

Revision Schedule

Draft SA Report

April 2008

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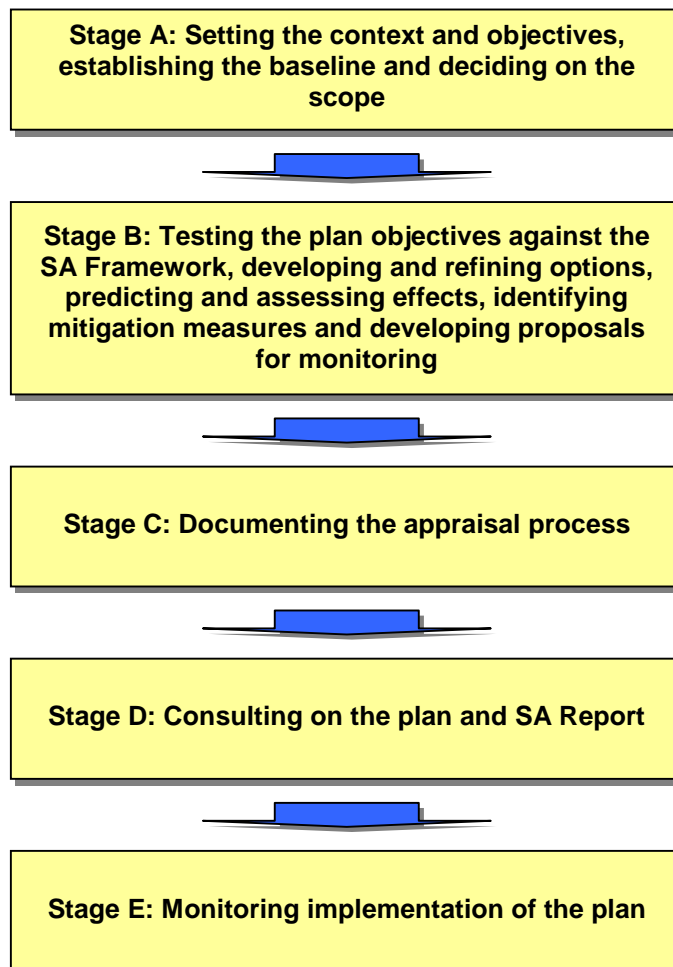
1 Non-Technical Summary

1.1 Introduction

- 1.1.1 The emerging South East Plan is the Regional Spatial Strategy (RSS) that will set the changes needed to improve quality of life in the South East of England over the next 20 years (up to 2026). The emerging South East Plan was first presented in draft form in 2005, and it is expected that the final plan will receive Government approval in 2008. In March 2006, new regulations set out the need to include information on the number of Gypsy and Traveller pitches required in the region. It was not possible to include this data before the Plan submission deadline, and therefore a partial review of the plan has been launched to cover this issue.
- 1.1.2 SA involves identifying and evaluating a plan's impacts on the community, the environment and the economy – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing negative effects and maximising positive effects. The findings of SA should be reflected in the adopted document to help ensure that it maximises its contribution to future sustainability. Importantly, the SA process incorporates the requirements of European legislation which requires that spatial and land use plans undergo a Strategic Environmental Assessment (SEA)¹. Independent consultants Scott Wilson have been commissioned to undertake the SA – incorporating SEA – of the Gypsy, Traveller and Showpeople Single Issue Review, the findings of which are documented in this report.
- 1.1.3 Government guidance advocates a five-stage approach to undertaking SA – see Figure 1.1.

¹ SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans or programmes on the environment

Figure 1.1: Five-stage approach to SA



- 1.1.4 Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which each LDD can be assessed – together with the evidence base (collated from a review of baseline data and sustainability context documents) that will help to inform the appraisal. The framework and evidence base are documented in a Scoping Report, compiled in September 2006. This was subject to consultation and is available on the SEERA website². Following publication of the Scoping Report some additional scoping information was collected by Scott Wilson and presented in a separate document, which was also drawn upon to inform this assessment.
- 1.1.5 Stage B of the SA process involves the main body of appraisal work. With respect to the Single Issue Review, at this stage the work involves assessing the various plan options generated by SEERA. The appraisal of options – or alternatives – is a key part of the plan preparation process and a legal requirement under SEA legislation. For each option, the SA assesses the potential economic, social and environmental implications. This report has been prepared to help demonstrate that sustainability considerations have been incorporated into the choice of preferred option, and to provide information for stakeholders so that are able to more effectively comment on why they might favour one option or another during the consultation on the options.

² Please see: http://www.southeast-ra.gov.uk/southeastplan/consultation/gt_update.html

1.2 The Options

Option A

- 1.2.1 Option A sets out the distribution of new Gypsy and Traveller pitches required to meet identified need in each local authority. Need was identified as a result of county and local authority Gypsy and Traveller accommodation assessments. In total Option A proposed a regional total of **1347** additional pitches.

Option B

- 1.2.2 Whilst Option B meets the estimated need for the South East region, with a total provision of **1350** pitches, it proposes a revised distribution of these pitches between some local authority areas. However, total pitch provision by county remains broadly the same as that for Option A.

Option C

- 1.2.3 Option C promotes a similar total number of pitches as Option A and B (**1355**), but proposes a revised distribution of pitches between counties as well as local authorities. The largest increases are noted within Hampshire and the Isle of White and Oxfordshire. The counties of Kent, Surrey and West Sussex would see the largest decreases in pitch provision (from Option A) in this option.

Option D

- 1.2.4 Finally a further Option has been proposed (Option D). The pattern of distribution reflects that of Option C, with proposed changes to the same counties and local authority areas. However, the actual change in figures from Option A does not represent peaks as large as that for Option C. The effects associated with Option D will be identical to those associated with Option C, but of lower magnitude. As a result Option D has not been assessed individually, but instead, in the instances where the assessment found Option C to have a significant effect, consideration has been given to whether the effect would be the same for Option D.

1.3 Summary of appraisal findings

- 1.3.1 Table 1.1 shows a very broad overview of the appraisal findings. In the table, effects against the SA Objectives are categorised according to the key set out in Table 1.2. It is important to note that effects for Options B and C were assessed according to the degree to which they differ from the effects predicted for Option A, rather than being assessed on a stand-alone basis (according to how the option will result in changes from baseline conditions). See Section 5 for further discussion of this approach.
- 1.3.2 The effects associated with Option D will be identical to those associated with Option C, but of lower magnitude. As a result Option D has not been assessed individually, but it is safe to assume that Option D will result in the following:
- Crime – effects are predicted to be of a similar magnitude and significance to those predicted for Options B and C
 - Housing and maintenance of vibrant communities – effects will be the same as those predicted for Option C, but perhaps of a slightly lower magnitude.

Table 1.1: A broad summary of the assessment findings

SA Objective	Option A	Option B*	Option C*
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Green	Orange	Orange
To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment	Light Green	Grey	Grey
To improve the health and well-being of the population and reduce inequalities in health	Green	Grey	Grey
To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region	Green	Grey	Grey
To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work	Green	Grey	Grey
To reduce crime and the fear of crime	Green	Orange	Orange
To create and sustain vibrant communities	Light Green	Orange	Orange
To improve accessibility to all services and facilities	Green	Grey	Grey
To encourage increased engagement in cultural activity across all sections of the community in the South East	Light Green	Grey	Grey
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance	Green	Grey	Grey

To conserve and enhance the region's biodiversity			
To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment			
To reduce waste generation and disposal and achieve the sustainable management of waste			
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region			

* Note that effects for Options B and C were assessed according to the degree to which they differ from the effects predicted for Option A, rather than being assessed on a stand-alone basis (according to how the option will result in changes from baseline conditions). See Section 5 for further discussion of this approach.

Table 1.2: Significance classifications

Significance classification	Meaning
	Option will result in a significant positive impact on the SA Objective
	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts
	Neutral or negligible effect
	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts
	Option will result in a significant negative impact on the SA Objective
	The relationship between the Option and the SA Objective is unknown, or there is not enough information to make an assessment.

- 1.3.3 Where the assessment highlighted the potential for negative sustainability effects associated with the implementation of an option, the appraisal has put forward recommendations to mitigate the negative effects. Table 1.3 lists the recommendations measures that will be important to consider as part of the development and implementation of Option A, whilst Table 1.4 lists the recommendations relating to Options B, C and D.

Table 1.3: Mitigation measures and recommendations identified by the assessment of Option A

- It will be important to ensure that additional pitches do not worsen conditions on existing sites
- Supporting Policy for the allocations can be used to help deliver sustainable construction for the implementation of pitch provision.

Table 1.4: Mitigation measures and recommendations identified by the assessment of Options B, C and D

- Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.
- Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).
- Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.
- A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.

1.4 Conclusions

- 1.4.1 Because of the strategic nature of the assessment and a lack of sufficient evidence the strongest conclusions reached by the assessment related to the effects on the Gypsy and Traveller community of **meeting identified need** (Option A) and **diverging from identified need** (Options B and C). There has been less of an emphasis on assessing the effects of the specific allocations promoted by each Option. In effect, the approach taken in the assessment has been to assess Option A (meeting identified need) and then to consider whether Options B and C (diverging from identified need) will have significantly different effects against each Sustainability Objective than was the case for Option A.

- 1.4.2 Meeting identified need (Option A) has been found to result in wide ranging benefits. Many of the predicted benefits rely heavily on the assumption that meeting identified need will reduce the number of **unauthorised pitches**. Unauthorised pitches are not regulated or planned and can have a number of adverse effects which can lead to problems for both the travelling and settled

communities and lead to increased tensions and reduced potential for integration between the two communities.

- 1.4.3 **Permanent authorised pitches** can allow for the provision of the facilities and infrastructure required to support decent living conditions, such as power and water supplies, toilet and shower facilities, and facilities for animals. Other benefits of well located pitches and sites will include the potential for proximity to employment opportunities to be a consideration and the potential for waste management to be better addressed. Another important point is that provision of pitches will allow many Gypsies and Travellers to have a permanent address, which could also result in wide ranging benefits, for example, allowing Gypsies and Travellers to access education, healthcare and employment.
- 1.4.4 Importantly, authorised pitches are less likely to negatively affect **the receiving environment and population**, with fewer impacts on local communities and economies as well as biodiversity, landscape and the historic environment. Well located pitches should also have less potential to result in fear of crime, although this effect is not certain. Lessening conflicts between the travelling and settled communities will help to reduce the barriers that currently prevent Gypsies and Travellers from accessing services and facilities and education and can also help to promote understanding and integration.
- 1.4.5 The sustainability effects of meeting identified need are broadly positive. It is likely that the most significant benefits will be those experienced by Gypsy and Travellers. Benefits experienced by the settled community can be significant, but will be more localised in scale. Environmental benefits will be localised and in many cases be minor.
- 1.4.6 **Options B and C** have the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. However, effects are somewhat uncertain as in many instances delivery of a level of pitches below identified need in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority or county. There is greater potential for negative effects as a result of Option C as a result of it promoting divergence from identified need at a greater spatial scale (i.e. Gypsies and Travellers may be forced to live further from their preferred location). As well as possibly preventing some Gypsies and Travellers from meeting their housing need (in an area where they want to live), there is also the potential for the development and maintenance of vibrant Gypsy and Traveller communities to be hindered.
- 1.4.7 Furthermore, in terms of meeting health and education needs and ensuring that Gypsies and Travellers can be lifted out of poverty, there is some potential for poor existing baseline conditions for a local authority to indicate that there could be significant constraints on the ability of new pitches to be brought forward in a sustainable fashion. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives.
- 1.4.8 In most cases, the assessment was **unable to draw strong conclusions** regarding how the redistribution promoted by Options B and C would impact upon the receiving environments, communities and economies. The reasons for this are twofold:
1. The options are **strategic in nature** and there is insufficient evidence to base any judgment on. For example, it is not possible to conclude that biodiversity effects will be improved if fewer pitches are allocated to authorities with Natura 2000 sites because all we know is whether Natura 2000 sites are present, and not the

number/area of sites or their sensitivity. Furthermore, it is questionable whether this indicator could ever be a comprehensive way to identify overall biodiversity impact, even if we had complete information regarding the number, area and sensitivity of Natura 2000 sites for each authority.

