engagement by the local authorities with the target communities concerning pitch and plot design and provision. The need for engagement is recognised in the Proposed Changes.
5.2 Provide more equal access to opportunities, services and facilities for all?	?/✖	This option has the potential to be less than Option 1 due to its more dispersed/diffuse approach to tackling community issues.	The Proposed Changes may offer increased access to opportunities but this will need to take account of the comments in 5.1.
5.5 Increase access to decent and affordable housing?	?/✖	Failure to deliver housing on the basis of need/location of need may not address immediate issues of access and affordability. The policy needs to make more explicit reference to appropriate delivery mechanisms for provision of pitches and housing for Gypsies and Travellers.	Implementation of the policy will require proactive engagement with the target communities by local authorities. In addition, both policies recognise the need for proposed distributions of housing to be influenced by the ability to deliver the desired level of provision. This is likely to make the provision of housing more effective. This is reflected in the revised appraisal of this objective in this appraisal of the Proposed Changes.

7.4

SIGNIFICANT EFFECT INDICATORS AND MONITORING

Appropriate indicators should be developed to assess the implementation of this Single Issue Review.

Many key areas of sustainability cannot be assessed at regional level for the Proposed Changes because of the lack of locationally specific information on which to base an assessment of impact. Overall, given the limited numbers of dwellings involved, it appears that regional scale impacts on the environment will not be significant.

The Policy incorporating the Proposed Changes does, however, raise a number of key sustainability issues in terms of their ability to meet the current and future needs and aspirations of the target communities. These relate in particular to the deliverability of the proposed policy and the evidence base from which the policy has been developed. GO East is aware of deficiencies and inconsistencies of the evidence base. It is important that these are addressed going forward so that the delivery of the policy contributes to the effective provision of housing for the target communities and avoids unnecessary negative impacts.

Involvement of the target communities in the implementation of this policy will improve its effectiveness. This will require proactive engagement by local authorities.