2. It is very difficult to conclude that an increase in pitches allocated to a local authority will have negative effects on the receiving environment or population if it is assumed that this will result in **less local potential for unauthorised sites**. Throughout the assessment we have worked from the assumption that unauthorised sites are associated with a range of negative effects for the receiving environment and population (as well as the Gypsy and Traveller community), but authorised sites have the potential to reduce these negative effects (as well as benefit the Gypsy and Traveller community) as a result of being well sited and well planned for.

- 1.4.9 There was one exception to this rule. It was considered that **baseline crime statistics** at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of **fear of crime** at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

2 How to Comment on this Report

Please see the Assembly website: <http://www.southeast-ra.gov.uk/consultations.html>

3 Introduction

3.1 The Gypsy and Traveller Single Issue Review of the South East Plan

- 3.1.1 The emerging South East Plan is the Regional Spatial Strategy (RSS) that will set the changes needed to improve quality of life in the South East England region over the next 20 years (up to 2026). The Plan is the first for the region under the new style of spatial planning introduced by the Planning and Compulsory Purchase Act 2004 and replaces the existing Regional Planning Guidance 9 (RPG9) and County Structure Plans. This will set the context for the Local Development Frameworks (LDFs) currently being prepared by all local authorities in the region.
- 3.1.2 In early 2005 the draft South East Plan, prepared by the South East Regional Assembly (SEERA) went out for public consultation. Following this, the Plan was submitted to Government on 31 March 2006, at which point began another period of consultation, running from 31 March - 23 June 2006. This was then followed by an Examination in Public, which ran between November 2006 and March 2007. The purpose of the Examination in Public was to consider the 7,000 responses to the draft Plan made by more than 350 separate individuals and organisations. The Report of the Examination in Public Independent Panel was published on 29 August 2007. It is expected that the final plan will receive Government approval in 2008.
- 3.1.3 In March 2006, new regulations set out the need to include information on the number of Gypsy and Traveller pitches required in the region. It was not possible to include this data before the Plan submission deadline, and therefore a partial review of the plan has been launched to cover this issue.
- 3.1.4 This Sustainability Appraisal details the assessment of the options under consideration in the development of the Single Issue Review.

3.2 Sustainability Appraisal

- 3.2.1 The Single Issue Review must be subject to a Sustainability Appraisal (SA). SA involves identifying and evaluating a plan's impacts on the community, the environment and the economy – the three dimensions of sustainable development. It also suggests ways of avoiding or reducing negative effects and maximising positive effects. The findings of SA should be reflected in the adopted document to help ensure that it maximises its contribution to future sustainability.
- 3.2.2 Importantly, the SA process incorporates the requirements of European legislation which requires that spatial and land use plans undergo a Strategic Environmental Assessment (SEA)³. This document indicates clearly where the requirements of this legislation – the 'SEA Directive' - have been addressed. The Report forms the 'Environmental Report' as required by the SEA Directive. Table 3.1 also provides an indication of where the information required by the Directive for inclusion in the 'Environmental Report' can be found.

³ SEA involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU legislated for SEA with the adoption of Directive 2001/42/EC on the assessment of the effects of certain plans or programmes on the environment

3.2.3 Independent consultants Scott Wilson have been commissioned to undertake the SA – incorporating SEA – of the Gypsy, Traveller and Showpeople Single Issue Review. This report sets out the consultants’ appraisal of the options under consideration. The appraisal of options – or alternatives – is a key part of the plan preparation process and a legal requirement under SEA legislation.

Table 3.1: SEA Directive requirements checklist

Environmental Report requirements ⁴	Relevant report
1. an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Sections 3, 4 and Appendix 2
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 4 and Scoping Report
3. the environmental characteristics of areas likely to be significantly affected;	Section 4 and Scoping Report
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 4 and Scoping Report
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 4 and Scoping Report
6. the likely significant effects ⁵ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 6, 7 and Appendix 1
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 6
8. an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 5

⁴ certain plans and programmes on the environment (the ‘SEA Directive’). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Development Frameworks (LDFs).

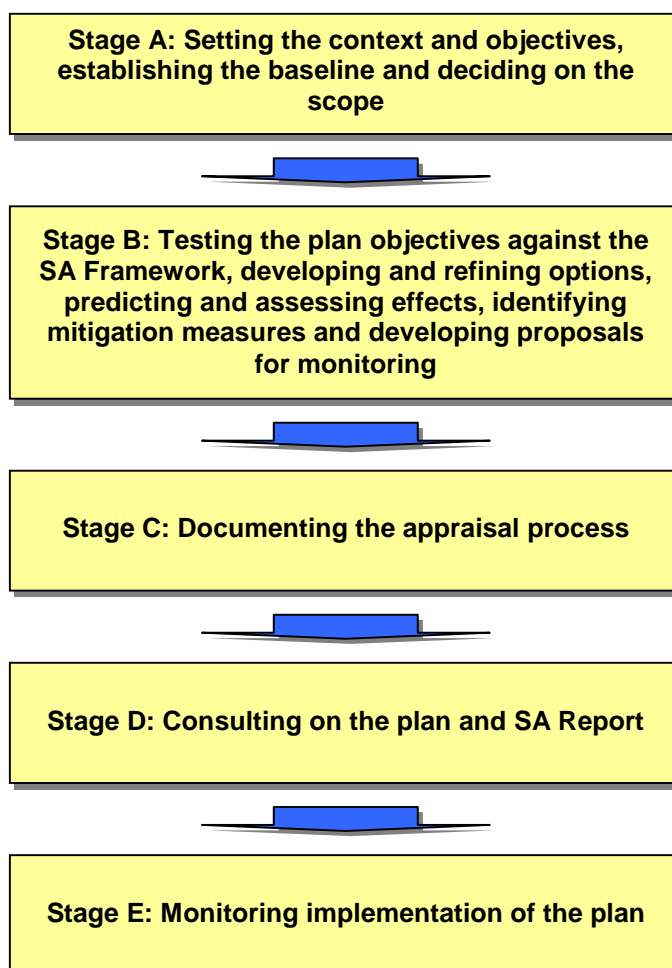
⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Environmental Report requirements ⁴	Relevant report
9. a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 6
10. a non-technical summary of the information provided under the above headings.	Section 1

3.3 The SA Process

3.3.1 In November 2005 the Government published guidance⁶ on applying SA to Regional Spatial Strategies so that SA incorporates the requirements of the SEA Directive ('the Guidance'). This guidance advocates a five-stage approach to undertaking SA – see Figure 3.1:

Figure 3.1: Five-stage approach to SA



⁶ ODPM (2005). Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

- 3.3.2 Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which each LDD can be assessed – together with the evidence base (collated from a review of baseline data and sustainability context documents) that will help to inform the appraisal. The framework and evidence base are documented in a Scoping Report, compiled in September 2006. This was subject to consultation and is available on the SEERA website. Following publication of the Scoping Report some additional scoping information was collected by Scott Wilson and presented in a separate document, which was also drawn upon to inform this assessment.
- 3.3.3 Stage B in the SA process involves the main body of appraisal work. With respect to the Single Issue Review, at this stage the work involves assessing the various options generated by SEERA. As a starting point for the development of the options the sub regional Gypsy and Traveller accommodation assessments were taken into consideration. This report documents the appraisal of the options and summarises their potential economic, social and environmental implications. This report has been prepared to help demonstrate that sustainability considerations have been incorporated into the choice of preferred option, and to provide information for stakeholders so that are able to more effectively comment on why they might favour one option or another during the consultation on the options.

3.4 What Happens Next?

- 3.4.1 The draft versions of the Single Issue Review and SA document will be published for public consultation between 1 September 2008 and 21 November 2008. Following this consultation responses will be considered by SEERA and changes made to the plan as necessary. Any significant changes to the plan following consultation will undergo a further Sustainability Appraisal.

3.5 Report structure

- 3.5.1 The remainder of this report is structured as follows:
- Section 4 – Summarises the relevant findings from Stage A of the SA process
 - Section 5 – Sets out the appraisal methodology
 - Section 6 – Summarises the findings of the options appraisal
 - Section 7 – Draws some conclusions on the appraisal

4 Evidence Base and SA Framework

4.1 Introduction

- 4.1.1 Stage A of the SA process involved gathering evidence regarding the sustainability baseline and sustainability context in the South East that is relevant to the SA of the Single Issue Review. This evidence was used to develop a set of Sustainability Objectives against which the sustainability effects of the plan can be assessed. Together, the set of Sustainability Objectives form the 'framework' that will be used to structure the assessment stage. A related aim of the evidence gathering stage is to gather information about the current and likely future baseline situation in order to aid the assessment of effects against the SA Framework.
- 4.1.2 The SA Framework and evidence base for the SA of the Single Issue Review are documented in a Scoping Report, which was completed in September 2006. Following production of the Scoping Report, Scott Wilson compiled some further evidence, which was published in a report in November 2007.

4.2 Policy and sustainability context (A1)

- 4.2.1 The requirement to undertake a context review arises from the SEA Directive:

The 'Environmental Report' required under the SEA Directive should include:

"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" and "the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme"

(Annex 1 (a) and (e) of the SEA Directive

- 4.2.2 The Plans, Programmes, Policies and Initiatives (PPPSIs) that are relevant to the plan were reviewed and the key objectives that need to be taken account during the sustainability appraisal of the plan noted. Table 4.1 lists the PPPSIs that were reviewed in the SEERA Scoping Report (September, 2006) and the document of further scoping information (November, 2007).

Table 4.1: Additional relevant policies, plans, programmes, strategies and initiatives

Housing Act (1996)
Homelessness Act (2002)
Housing Act 2004
The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006
Planning and Compulsory Purchase Act (2004)
Planning for Gypsy and Traveller Caravan Sites - Circular 01/2006
Planning for Travelling Showpeople, 2007

Race Relations Act (1976) and Race Relations (Amendment) Act (2000)
Human Rights Act (1998)
PPS 1 <i>Planning for Sustainable Development</i> (2005)
Draft Guidance on the Design of sites for Gypsies and Travellers, Consultation Paper 2007
PPS7: Sustainable Development in Rural Areas
Planning Policy Statement 3, Housing, CLG, 2007
Planning for a sustainable Future: The Planning White Paper, 2006
The Housing Green Paper: Homes for the Future: More Affordable, More Sustainable Housing Green Paper, 2007
Planning Policy 25 Strategic Flood Risk Assessment
Thames Basin Heath SPA Draft Interim Strategic Delivery Plan, Consultation Document, 2007
The Regional Sustainability Framework: Towards a Better Quality of Life in the South East, Consultation,
Association of Councils of the Thames Valley Region (2006) Gypsy and Traveller Accommodation Needs Assessment for the Thames Valley Region.

4.3 Baseline information (A2)

- 4.3.1 Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems (see SA Stage A3 below). Collection of baseline information forms an essential part of the SA process and is a requirement of the SEA Directive.

The SEA Directive requires:

“the relevant aspects of the current state of the environment and the likely evolution there of without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” to be included into the Environmental Report.

(Annex 1(b) and (c) of the SEA Directive)

- 4.3.2 It is vital to obtain sufficient baseline information on the current and likely future state of the area in order to enable the plan’s effects to be adequately predicted and evaluated⁷. Where possible data has been collected which is able to show either a spatial or temporal trend. This allows for a more informed judgement of the current situation in terms of the sustainability baseline of certain areas relative to others.
- 4.3.3 Baseline information was collected within the following categories:
- Population

⁷ DCLG (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Framework* (available at: http://www.odpm.gov.uk/stellent/groups/odpm_planning/documents/page/odpm_plan_030923.pdf)

- Ethnic diversity
- Accommodation Needs
- Health
- Education
- Travel patterns and car ownership
- Harassment
- Living conditions
- Eviction

4.4 Sustainability Issues (A3)

- 4.4.1 This stage involves identifying the Sustainability Issues that are most pressing and so should be taken into consideration during the assessment. The Sustainability Issues listed in Table 4.2 were identified from the context and baseline review (SA Stages A1 and A2). The identification of Sustainability Issues is a requirement of the SEA Directive:

The ‘Environmental Report’ required under the SEA Directive should include:

“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [the ‘Birds Directive’] and 92/43/EEC [the ‘Habitats Directive’]”

(Annex 1(d) SEA Directive)

Table 4.2: Summaries of the South East of England Gypsy, Traveller and Travelling Showpeople Review Sustainability Issues and Problems

Sustainability problem	Supporting evidence and issues for consideration
Social	
Health inequality and wider determinants	Gypsies are believed to experience the worst health and education status of any disadvantaged group in England (CLG, 2006) Households who are living in permanent accommodation tend to be registered with local doctors more so than households living on sites. The level of registration varies significantly, as in some areas the level of registration of people living on sites with local doctors was very low (e.g. 12% in East Surrey) and in other very high (e.g. 98% in Chichester, 90.5% in “West” Kent). Common health issues across the south east include asthma/respiratory issues, mental health issues, walking issues/ arthritis.

<p>Access to services</p>	<p>Issues of sustainability should be considered in the round, and not just in terms of transport mode and distances from services, to include co-existence between the site and the local community, easier access to GP and other health services and children attending school on a regular basis. When considering the benefits and impacts of a particular site, consideration should be given to the avoidance of environmental damage resulting from long distance travelling and unauthorized encampment. (CLG, 2006)</p>
<p>Ability of family groups to be located together</p>	<p>Some communities of gypsies and Travellers live in extended family groups and often travel as such. This is a key feature of their traditional way of life that has an impact on planning for their accommodation needs (CLG, 2006)</p>
<p>General Living Conditions / Health and Safety</p>	<p>In general living conditions appear to be (expectedly) significantly better on authorised sites than unauthorised sites. Nevertheless, respondents on both authorised and unauthorised sites have reported issues of inappropriate facilities such as lack of water supply, toilets, vermin, poor fire precautions, poor drainage, fly-tipping by outsiders, and bad state of repair of certain blocks.</p>
<p>Harassment/integration with settled communities</p>	<p>Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing undue pressure on the local infrastructure (CLG, 2006)</p> <p>Promotion of peaceful and integrated co-existence between the site and the local community (CLG, 2006)</p> <p>Consider potential for noise and other disturbance from movement of vehicles on the site and on site business activities (CLG, 2006)</p> <p>A high proportion of respondents across the region reported having experienced harassment, in particular related to racial prejudice from the local communities.</p>
<p>Education</p>	<p>Households living on site show low levels of access to schools and significant numbers of children of school age not in school. Shepway and Thanet had particularly low levels of schooling problems. Common schooling problems include local hostility, schools rejecting the children, and disruption due to mobility. Literacy levels amongst respondents, where this was surveyed, were found to be low.</p>

<p>Range of sites available, and levels of permanence must meet needs of Gypsy/Traveller population</p>	<p>The population appears to be relatively stable with many areas having a high proportion of Gypsies and Travellers having lived in their current accommodation for one year or more. Common reasons for movement were jobs, overcrowding, culture, a preference towards seasonal travelling, schools/health care and eviction.</p> <p>Data was not always available on the number of authorised/unauthorised sites, and the samples of the population surveyed only provide an indication of the potential number of unauthorised sites within the area. Nevertheless it was noted that a significant proportion of the population was living on or used unauthorised sites, with proportions ranging between 6% (Thames Valley) and 39.7% (Hampshire and Isle of Wight).</p>
<p>Economic</p>	
<p>Type of work available to Gypsies and Travellers changing (and higher risk of economic deprivation)</p>	<p>Limited access to employment, training and skills.</p>
<p>Environmental</p>	
<p>Consideration of Nature and Heritage Designations</p>	<p>Criteria should be tightly and reasonably defined, e.g. conditions such as 'the site does not impact on any area with natural/wildlife interest' is too wide (CLG, 2006)</p> <p>Conservation sites are vulnerable to the impacts of unauthorised occupation, including woodlands areas, which have accessible and open rides and sites with rare species, (Response from English Nature, dated 14 September 2006).</p>
<p>General Environmental Impacts</p>	<p>Provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment (CLG, 2006)</p> <p>Use of brownfield, untidy or derelict land can be encouraged as this may help to enhance the environment and increase openness (CLG, 2006)</p>
<p>Environmental considerations for location of sites</p>	<p>Not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans (CLG, 2006)</p> <p>Should not be located on significantly contaminated land (CLG, 2006)</p> <p>The Government considers it would be inappropriate to suggest a policy criterion that sets a total ban on Gypsy and Traveller sites in areas with nationally recognised or local designations. However, such designations should have very considerable weight in the appraisal of potential sites". (CLG, 2006)</p> <p>"In certain circumstances, in particular, where a local authority's area contains a high proportion of green belt land, and no other suitable sites outside the green belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined green belt boundary to meet a specific, identified need for a gypsy and traveller site (CLG, 2006).</p>

4.5 The Sustainability Framework

- 4.5.1 SA is fundamentally based on an objectives-led approach whereby the potential impacts of a plan are assessed in relation to a series of objectives for sustainable development. SA Objectives should be developed that are tailored to focus the assessment only on those impacts that are likely to result from implementation of the plan and are likely to be significant. As such SA Objectives were drawn from the list of Sustainability Issues identified at Stage A3 of the SA process.
- 4.5.2 In the case of this Sustainability Appraisal it was considered wise for the assessment to reflect the objectives derived for the SA of the SE Plan itself. These objectives were taken as the basis for developing the SA Framework used within this appraisal.
- 4.5.3 It was determined at the scoping stage that the plan was likely to have a wide range of potential effects (i.e. it could impact against a wide range of Sustainability Objectives), but many effects would be highly localised and of low magnitude. It was therefore felt that, whilst all potential effects of the plan should be considered, it was important to focus the assessment on those effects likely to be most significant. Table 4.3 lists the 'first tier Sustainability Objectives' against which each plan option was assessed in detail, whilst Table 4.4 lists the 'second tier' SA Objectives, against which the effects of each plan option were considered in less detail.

Table 4.3: First tier SA objectives

To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment
To improve the health and well-being of the population and reduce inequalities in health
To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region
To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work
To reduce crime and the fear of crime
To create and sustain vibrant communities
To improve accessibility to all services and facilities
To encourage increased engagement in cultural activity across all sections of the community in the South East
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance
To conserve and enhance the region's biodiversity
To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment
To reduce waste generation and disposal and achieve the sustainable management of waste

To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region

Table 4.4: Second tier SA objectives

To reduce air pollution and ensure air quality continues to improve (Air quality)
To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts (Climate change)
To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry (Road congestion)
To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products (Reducing consumption)
To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resource management (Water quality)
To increase energy efficiency, and the proportion of energy generated from renewable sources in the region
To sustain economic growth and competitiveness across the region (Economic growth)
To stimulate economic revival in priority regeneration areas (Regeneration areas)
To develop a dynamic, diverse and knowledge -based economy that excels in innovation with higher value, lower impact activities (knowledge based economy)
To encourage the development of a buoyant, sustainable tourism sector (Tourism)
To develop and maintain a skilled workforce to support long-term competitiveness of the region.

4.6 Consultation on the scope (A5)

- 4.6.1 This stage of the process involves consultation on a Scoping Report documenting Stages A1 to A4. Consultation should involve the statutory consultees⁸, key stakeholders and the public. Consultation on the document was undertaken for the mandatory 5 week period between September and October 2006.

The SEA Directive requires that the public, together with certain environmental bodies:
“be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report”
(Article 6(2))

⁸ The Environment Agency, Natural England and English Heritage

5 Appraisal Methodology

5.1 Introduction

- 5.1.1 This section sets out the methodology for appraisal of the options developed for the assessment of the Gypsy, Traveller and Showpeople Single Issue Review, as required by the SEA Directive:

The Environment report required under the SEA Directive should include:

A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information'

Annex 1 (h)

- 5.1.2 Furthermore, the SEA Directive requires the following with regard assessing plan effects:

The SEA Directive requires the environmental assessment to identify, describe and evaluate'...'the likely significant effects on the environment of a plan or programme'
Annex II of the SEA Directive provides criteria which help determine the likely significance of an effect.

Article 5 & Annex II

5.2 The Options

Option A

- 5.2.1 Option A sets out the distribution of new Gypsy and Traveller pitches required to meet identified need in each local authority. Need was identified as a result of county and local authority Gypsy and Traveller accommodation assessments. On the whole these assessments proposed optimum levels of provision in their study areas, however, in some exceptional circumstances the information was not presented clearly or gaps existed. In these incidences SEERA came to a view on the appropriate levels of provision. For more information on the area needs assessments, their recommendations, trends and gaps please see the Scoping Report Addendum, November 2007. In total Option A proposed a regional total of **1347** additional pitches.

Option B

- 5.2.2 Whilst Option B meets the estimated need for the South East region, with a total provision of **1350** pitches, it proposes a revised distribution of these pitches between some local authority areas. However, total pitch provision by county remains broadly the same as that for Option A.

Option C

- 5.2.3 Option C promotes a similar total number of pitches as Option A and B (**1355**), but proposes a revised distribution of pitches between counties as well as local authorities. The largest increases are noted within Hampshire and the Isle of White and Oxfordshire. The counties of Kent, Surrey and West Sussex would see the largest decreases in pitch provision (from Option A) in this option.
- 5.2.4 For more information on the differences in Gypsy and Traveller pitch provision per local authority area between Options A, B and C please see the Option A, Option B and Option C Comparison Table in Appendix 2. This includes the numbers of existing sites in each local authority area.

Option D

- 5.2.5 Finally a further Option has been proposed (Option D). The pattern of distribution reflects that of Option C, with proposed changes to the same counties and local authority areas. However, the actual change in figures from Option A does not represent peaks as large as that for Option C. The effects associated with Option D will be identical to those associated with Option C, but of lower magnitude. As a result Option D has not been assessed individually, but instead, in the instances where the assessment found Option C to have a significant effect, consideration has been given to whether the effect would be the same for Option D.

5.3 The assessment methodology

- 5.3.1 The assessment stage involved considering the effects of each option against each of the Sustainability Objectives that make up the SA Framework. The appraisal was a qualitative exercise based on the professional judgement of Scott Wilson. However, where possible judgements were made taking into account evidence gathered at the Scoping Stage.
- 5.3.2 The performance of the options against each objective was given a very broad significance classification (Table 5.1) and further short descriptive summary (e.g. localised positive effects with some uncertainty). For each objective the assessment table also included a more full description of the reasoning behind the judgement on significance. In particular, the following variables all contribute to the overall significance of an effect:
- Value and sensitivity of the receptors
 - Character, permanence, magnitude, spatial extent, frequency and reversibility of effects;
 - Potential for effects to act in a cumulative or indirect manner;

Table 5.1: Significance classifications

Significance classification	Meaning
High	Option will result in a significant positive impact on the SA Objective
Medium	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be positive or minor positive impacts
Low	Neutral or negligible effect
Minor	The impact on the SA Objective is dependant on implementation, but if there were to be an impact it would most likely be negative or minor negative impacts
Major	Option will result in a significant negative impact on the SA Objective
Unclear	The relationship between the Option and the SA Objective is unknown, or there is not enough information to make an assessment.

- 5.3.3 The appraisals were documented using an assessment table proforma. The proforma included space for commentary on significance and uncertainty of predicted effects, as well as suggestions for mitigation of negative effects and enhancement of positive effects. Table 5.2 shows an example of the proforma used for the assessment. The completed proformas are provided in Appendix 1 of this report. Chapter 6 of this report provides a summary of the main findings.
- 5.3.4 Slightly different approaches were taken to the assessment of Option A as opposed to Options B and C. Essentially, the significance of effects associated with Option A were assessed against the 'business as usual' scenario, which is represented by current and predicted future baseline conditions. Options B and C, however, were not assessed as stand-alone options in this fashion. Instead, the effects of Options B and C were assessed according to the degree that they varied from Option A. The reasoning behind this approach is discussed further in the following section.

Table 5.2: Assessment Proforma

Sustainability Appraisal Assessment Matrix – Option A/B/C			
Summary of supporting evidence	Predicted Outcomes	Nature of Effect:	Mitigation / Recommendation
Sustainability Objective, description of overall effect			
		Description of positive effects: OR Description of negative effects: OR justification for finding neutral effect: Permanence: Magnitude: Scale: Time period: Likelihood Secondary and Cumulative:	

5.4 Difficulties encountered and implications for the assessment

- 5.4.1 A key issue in undertaking the appraisal of the options was their strategic nature in so much as pitches are allocated to local authorities, but at this stage there is no further indication of how local authorities will locate and plan for new pitches. This uncertainty has been found to limit the ability of the appraisal to predict significant sustainability effects as it is likely that the great majority of effects will hinge on how allocations are dealt with at the sub-authority scale. So, although there are data-sets available showing how constraints vary by local authority, these are of limited usefulness as it is only at the finer scale, taking account of the exact spatial distribution of constraints, that it will be possible to judge whether new pitches will be likely to result in significant sustainability effects.
- 5.4.2 There are some exceptions to this rule, where it is felt that there is robust enough evidence upon which to make a judgement regarding the sustainability effects of allocating more pitches in one authority as opposed to another (see discussion of appraisal findings in Sections 6 and 7). However, for the majority of Sustainability Objectives, the strongest conclusions that the assessment was able to reach focused on the effects on the Gypsy and Traveller community of meeting identified need (Option A) and diverging from identified need (Options B and C). Because of the lack sufficient evidence described above there has been less emphasis on assessing the effects on either the Gypsy and Traveller community or the receiving environment/population of the *specific allocations* promoted by each Option. In effect, the approach taken in the assessment has been to assess Option A (meeting identified need) and then to consider whether Options B and C (diverging from identified need) will have significantly different effects against each objective than was the case for Option A.
- 5.4.3 There was one other factor that limited the ability for strong conclusions to be made regarding the relative merits of the differing allocations promoted by Options B and C: It was felt that the ability for any conclusions to be drawn regarding the sustainability effects of increasing or decreasing the number of pitches allocated to any one authority was to a degree tempered by the knowledge that this would have the potential to have a secondary effect in terms of the likelihood of unauthorised pitches. In reality the correlation between providing new pitches within an authority and reducing the likelihood of unauthorised pitches might not be strong. However, the assumption made throughout the assessment (and particularly underpinning the assessment of Option A) is that unauthorised sites, where they occur, have the potential to lead to greater negative sustainability effects than authorised sites. Therefore, in most instances it was difficult to say with certainty that increasing the number of pitches within an authority would have the potential to lead to negative sustainability effects on the receiving environment/population.

6 Appraisal Findings, Recommendations and Monitoring

6.1 Introduction

- 6.1.1 This chapter sets out the summary findings from the appraisal of the Options. The full appraisal tables can be found in the Appendices to this report.
- 6.1.2 This chapter also sets out the mitigation measures identified during the appraisal. The mitigation of significant effects is a key requirement of the SEA Directive:

The SEA Directive requires 'the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme' to be included in the environmental report.

Annex 1g, the SEA Directive

6.2 Appraisal findings

- 6.2.1 The appraisal findings are detailed in Appendix 1. In order to provide a 'window into the assessment' Table 6.1 summaries the significance categories that have been assigned. However, a more comprehensive overview of the appraisal findings is given by Tables 6.2 – 6.5, which summarise the key environmental, social and economic effects for Options A - C. Finally, consideration is given to the effects associated with Option D.

Table 6.1: A ‘window into the assessment’

SA Objective	Option A	Option B*	Option C*
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Green	Orange	Orange
To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment	Light Green	Grey	Grey
To improve the health and well-being of the population and reduce inequalities in health	Green	Grey	Grey
To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region	Green	Grey	Grey
To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work	Green	Grey	Grey
To reduce crime and the fear of crime	Green	Orange	Orange
To create and sustain vibrant communities	Light Green	Orange	Orange
To improve accessibility to all services and facilities	Green	Grey	Grey
To encourage increased engagement in cultural activity across all sections of the community in the South East	Light Green	Grey	Grey
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance	Green	Grey	Grey

To conserve and enhance the region's biodiversity			
To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment			
To reduce waste generation and disposal and achieve the sustainable management of waste			
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region			

* Note that effects for Options B and C were assessed according to the degree to which they differ from the effects predicted for Option A, rather than being assessed on a stand-alone basis (according to how the option will result in changes from baseline conditions). See Section 5 for further discussion of this approach.

Table 6.2: Summary of appraisal findings for Option A

Option A has been found to result in wide ranging benefits. Many of the predicted benefits are based on the assumption that meeting identified need (as promoted by the option) will reduce the number of unauthorised pitches. Unauthorised pitches are not regulated or planned and can have a number of adverse effects which can lead to problems for both the travelling and settled communities and lead to increased tensions and reduced potential for integration between the two communities.

Permanent authorised pitches can allow for the provision of the facilities and infrastructure required to support decent living conditions, such as power and water supplies, toilet and shower facilities, and facilities for animals. Other benefits of well located pitches and sites will include the potential for proximity to employment opportunities to be a consideration and the potential for waste management to be better addressed. Another important point is that provision of pitches will allow many Gypsies and Travellers to have a permanent address, which could also result in wide ranging benefits, for example, allowing Gypsies and Travellers to access education, healthcare and employment.

Importantly, authorised pitches are less likely to negatively affect the receiving environment and population, with fewer impacts on local communities and economies as well as biodiversity, landscape and the historic environment. Well located pitches should also have less potential to result in fear of crime, although this effect is not certain. Lessening conflicts between the travelling and settled communities will help to reduce the barriers that currently prevent Gypsies and Travellers from accessing services and facilities and education and can also help to promote understanding and integration.

The sustainability effects of meeting identified need are broadly positive. It is likely that the most significant benefits will be those experienced by Gypsy and Travellers. Benefits experienced by the settled community can be significant, but will be more localised in scale. Environmental benefits will be localised and in many cases be minor.

Table 6.3: Summary of appraisal findings for Option B

Option B allocates roughly the same number of new pitches to each county as is the case under Option A although at the district level there are significant differences between the two options. The greatest departures from the allocations identified as being required to meet needs (as set out in Option A), are in Kent, with significant increases in Ashford (20), Dover (24), Medway (26) and Tonbridge and Malling (16) and significant decreases in Sevenoaks (64) and Swale (43). There are also some changes made to allocations between the Berkshire authorities, with Bracknell Forest, West Berkshire and Wokingham receiving more pitches under this Option, and Slough and Windsor and Maidenhead receiving fewer pitches, although the numbers of pitches that make up the difference between the two options is of a lower magnitude (generally less than 15) than in Kent.

The appraisal has found that, for the majority of SA Objectives, the effects associated with this Option will not be significantly different to Option A. This is because the evidence of constraints (for example related to flood risk, biodiversity, landscape, waste, employment and access to services and facilities) at the local authority scale is insufficient to conclude that additional pitches could not be delivered in a sustainable fashion.

In terms of some other Sustainability Objectives - notably health, poverty and education – there is some potential for existing issues to act as a significant constraint to the ability of new pitches to be brought forward in a sustainable fashion within an area. Furthermore, increased pitch provision or an increased likelihood of unauthorised pitches could exacerbate existing issues in some areas. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives. For example, even within an authority that suffers from relatively high levels of deprivation, it will be possible to ensure that pitches are located in areas where the ability of Gypsies and Traveller communities to thrive is not hindered, and existing baseline conditions are not compounded or exacerbated by the presence of Gypsy and Traveller pitches.

The appraisal against three of the Objectives highlighted that there may be negative sustainability implications associated with promoting an allocation of pitches that departs from the allocation identified as

necessary to meet identified needs.

Firstly, and most importantly, this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. Effects are somewhat uncertain as in many instances delivery of a level of pitches below identified needs in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority. However, in some instances it is likely that Gypsies and Travellers will not consider the offer of a pitch in a nearby authority to that which they would preferably want to live, as meeting their housing needs. Related to this, there is also the potential for this option to prevent the development of vibrant Gypsy and Traveller communities.

Secondly, it was considered that baseline crime statistics at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of fear of crime at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

Table 6.4: Summary of appraisal findings for Option C

Option C allocates significantly more pitches to Hampshire and the Isle of Wight (146) and Oxfordshire (36) and significantly fewer pitches to Kent (89) Surrey (83) and West Sussex (33). In Hampshire and the Isle of Wight the most significant increases are within Basingstoke and Deane (29), East Hampshire (20), Test Valley (26) and Winchester (22). In Kent there are increases in Ashford, Dover, Medway Shepway, Thanet and Tonbridge and Malling, though these are not as extreme as under Option B. There are large decreases in Sevenoaks (-72) and Swale (56) that are of a greater magnitude than the decreases in these districts promoted under Option B. There are also decreases of a lesser magnitude proposed in Dartford and Maidstone. In Oxfordshire there are increases promoted in Cherwell (17) and Vale of White Horse (15). In Surrey there are decreases in promoted in Guildford (13), Runnymede (20), Tandridge (10) and Waverley (22). In West Sussex there are decreases in Chchester (25) and Crawley (16).

Also, in Berkshire, the departure from the allocations set out in Option A is similar to that set out in Option B (Bracknell, West Berkshire and Wokingham receive more pitches, whilst Slough and Windsor and Maidenhead receive fewer pitches). In Buckinghamshire Aylesbury Vale receives more pitches under Option B as opposed to Option A (+15), whilst South Bucks receives fewer (-14).

The appraisal has found that, for the majority of SA Objectives, the effects associated with this Option will not be significantly different to Option A. This is because the evidence of constraints (for example related to flood risk, biodiversity, landscape, waste, employment and access to services and facilities) at the local authority scale is insufficient to conclude that additional pitches could not be delivered in a sustainable fashion.

In terms of some other Sustainability Objectives - notably health, poverty and education – there is some potential for existing issues to act as a significant constraint to the ability of new pitches to be brought forward in a sustainable fashion within an area. Furthermore, increased pitch provision or an increased likelihood of unauthorised pitches could exacerbate existing issues in some areas. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives. For example, even within an authority that suffers from relatively high levels of deprivation, it will be possible to ensure that pitches are located in areas where the ability of Gypsies and Traveller communities to thrive is not hindered, and existing baseline conditions are not compounded or

exacerbated by the presence of Gypsy and Traveller pitches.

The appraisal against three of the Objectives highlighted that there may be negative sustainability implications associated with promoting an allocation of pitches that departs from the allocation identified as necessary to meet identified needs.

Firstly, and most importantly, this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. Effects are somewhat uncertain as in many instances delivery of a level of pitches below identified needs in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority. However, in some instances it is likely that Gypsies and Travellers will not consider the offer of a pitch in a nearby authority to that which they would preferably want to live, as meeting their housing needs. Related to this, there is also the potential for this option to prevent the development of vibrant Gypsy and Traveller communities.

Secondly, it was considered that baseline crime statistics at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of fear of crime at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

Option D

6.2.2 The pattern of distribution set out in Option D reflects that of Option C, with proposed changes to the same counties and local authority areas. However, the actual change in figures from Option A does not represent peaks as large as that for Option C. The effects associated with Option D will be identical to those associated with Option C, but of lower magnitude. As a result Option D has not been assessed individually, but it is safe to assume that Option D will result in the following:

- Crime – effects are predicted to be of a similar magnitude and significance to those predicted for Options B and C
- Housing and maintenance of vibrant communities – effects will be the same as those predicted for Option C, but perhaps of a slightly lower magnitude.

6.3 Mitigation measures and recommendations

6.3.1 The assessment did not highlight a wide range of potential negative effects that could result from the implementation of the options, but for those significant negative effects that have been predicted, measures have been set out to mitigate or reverse the effects. In some other cases the assessment found that there was the potential for negative effects, but that they could not be predicted with any certainty at this strategic level. Rather than mitigation measures, in these instances the assessment recommended more general principles that must be at the forefront of future decision making in order to ensure negative effects are avoided. It will be important that

the Assembly makes a justified response to the proposed mitigation measures and recommendations listed in Tables 6.5 – 6.7.

6.3.2 The assessment also sought to consider how positive effects could be maximised. It is felt that there are relatively few opportunities for maximising positive effects at this strategic level other than by ensuring that identified need for Gypsy and Traveller pitches is met (as proposed by Option A). However, there are a great number of considerations that should inform the implementation of the preferred option by local authorities. Some particularly important recommendations to ensure that positive effects of allocating new pitches for Gypsies and Travellers are highlighted in Tables 6.8.

Table 6.5: Mitigation measures and recommendations identified by the assessment of Option A

- It will be important to ensure that additional pitches do not worsen conditions on existing sites
- Supporting Policy for the allocations can be used to help deliver sustainable construction for the implementation of pitch provision.

Table 6.6: Mitigation measures and recommendations identified by the assessment of Option B

- Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.
- Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).
- Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.
- A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.

Table 6.7: Mitigation measures and recommendations identified by the assessment of Option C

- Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.
- Reconsider the promotion of a level of pitches other than that required to meet identified need in districts

where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).

- Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.
- A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.

Table 6.8: Other recommendations to help ensure that potential benefits of implementation are maximised

To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home

- Some guidance for local authorities on the time period for which sites are granted planning permission may be required. There are benefits for the Gypsy and Traveller population from long term permissions, but local authorities may seek guarantees that sites can be subject to further development in the future.
- Local Authorities should consider not only the CLG's Draft Guidance on the Design of Sites for Gypsies and Travellers: A consultation paper, (May 2007) when designing new sites but also follow the principles set out in other guidance on sustainable design and construction to allow for the highest standards to be met.
- Transit and Showpeople sites must be subject to the same level of requirement in terms of good design and construction.

To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment

- As part of the design of sites water saving initiatives such as sustainable urban drainage systems and grey water recycling facilities should be installed especially in areas where there is a water deficit such as Dartford, Sevenoaks, Spelthorne and Elmbridge.
- In addition, given that sites allocated on Greenfield land often become permanent, site allocations should be 'future proofed' i.e. allocated based on an understanding of likely future changes in flood risk.

To improve the health and well-being of the population and reduce inequalities in health

- Existing sites should be improved to meet health and safety standards, size standards, facilities for the disabled, access to health care where they may require expansion to meet pitch requirements.
- Local authorities should be directed to consider ways of providing for the specific needs of this ethnic minority group as part of developing their strategic policies on health in partnership with PCTs and other health consultees.
- Local Authorities when promoting health measure such as healthy eating, exercise and other measures for good health should target those ethnic minorities suffering the worst conditions such as the Gypsy and Traveller community.

To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region

- In partnership with social services and other relevant consultees and local authorities, there should be a proactive approach to improving the conditions for the Gypsy and Traveller community. Options that tackle the causes of social exclusion and poverty, such as barriers to education, health services and adequate site infrastructure should be addressed.

To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work

- Local authorities when creating new sites should aim to include requirements for accessibility to educational facilities, including libraries and adult education facilities.

To reduce crime and the fear of crime

- Prior to the opening of new sites local authorities could be advised to undertake education and awareness workshops to improve relations between the settled and travelling communities and reduce the fear of crime.

To create and sustain vibrant communities

- When allocating, planning for and designing sites, recognition of the distinctions between the sub groups within different Gypsy, Traveller, and Travelling Showpeople communities (i.e. Romany, Irish and English) will assist in supporting vibrancy. This would also be in keeping with the principles set out in the Race Relations Act, and the Human Rights Act.
- This may include consideration of the size of pitches, improving buffering around existing pitches, and the provision of high quality communal facilities.
- Public sites should also be adequately buffered from the settled community with planting for example to allow for privacy for Gypsy, Traveller and Travelling Showpeople families.
- LPAs are likely to need place tailored initiatives to support the Gypsy and Traveller communities especially in areas already experiencing high levels of deprivation.

To improve accessibility to all services and facilities

- Policy could be supported by guidance to ensure sites are located in proximity to educational, health facilities, public transport, and other essential facilities in line with CLG guidance.
- Guidance for LPA's should also consider requirements for on site facilities and infrastructure, including water supply, toilet and washing facilities, drainage and waste facilities and services.
- When developing options for the allocation of Gypsy and Traveller sites, local authorities should host meetings with health, education and other service providers to discuss what measures can be put in place to improve access to these essential facilities.
- In order to facilitate accessible services local authorities should be encouraged to carry out some additional research on specific barriers which inhibit the Gypsy and Traveller community in order to overcome these. This could help to overcome such barriers.
- Transit and showpeople sites should be subject to the same level of facilities, infrastructure and accessibility as permanent sites.

To encourage increased engagement in cultural activity across all sections of the community in the South East

- Further research on Gypsy and Traveller cultures and sub-cultures and traditions by local authorities cultural services may be beneficial.
- Local authorities, when developing policies on promoting engagement in culture, should consider options on how they promote increased awareness and respect for the Gypsy and Traveller cultures and traditions, as well as improving access for Gypsies and Travellers to wider cultural activities in the South East.
- Measures to promote the positive cultural traditions of Gypsies and Travellers should be considered, which this could lead to further requirements for the provision of facilities on sites.

To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance

- Although a sequential approach should be applied, policy should avoid limiting the search for Gypsy and Traveller sites to brownfield land. The planning process will determine at the local level the most appropriate and efficient use of land given the pressures for settled accommodation and the complex needs of the Gypsy and Traveller communities.

To conserve and enhance the region's biodiversity

- The allocation of sites should be in accordance with PPS9, Thames Basin Heath SPA Draft Interim Strategic Delivery Plan, and other national, regional, and local Biodiversity Action Plans.
- Ability to provide for appropriate grazing areas should be considered when allocating sites.

To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment

- It will be important that sites are allocated in accordance with PPG16 (Archaeology), PPS9 (Biodiversity and Geological Conservation), PPS7 (Sustainable Development in Rural Areas) and other relevant guidance
- It is likely that one of the main concerns regarding Gypsy and Traveller sites will be their visual intrusion on the surrounding countryside. Measures such as natural screening and landscaping of sites could mitigate these concerns.

To reduce waste generation and disposal and achieve the sustainable management of waste

- Local authorities, when designing Gypsy and Traveller sites, should work in partnership with the local waste services to include the most appropriate waste recycling and composting facilities to assist in meeting local targets.
- Any local promotional campaigns to encourage recycling and composting should also be targeted towards ethnic minorities including the Gypsy and Traveller community to increase the levels of recycling and composting.

To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region

- Local authorities, when developing education, training, skills, employment and other related policies, should work with education providers to help improve access to those least likely to access skills training, such as the Gypsy and Traveller community.

6.4 Monitoring

- 6.4.1 Sustainability Appraisal includes a requirement for monitoring the significant effects of plans and programmes and the SA Report should include a description of the measures envisaged for such monitoring. The SA Guidance states that:

“Monitoring arrangements should be designed to provide information that can be used to highlight specific performance issues and significant effects, and lead to more informed decision-making.”

(Paragraph 4.6.2, p 75)

- 6.4.2 Table 6.9 below summarises the suggested indicators for monitoring the significant effects of the Single Issue Review, as identified through the appraisal. .

Table 6.9: Significant effects that will be addressed by the SPD and potential significant effects indicators

Significant Effects	Potential Indicators
The ability of Gypsies and Travellers to have the opportunity to live at an authorised permanent pitch within an area where they want to live	It is proposed that Gypsies and Travellers who chose to remain on unauthorised sites should be interviewed to ascertain their reasons for doing so. It will also be important to monitor the occupancy rates of newly created pitches and sites.
The strength and vibrancy of Gypsy and Traveller communities may be affected if groups are forced to move away from one another, to areas where they would not ideally want to live, in order to access a permanent authorised site.	It is proposed that Gypsies and Travellers who move to newly created pitches and sites should be interviewed to ascertain whether they have had to make any such sacrifices, consciously or sub-consciously, in order to access a permanent, authorised pitch.
Several of the Options have the potential to result in increases in numbers of Gypsies and Travellers in areas that such an increase could exacerbate existing issues of fear of crime	It is proposed that in areas with existing issues in terms of fear of crime, that area likely to receive an increase in Gypsy and Traveller numbers, that consideration is given to qualitative surveys of the local population to ascertain whether Gypsies and Travellers figure highly as a cause of fear of crime.

7 Conclusions

- 7.1.1 Because of the strategic nature of the assessment and a lack of sufficient evidence the strongest conclusions reached by the assessment related to the effects on the Gypsy and Traveller community of **meeting identified need** (Option A) and **diverging from identified need** (Options B and C). There has been less of an emphasis on assessing the effects of the specific allocations promoted by each Option. In effect, the approach taken in the assessment has been to assess Option A (meeting identified need) and then to consider whether Options B and C (diverging from identified need) will have significantly different effects against each Sustainability Objective than was the case for Option A.
- 7.1.2 Meeting identified need (Option A) has been found to result in wide ranging benefits. Many of the predicted benefits rely heavily on the assumption that meeting identified need will reduce the number of **unauthorised pitches**. Unauthorised pitches are not regulated or planned and can have a number of adverse effects which can lead to problems for both the travelling and settled communities and lead to increased tensions and reduced potential for integration between the two communities.
- 7.1.3 **Permanent authorised pitches** can allow for the provision of the facilities and infrastructure required to support decent living conditions, such as power and water supplies, toilet and shower facilities, and facilities for animals. Other benefits of well located pitches and sites will include the potential for proximity to employment opportunities to be a consideration and the potential for waste management to be better addressed. Another important point is that provision of pitches will allow many Gypsies and Travellers to have a permanent address, which could also result in wide ranging benefits, for example, allowing Gypsies and Travellers to access education, healthcare and employment.
- 7.1.4 Importantly, authorised pitches are less likely to negatively affect **the receiving environment and population**, with fewer impacts on local communities and economies as well as biodiversity, landscape and the historic environment. Well located pitches should also have less potential to result in fear of crime, although this effect is not certain. Lessening conflicts between the travelling and settled communities will help to reduce the barriers that currently prevent Gypsies and Travellers from accessing services and facilities and education and can also help to promote understanding and integration.
- 7.1.5 The sustainability effects of meeting identified need are broadly positive. It is likely that the most significant benefits will be those experienced by Gypsy and Travellers. Benefits experienced by the settled community can be significant, but will be more localised in scale. Environmental benefits will be localised and in many cases be minor.
- 7.1.6 **Options B and C** have the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. However, effects are somewhat uncertain as in many instances delivery of a level of pitches below identified need in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority or county. There is greater potential for negative effects as a result of Option C as a result of it promoting divergence from identified need at a greater spatial scale (i.e. Gypsies and Travellers may be forced to live further from their preferred location). As well as possibly preventing some Gypsies and Travellers from meeting their housing need (in an area where they want to live), there is also the

potential for the development and maintenance of vibrant Gypsy and Traveller communities to be hindered.

- 7.1.7 Furthermore, in terms of meeting health and education needs and ensuring that Gypsies and Travellers can be lifted out of poverty, there is some potential for poor existing baseline conditions for a local authority to indicate that there could be significant constraints on the ability of new pitches to be brought forward in a sustainable fashion. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives.
- 7.1.8 In most cases, the assessment was **unable to draw strong conclusions** regarding how the redistribution promoted by Options B and C would impact upon the receiving environments, communities and economies. The reasons for this are twofold:
3. The options are **strategic in nature** and there is insufficient evidence to base any judgment on. For example, it is not possible to conclude that biodiversity effects will be improved if fewer pitches are allocated to authorities with Natura 2000 sites because all we know is whether Natura 2000 sites are present, and not the number/area of sites or their sensitivity. Furthermore, it is questionable whether this indicator could ever be a comprehensive way to identify overall biodiversity impact, even if we had complete information regarding the number, area and sensitivity of Natura 2000 sites for each authority.
 4. It is very difficult to conclude that an increase in pitches allocated to a local authority will have negative effects on the receiving environment or population if it is assumed that this will result in **less local potential for unauthorised sites**. Throughout the assessment we have worked from the assumption that unauthorised sites are associated with a range of negative effects for the receiving environment and population (as well as the Gypsy and Traveller community), but authorised sites have the potential to reduce these negative effects (as well as benefit the Gypsy and Traveller community) as a result of being well sited and well planned for.
- 7.1.9 There was one exception to this rule. It was considered that **baseline crime statistics** at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of **fear of crime** at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

Appendix 1 – Appraisal Tables

Sustainability Appraisal Assessment Matrix – Option A			
Summary of supporting evidence	Assessment of outcomes	Nature of Effect: Positive or negative / Permanent or Temporary / Magnitude / Geographical Scale / Time period / Likelihood / Secondary and Cumulative	Mitigation / Recommendation
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home = Positive Effect			
<p>There are 341 unauthorised sites in the South East region. (Caravan Count Data, CLG, Jan 2006/2007)</p> <p>Circular 1/94 has failed to deliver adequate sites for Gypsies & Travellers in many areas of England over the last 10 years. There have been more applications for private Gypsy and Traveller sites, but this has not resulted in the necessary increase in provision. (Scoping Report, p24)</p> <p>The districts which contain the most unauthorised pitches are Spelthorne which contains 32 pitches, Aylesbury Vale contains 23, Swale contains 26 and Maidstone with 40. (Caravan Count Data, CLG, 2006)</p>	<p>This option provides additional pitch provision across the region for permanent sites, with an expectation of delivering transit and show people pitches where a need is identified</p> <p>Additional pitch provision of to CLG standards will reduce the need for Gypsies and Travellers to live in unauthorised sites, which tend to associated with poor living conditions.</p>	<p>Positive effect: Allocating the required provision for pitches to local authorities is a positive measure which will lead to the provision of sites that will be of a higher quality than unauthorised sites.</p> <p>Permanence: Permanence of effects are uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will be granted.</p> <p>Magnitude: The effects of allocations for site provision are likely to be significant for the Gypsy and Traveller population.</p> <p>Scale: Effects will be felt by the Gypsy and Traveller population region-wide.</p> <p>Time period: As opposed to bricks and mortar housing, good quality sites may be created quickly and so effects could be felt in the short to medium term as well as long. However, pitches will be brought forward through the statutory LDF process. The preparation of a site</p>	<p>Supporting Policy for the allocations can be used to help deliver sustainable construction for the implementation of pitch provision.</p>

<p>Where available the needs assessments have indicated that some of the Gypsy and Traveller population have used unauthorised sites. This may reflect reasons for movement which include jobs, overcrowding, culture, a preference towards seasonal travelling, schools/health care and eviction. (Scoping Supplement, p25)</p>		<p>allocation DPD will take from 3-5 years following the adoption of this policy. As a result the effects could be felt in the medium to long term.</p> <p>Likelihood: Identified effects are highly likely.</p> <p>Secondary and Cumulative: Potential secondary impacts on the provision of market housing if new traveller sites reduce available land.</p>	
<p>To reduce the risk of flooding and resulting determinant to public well-being, the economy and the environment = Uncertain positive effects of minor significance</p>			
<p>Over 235,000 properties are located in the indicative fluvial and tidal floodplain, and are at some risk from flooding. Climate change is also likely to increase the incidence of flooding. (Scoping Report, p24)</p> <p>The plan can also have a vital role in focusing development away from floodplain and ensuring that necessary development is 'Future Proofed'. The plan can also promote the use of sustainable drainage systems for managing surface water run-off from development, and promote biodiversity gain through floodplain management. (Scoping Report, p24)</p>	<p>It is assumed that the guidance in PPS25 regarding adherence to the exceptions test will be adhered to and as such few sites will come forward in flood zones.</p> <p>Where sites are located outside of floodplains the levels of pitch provision will not be sufficiently large enough to alter water movement in a catchment in a way that increases flood risk elsewhere.</p>	<p>Positive effect: Provision of pitches in authorised locations will reduce the number of unauthorised sites, which might be more likely to be in the flood plain.</p> <p>Permanence: Permanence of effects are uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will be granted.</p> <p>Magnitude: Effects are unlikely to be of a significant magnitude on a regional scale.</p> <p>Scale: Effects are likely to be significant on a more local scale.</p> <p>Time period: Impacts of flooding can be considered short term</p> <p>Likelihood: There is the potential for authorised Gypsy and Traveller sites to</p>	<p>It is assumed that when implementing the allocations Local Authorities will adhere to the requirements of PPS25 and as such no further mitigation would be required within the Single Issue Review.</p>

<p>PPS 25 states that “caravan or park-home sites intended for permanent occupation are regarded as ‘highly vulnerable’. The instability of such structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is likely to be higher.” (PPS25, p29). Therefore development should not be permitted in flood risk zones.</p>		<p>be located in the floodplain following the use of the PPS 25 exceptions test. Secondary and Cumulative: Possible cumulative effects with other permitted development on a water body’s catchment area.</p>	
<p>To improve the health and well-being of the population and reduce inequalities in health = Positive effect</p>			
<p>Gypsies and Travellers are believed to experience the worst health status of any disadvantaged group in England (Circular 01/2006). Research has consistently confirmed the link between the lack of good quality sites for Gypsies and Travellers and poor health (Scoping Report, p25, Annex A, pA8)</p> <p>The Gypsy and Traveller community were less likely to be registered with a Doctor than the settled community. (Supplementary Scoping Report p 17)</p> <p>From the needs assessment it has shown that the Gypsy and</p>	<p>Providing authorised pitches, both for permanent and transit needs, will provide opportunities for Local Authorities to increase accessibility to health services, through physical proximity and a permanent address from which to register with health services.</p> <p>Conditions on authorised sites are significantly higher than unauthorised encampments, which offer no facilities. However, existing authorised sites still report health problems.</p>	<p>Positive effect: The provision of new pitches should provide an increase in overall living conditions for those Gypsies and Travellers that currently do not have access to a suitable permanent pitch. It is assumed that effects will be most significant on newly created sites, although this will depend on facilities provided on site and the proximity to external health facilities. However, new pitches will not necessarily lead to improved health at existing sites.</p> <p>Permanence: Permanent effects are uncertain as this is dependant on the length of time permissions for permanent, transit and show people sites are granted for.</p> <p>Magnitude: In terms of effects on the Gypsy and Traveller population the magnitude could be high.</p>	<p>It will be important to ensure that additional pitches do not worsen conditions on existing sites</p>

<p>Traveller community suffer from high levels of disability. (Supplementary Scoping Report p 17)</p>		<p>Scale: Effects are likely to be felt across the region by the Gypsy and Traveller population who currently have no access to a suitable permanent pitch.</p> <p>Time period: Largely effects will depend on whether sites are maintained to a high standard.</p> <p>Likelihood: Positive effects are likely</p> <p>Secondary and cumulative: Option A may could also alleviate overcrowding on existing sites (sites of more than 15 pitches).</p>	
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region = Positive effects with some uncertainty</p>			
<p>Gypsies and Travellers are the most deprived group in England (CLG, 2006).</p> <p>Most families reported some concern in respect to basic facilities ranging from access to a toilet to waste in varying degrees. (Supplementary Scoping Report p.22)</p> <p>Pockets of deprivation amongst the settled community are found throughout the region. (SA Report for the Draft SE Plan, Annex B, p.33, 2006).</p>	<p>Providing new pitches could help to reduce ill-feeling towards the travelling community as a result of reducing unauthorised pitches and sites.</p> <p>Providing the means for the travelling community to have a permanent address will help to reduce barriers to employment and in turn this could help to impact on deprivation experienced by this group.</p>	<p>Positive effect: Meeting the Gypsy and Traveller community's accommodation needs is a vital step towards allowing Gypsies and Travellers to lift themselves out of poverty and integrate better with the wider community.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites are granted for.</p> <p>Magnitude: Effects are likely to be significant for the Gypsy and Traveller population</p> <p>Scale: Effects are likely to be felt by the Gypsy and Traveller population across the region that currently have no access to a suitable permanent pitch.</p> <p>Time period: Change would be felt over the long term rather than</p>	<p>N/A</p>

		<p>immediately.</p> <p>Likelihood: A range of supporting measures would need to be put in place to address the poverty, social exclusion and deprivation suffered by this minority group.</p> <p>Secondary and cumulative: As social exclusion decreases secondary effects in terms of access to employment and education could result.</p>	
<p>To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work = Positive effects with some uncertainty</p>			
<p>Gypsies and Travellers are believed to experience the worst education status of any disadvantaged group in England. Research has consistently confirmed the link between the lack of good quality sites for Gypsies and Travellers and poor education. (SA Report for the Draft SE Plan, Annex B, p.32)</p> <p>The region includes pockets of education deprivation. (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p>	<p>High levels of evictions from unauthorised sites can cause family groups to move often. This reduces the likelihood of children being enrolled in and attending school. The provision of pitches should provide a permanent address and help increase access to educational facilities for those who currently have poor access.</p> <p>However, it is not just physical access to schools that causes problems. There are low enrolment issues as a result of bullying and also an inability to integrate. These are issues that pitch provision alone will struggle to counter.</p>	<p>Positive effect: Provision of new pitches will improve access to education for those for whom it results in the opportunity for a permanent address.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites are granted for.</p> <p>Magnitude: Effects will be of a significant magnitude</p> <p>Scale: Effects will be felt by Gypsies and Travellers across the region</p> <p>Time period: It is considered that change would be felt over the long term rather than immediately.</p> <p>Likelihood: Removing the barriers to education will involve a number of measures. The reduction of unauthorised encampments alone may not be sufficient to raise the education standards of the gypsy and traveller</p>	<p>N/A</p>

	<p>Those who are already resident on existing authorised sites report many educational problems also.</p>	<p>community. Secondary and cumulative: Enabling access to education will help to raise the aspirations of the travelling community.</p>	
<p>To reduce crime and the fear of crime = Positive effects with some uncertainty</p>			
<p>Fear of crime remains below the national average in the South East region. Although there are areas within the region where the figure matches the national average. (Scoping Report, p.17)</p> <p>There are pockets of crime deprivation in some parts of the region. (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p> <p>All Gypsy and Traveller communities reported experiencing harassment to varying degrees ranging from 10% to 30% of those surveyed. (Supplementary Scoping Report, p.21)</p> <p>There is a lack of information on Gypsy and Traveller related crime statistics.</p> <p>Although levels of unauthorised pitches have consistently reduced since Jan 2005, some authorities still have high levels</p>	<p>Harassment is likely to increase where there are tensions between the settled and Gypsy and Traveller communities, which in turn will be more likely where there are badly located unauthorised sites. As a result well-located permanent sites may reduce levels of harassment.</p> <p>Incidents of criminal activity are often linked to lack of education, poor living conditions and lack of access to jobs. To reduce the likelihood of the Gypsy and Traveller community generating crime these issues should also be addressed.</p>	<p>Positive effect: The provision of more authorised pitches may result in fewer Gypsies and Travellers living on unauthorised sites, which in turn may encourage social groups to mix in the long term, reducing tensions and incidents of harassment, and has the potential to reduce fear of crime amongst the settled community.</p> <p>Permanence: Other drivers of crime or fear of crime could potentially lessen or reverse positive effects over time.</p> <p>Magnitude: Certainty on the level of reduction in crime that new pitch provision could lead is not possible at this stage.</p> <p>Scale: Effects will be localised but felt by both Gypsy and Traveller and settled communities across the region.</p> <p>Time period: It is likely that integration of social groups could take some time</p> <p>Likelihood: Effects for both the settled and Gypsy and Traveller communities are uncertain</p> <p>Secondary and cumulative: Uncertain at this stage.</p>	<p>N/A</p>

<p>of unauthorised pitches. (Information from Caravan Count Data, CLG, January, 2007)</p>			
<p>To create and sustain vibrant communities = Uncertain positive effects</p>			
<p>There are pockets of living environment deprivation across the region (SA Report for the Draft SE Plan, Annex B, p.48, 2006)</p> <p>The Gypsy and Traveller, and Travelling Showpeople community consists of a number of sub communities and should not be regarded as one cohesive group.</p> <p>The Race Relations Act places a duty of public (including local) authorities to eliminate unlawful discrimination and promote equal opportunities and good race relations.</p> <p>The European Court of Human Rights has held that: “occupation of [a] caravan is an integral part of...ethnic identity as a gypsy, reflecting the long tradition of that minority of following a travelling lifestyle. This is the case even though...many gypsies</p>	<p>Provision of additional Gypsy and Traveller pitches will decrease the number of people forced to live at unauthorised sites, where conditions are likely to be worse, and there is less chance for harmonious relationships to develop.</p>	<p>Positive effect: It is considered that authorised sites that meet stated needs will be more likely to enable the creation of vibrant communities than unauthorised sites.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will granted for.</p> <p>Magnitude: Option A will have a minimal impact on supporting vibrancy in absence of additional measures.</p> <p>Scale: Benefits may be felt by those Gypsies and Travellers throughout the region. Localised effects may also be felt by the settled community.</p> <p>Time period: Uncertain at this stage, it is difficult to ascertain whether tension between social groups will arise, dissipate and produce cohesive and vibrant communities across the region.</p> <p>Likelihood: There is considerable uncertainty as to positive effects. New authorised permanent pitches will provide opportunities to create vibrant communities but will largely depend on the mind set of all affected groups.</p> <p>Secondary and cumulative:</p>	<p>N/A</p>

<p>increasingly settle for long periods in one place”.</p> <p>There is a lack of baseline information regarding the perceptions and feelings of the settled communities and the Gypsy and Traveller communities regarding one another.</p>		<p>Inappropriate, visually intrusive, unauthorised pitches can generate negative perceptions of the Gypsy and Traveller community.</p>	
<p>To improve accessibility to all services and facilities = Positive effects with some uncertainty</p>			
<p>PPS1, draft PPS3, PPG3 and PPG13 and the adopted RPG for the SE highlight the principle that is important for citizens to have access to services and facilities (Scoping Report p.18).</p> <p>More information and research is needed on the cultural barriers instilled, which inhibit the Gypsy and Traveller and travelling Showpeople communities from accessing key services and facilities.</p> <p>Access to services and facilities can be an issue of particular concern for rural communities and for deprived communities also.(SA Report for the Draft SE Plan, Annex B, p.51, 2006)</p>	<p>Improving access will firstly involve physically locating sites in good proximity to existing services and facilities such as schools, doctor’s surgeries, and dentists.</p> <p>However, the constraints that can stop Gypsy, Travellers, and Travelling Showpeople accessing services and facilities are more than just physical. For example, in some cases there are restrictions to access due to tensions between the Gypsy and Traveller and settled community.</p> <p>Furthermore, the provision of high quality amenities and</p>	<p>Positive effect: It is assumed that authorised pitches, and especially newly created authorised sites (which this option is likely to result in) will have relatively good access to services and facilities.</p> <p>Permanence: Uncertain at this stage. The provision of services may be subject to market demands beyond the influence of pitch provision.</p> <p>Magnitude: Benefits will be of a significant magnitude for those Gypsies and Travellers who will benefit.</p> <p>Scale: The option is likely to significantly affect the Gypsy and Traveller population only unless new pitches are located in areas where access to essential services and facilities are already very low for the settled community.</p> <p>Time period: Assuming that there will be no lag time between pitch provision and provision of services and facilities,</p>	<p>N/A</p>

	<p>services on site and consideration of access for private vehicles is also essential in order to ensure good access.</p>	<p>effects should be immediate. Likelihood: The patterns that define how Gypsy and Travellers access and make use of local services and facilities is not in all cases as clear as it is for the settled community, and so there is some uncertainty. Secondary and cumulative: Access to services and facilities can lead to health, education and community benefits.</p>	
<p>To encourage increased engagement in cultural activity across all sections of the community in the South East = Weak uncertain positive effect</p>			
<p>The draft RES sets out to encourage the recognition of cultural diversity as a key driver for sustainable prosperity, through economic inclusion. (SEERA RES, 2006)</p> <p>In general there is a lack of information and awareness of the Gypsy and traveller cultures and sub-cultures and traditions.</p>	<p>It is important to create the conditions whereby the cultural traditions of the Gypsy, Traveller and Travelling Showpeople communities can be maintained.</p> <p>It is possible that respect for cultural traditions will be something that is able to bring the settled and Gypsies and Traveller communities closer together.</p> <p>It is important that efforts to improve living conditions for Gypsies and Travellers are not focused on trying to make them more settled</p>	<p>Positive effect: It is difficult to clearly state that the allocation of pitches will directly impact on engagement in cultural activity. However, the opportunity to create stable and vibrant communities will help to create the conditions under which traditional and cultural activities can flourish.</p> <p>Permanence: Uncertain at this stage. This depends on factors such as the level of cultural activity amongst Gypsy and Traveller groups and ability to integrate these with the settled community.</p> <p>Magnitude: Cultural activity cannot be gauged with any certainty, but it is not thought that the magnitude of benefits will be high in all cases.</p> <p>Scale: There is the potential for benefits to be felt by the entire Gypsy and Traveller population.</p>	<p>N/A</p>

	<p>people.</p>	<p>Time period: Effects are not likely to be immediate.</p> <p>Likelihood: Uncertain at this stage. This depends on factors such as the level of cultural activity amongst Gypsy and Traveller groups and ability to integrate with the settled community.</p> <p>Secondary and cumulative: Uncertain at this stage. This depends on factors such as the level of cultural activity amongst Gypsy and Traveller groups and ability to integrate these with the settled community.</p>	
<p>To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance = Minor positive effect</p>			
<p>There is little evidence to suggest / support the presumption that brownfield land would be the most sustainable land upon which to locate Gypsy and Traveller and Travelling Showpeople Communities. In many cases there will be other land uses that might be more suitable.</p> <p>The availability of land in urban and rural locations varies through the region. (SA Report for the Draft SE Plan, Annex B, p.55, 2006)</p>	<p>Unauthorised sites are generally located in inappropriate locations. The allocation of permanent and transit pitches in the most sustainable locations will support the general principle of land efficiency.</p> <p>However the allocation of Gypsy and Traveller and Travelling Showpeople sites on previously developed land may not be seen as the most sustainable re-use of land in areas with competing pressures for other uses such as affordable housing.</p>	<p>Positive effect: Promoting authorised pitches and a reduction in the number of unauthorised pitches should lead to a more efficient use of land.</p> <p>Permanence: Permanent effects are uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will granted for.</p> <p>Magnitude: Aside from within the authorities with greater allocations, pitch allocations will result in only a small effect.</p> <p>Scale: Effects are likely to be localised</p> <p>Time period: Any significant effects would be felt cumulatively over the long-term, rather than immediately</p> <p>Likelihood: It is clear that preventing unauthorised sites will have a positive</p>	<p>N/A</p>

		<p>effect in terms of this assessment. Secondary and cumulative: Potential adverse effects. Competition for Brownfield sites is high. Provision of new pitches could limit the availability of land for development to meet other needs (e.g. market housing, employment) and vice versa.</p>	
<p>To conserve and enhance the region's biodiversity = Positive localised effects, often of a low magnitude</p>			
<p>PPS9 sets out planning policies on protection of biodiversity and geological conservation through the planning system. An objective is "to contribute to rural renewal and urban renaissance by...ensuring that developments take account of the role and value of biodiversity in supporting economic diversification and contributing to a high quality environment".</p> <p>A significant amount of the region is designated as nationally or internationally important for biodiversity and landscape. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p>	<p>The effects of the option on this SA Objective will be dependant on location.</p> <p>Potential adverse impacts on biodiversity could result from noise and waste if sites are in close proximity. Biodiversity sites could also come under pressure from grazing for animals kept by the travelling community.</p>	<p>Positive effect: There is a risk unauthorised encampments may be located in areas of importance for nature conservation.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will granted for.</p> <p>Magnitude: Not likely to be of a high magnitude</p> <p>Scale: Effects will be localised, affecting only that biodiversity within close proximity to Gypsy and Travellers sites.</p> <p>Time period: Effects will often be relatively indirect (e.g. the grazing off horses) rather than direct (e.g. pitches located on SSSIs) and so in such cases effects will worsen over time.</p> <p>Likelihood: It is likely that pitch provision will be beneficial in reducing unauthorised encampments on or near to biodiversity sites.</p> <p>Secondary and cumulative: Biodiversity benefits could be</p>	<p>N/A</p>

		cumulative as well as site specific	
To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment = Positive effects			
<p>PPS7: Sustainable Development in Rural Areas Rural area standards are required to be based on sustainable design and a suitable building must exemplify the highest standards of contemporary architecture, however this should not define a style nor preclude the use of traditional architecture. Additionally, any house will significantly enhance and be sensitive towards the defining character of its immediate setting and wider local area. Special justification is essential for isolated new houses where this relates to a worker's need to permanently live at or near their place of work. This is based on criteria relating to the support of new or well-established agricultural activities or changes in the scale and character of farming and forestry for example.</p> <p>Developers and local authorities should take into account archaeological considerations and deal with them from the beginning of the development</p>	<p>Sites for Gypsies, Travellers and Showpeople could have significant visual effects and therefore the countryside and historic environment would need to be a consideration in implementing the allocations stipulated in Option A.</p>	<p>Positive effect: Unauthorised pitches will often be in inappropriate locations thus potentially threatening the integrity of the countryside and historic environment. The allocation of authorised pitches in appropriate locations will alleviate this.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will granted for.</p> <p>Magnitude: This is largely dependant on the quality of the receiving environment, but will be significant in many instances.</p> <p>Scale: Effects on the countryside will be localised, i.e. only in the vicinity of Gypsy and Traveller pitches</p> <p>Time period: Effects may not be immediate as it will take some time for all Gypsies and Travellers to vacate unauthorised sites.</p> <p>Likelihood: It is likely that local planning will direct authorised sites away from sensitive areas. Only in areas with other land use pressures could effects be noted and these are likely to be minor.</p> <p>Secondary and cumulative: Any damage to the regions countryside and historic environment could have</p>	N/A

<p>control process". (PPG16)</p> <p>Approximately one-third of the region is covered by AONB designations.</p>		<p>secondary effects on the amount of people using and enjoying these.</p>	
<p>To reduce waste generation and disposal and achieve the sustainable management of waste = Positive localised effects</p>			
<p>National/EU wide Target: To reduce the BMW land filled to 75% of that produced in 1995 by 2010; 50% by 2013; and 35% by 2020 (EU Landfill Directive).</p> <p>Target to recycle or compost at least 25% of household waste by 2005; 30% by 2010 and at least 33% by 2015 (National Waste Strategy).</p> <p>No data on fly-tipping related to unauthorised Gypsy and traveller sites however. The presumption is that this does sometimes occur.</p>	<p>Allocations alone will not impact on sustainable waste management. However, in implementing this option waste facilities should be a consideration. In order to meet the desire to reduce the amount of waste going to landfill recycling facilities need to be increased, including on Gypsy, Traveller, and Travelling Showpeople sites.</p> <p>Education and awareness on the importance of recycling will also assist in levels of recycling for the settled and Gypsy, Traveller and travelling Showpeople community.</p>	<p>Positive effect: Unauthorised sites are not equipped with waste collection services or recycling facilities. The allocation of authorised pitches will serve to improve or alleviate fly-tipping associated with unauthorised sites and can provide facilities for recycling.</p> <p>Permanence: Dependant on the continued provision of services from individual local authorities</p> <p>Magnitude: The magnitude of the effect that fly-tipping can have on local people is significant</p> <p>Scale: Effects will only be felt in the localised areas where fly-tipping would otherwise occur</p> <p>Time period: Benefits will be felt in the long term</p> <p>Likelihood: Providing pitches to meet need is likely to result in the predicted effects, although there is likely to be some residual waste issues associated with authorised sites.</p> <p>Secondary and cumulative: Waste, which has accumulated around unauthorised encampments, is likely to increase the negative perception of the Gypsy, Traveller, and Travelling</p>	<p>N/A.</p>

		<p>Showpeople community. Reducing this waste may indirectly assist in altering perceptions.</p>	
<p>To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region = Positive effect</p>			
<p>Draft RES has the target to improve the productivity of the workforce and increase economic activity from 82% to 85% by bringing 110,000 net additional South East residents of working age into the labour market by 2016 (as a step towards bringing up to 250,000 residents into the labour market by 2026) (Scoping Report, p.24)</p> <p>There are pockets of employment deprivation in the region, where employment rates are lower than the SE average. (SA Report for the Draft SE Plan, Annex B, p.113, 2006)</p>	<p>Providing a permanent address will provide an opportunity for the Gypsy and Traveller population to overcome one of the barriers to employment.</p> <p>In order to improve the Gypsy, Traveller and Showpeople community's contribution to the local economy the root causes need to be addressed (i.e. the community benefit least from education and training compared to the settled community. However, permanent pitches alone cannot break down all of the barriers to enter the traditional economy</p>	<p>Positive effect: Providing a permanent address is beneficial in providing accessibility to employment opportunities.</p> <p>The allocation of authorised pitches will support the operation and running of Travelling Showpeople related industries. There is also the potential for authorised Gypsy and Traveller sites to include employment land on-site.</p> <p>Permanence: Providing opportunities to access the labour market could have permanent effect.</p> <p>Magnitude: Potential for large scale impacts on the Gypsy and Traveller population, although minor for overall economic growth of the region.</p> <p>Scale: Effects are likely to be localised and of a larger significance for the travelling population.</p> <p>Time period: Possible long term effects for the travelling population.</p> <p>Likelihood: Assuming that Gypsy and Traveller groups are willing to participate in mainstream economic activity the identified benefits are considered likely.</p> <p>Secondary and cumulative: Perceptions or prejudices about the Gypsy, Traveller and Travelling</p>	<p>N/A</p>

										<p>Showpeople community include fears that this group is not willing to participate in the mainstream economy and rely on subsidies to survive. Improvement to the communities' access to employment may alter these perceptions.</p>
SA Second Tier Objectives										
To reduce air pollution and ensure air quality continues to improve (Air quality)	To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts (Climate change)	To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry (Road congestion)	To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products (Reducing consumption)	To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resource management (Water quality)	To increase energy efficiency, and the proportion of energy generated from renewable sources in the region	To sustain economic growth and competitiveness across the region (Economic growth)	To stimulate economic revival in priority regeneration areas (Regeneration areas)	To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities (knowledge based economy)	To encourage the development of a buoyant, sustainable tourism sector (Tourism)	To develop and maintain a skilled workforce to support long-term competitiveness of the region.
0	0	0	0	0	0	0	0	0	0	0
<p>Air quality: Although Gypsies and Travellers are heavily reliant on use of the private car, it is not expected that the scale of pitch allocations promoted by these options will have any significant effect in terms of air quality.</p> <p>Climate change: Although Gypsies and Travellers are heavily reliant on use of the private car, and may relatively inefficient use of energy resources in the home in comparison to the settled community, it is not expected that the scale of pitch allocations promoted by these options will have any significant effect in terms of climate change.</p> <p>Road congestion: Gypsies and Travellers are heavily reliant on the use of the private car. There is some potential for highly localised effects in terms of increased road congestion, but it is not thought that these can be considered to be significant at the regional scale.</p> <p>Reducing consumption: Although the baseline evidence is lacking in this area, it is presumed that the Gypsy and Traveller community by their nature are not large consumers in comparison to the settled community.</p>										

Water quality: The Gypsy and Traveller sites are relatively small in scale are not envisaged to have a significant effect on water quality, with any effects, such as those associated with polluted runoff or soil erosion, will be felt downstream from the site but will still be relatively localised.

Energy efficiency: The Gypsy and Traveller sites are not anticipated to have a significant effect on energy efficiency.

Economic growth: Gypsy and Traveller pitches are not considered to have a significant effect on the wider economy.

Regeneration areas: Gypsy and Traveller pitches are not anticipated to have a significant effect on allocated regeneration areas, assuming that they are sensitively located.

Knowledge based economy: Gypsy and Traveller pitches are not envisaged to have a significant effect on the knowledge based economy.

Tourism: Gypsy and Traveller pitches are not considered to have a significant effect on tourism, assuming that they are sensitively located.

Skilled workforce: The nature of industries the Gypsy and Traveller community are currently involved in are and are not envisaged to have a significant effect on the skilled workforce.

SUMMARY

Option A has been found to result in wide ranging benefits. Many of the predicted benefits are based on the assumption that meeting identified need (as promoted by the option) will reduce the number of unauthorised pitches. Unauthorised pitches are not regulated or planned and can have a number of adverse effects which can lead to problems for both the travelling and settled communities and lead to increased tensions and reduced potential for integration between the two communities.

Permanent authorised pitches can allow for the provision of the facilities and infrastructure required to support decent living conditions, such as power and water supplies, toilet and shower facilities, and facilities for animals. Other benefits of well located pitches and sites will include the potential for proximity to employment opportunities to be a consideration and the potential for waste management to be better addressed. Another important point is that provision of pitches will allow many Gypsies and Travellers to have a permanent address, which could also result in wide ranging benefits, for example, allowing Gypsies and Travellers to access education, healthcare and employment.

Importantly, authorised pitches are less likely to negatively affect the receiving environment and population, with fewer impacts on local communities and economies as well as biodiversity, landscape and the historic environment. Well located pitches should also have less potential to result in fear of crime, although this effect is not certain. Lessening conflicts between the travelling and settled communities will help to reduce the barriers that currently prevent Gypsies and Travellers from accessing services and facilities and education and can also help to promote understanding and integration.

The sustainability effects of meeting identified need are broadly positive. It is likely that the most significant benefits will be those experienced by Gypsy and Travellers. Benefits experienced by the settled community can be significant, but will be more localised in scale. Environmental benefits will be localised and in many cases be minor.

RECOMMENDATIONS

- It will be important to ensure that additional pitches do not worsen conditions on existing sites
- Supporting Policy for the allocations can be used to help deliver sustainable construction for the implementation of pitch provision.

Sustainability Appraisal Assessment Matrix
Option B

Summary of supporting evidence	Assessment of outcomes	Nature of Effect: Positive or negative / Permanent or Temporary / Magnitude / Geographical Scale / Time period / Likelihood / Secondary and Cumulative	Mitigation / Recommendation
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To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home = **Negative with considerable uncertainty**

<p>The districts which contain the most unauthorised pitches are Spelthorne which contains 32 pitches, Aylesbury Vale contains 23, Swale contains 26 and Maidstone with 40. (Caravan Count Data, CLG, 2006)</p>	<p>Additional pitch provision of to CLG standards will reduce the need for Gypsies and Travellers to live in unauthorised sites, which tend to associated with poor living conditions.</p> <p>Option B provides only three more pitches than Option A, and so effects will be as a result of redistribution only. If constraints can be shown to vary considerably between authorities then redistribution could potentially limit the number of suitable sites to accommodate new Gypsy and Traveller pitches.</p>	<p>Negative effect: The redistribution of pitches provides approximately the same total at the regional and county level, although there are significant departures from the allocation of pitches required to meet identified needs at the local authority scale. Assuming that Gypsies and Travellers are to some degree tied to a certain location then this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need.</p> <p>Permanence: Permanence of effects are uncertain as this will</p>	<p>Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.</p>
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	<p>Option B reduces the number of pitches to be provided in Reading, a densely populated area. However, it is impossible to say with any certainty that population density, or any other constraint identifies at the strategic scale, necessarily precludes the ability to locate additional pitches in sustainable locations able to meet the housing needs of Gypsies and Travellers.</p>	<p>depend on the length of time permissions for permanent, transit and show people sites will be granted.</p> <p>Magnitude: Effects will be of a significant magnitude for those Gypsies and Travellers who are unable to receive a pitch within the area where they wish to live.</p> <p>Scale: Effects will be felt across much of the region.</p> <p>Time period: The allocation of sites will be brought forward through the statutory Local Development Framework process. The preparation of a site allocation DPD will take from 3-5 years following the adoption of this policy. As a result the effects could be felt in the medium to long term.</p> <p>Likelihood: There is some uncertainty, as many Gypsies and Travellers may be relatively flexible in terms of where they live, although it is not clear <i>how</i> flexible in terms of distance.</p> <p>Secondary and Cumulative: There could be a range of such effects, including those that could result from an increase in unauthorised pitches in areas where need for authorised pitches is not met.</p>	
<p>To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment = Neutral effects (i.e.</p>			

effects are the same as identified for Option A)			
<p>A significant amount of the land in south Shepway is marked as an area at risk of flooding. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p> <p>Pockets of the south coast and a significant amount of land inland are marked as areas at risk of flooding between Portsmouth, Gosport and Havant. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p> <p>The north coast and a significant amount of land inland are marked as areas at risk of flooding in Medway. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p> <p>There are significant areas at risk of flooding in West Oxfordshire, Vale of White Horse, Slough, Swale, Chichester, Havant and Eastbourne. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p>	<p>It is assumed that the guidance in PPS25 will be adhered to and as such few sites will come forward in flood zones.</p> <p>Where sites are located outside of floodplains the levels of pitch provision will not be sufficiently large enough to alter water movement in a catchment in a way that increases flood risk elsewhere.</p> <p>Shepway has an increased provision of pitches (2 to 16). Medway has an increased provision (14 to 40). A significant amount of land in these areas is at risk of flooding.</p>	<p>Neutral effect: It is likely that, even though this Option allocates a greater number of pitches to authorities with greater amounts of land at risk from flooding, that suitable planning criteria will ensure that pitches are not located in areas at risk. Therefore, the effects of this option can not be shown to differ significantly from the effects associated with Option A.</p>	<p>N/A</p>
<p>To improve the health and well-being of the population and reduce inequalities in health = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>The Gypsy and Traveller community were less likely to be</p>	<p>Providing authorised pitches, both for permanent and transit</p>	<p>Neutral effect: This option does increase the number of pitches</p>	<p>It will be important to monitor the effects of Gypsy and Traveller</p>

<p>registered with a Doctor than the settled community. The worst instance was in East Sussex where only 45.3% of surveyed households were registered with a doctor in the area compared with 96.8 of the settled community. (Supplementary Scoping Report p 17)</p> <p>From the needs assessment it has shown that the Gypsy and Traveller community suffer from high levels of disability. The worst instances were recorded in Chichester, West Sussex where 76% of the respondents stated that they or a member of their family had a disability. (Supplementary Scoping Report p 17)</p>	<p>needs, will provide opportunities for local authorities to increase accessibility to health services, through physical proximity and a permanent address from which to register with health services.</p> <p>Conditions on authorised sites are significantly higher than unauthorised encampments, which offer no facilities. However, existing authorised sites still report health problems.</p> <p>There is the potential for additional pitches to stretch existing health facilities beyond capacity if new sites are not well located. In this sense this option <i>could</i> have the potential to exacerbate health issues in health deprived areas such as Bracknell Forest (+11)</p> <p>Swale, which has significant health deprivation, has reduced its pitch provision by over 40.</p>	<p>allocated to some of the more deprived authorities in the region. However, it is not thought that average levels of health deprivation experienced within a local authority is a significant constraint to the allocation of pitches, nor will the allocation of pitches act to compound existing health deprivation assuming that planning criteria act to ensure that pitches are not allocated in areas where they will place a burden on health facilities that are already at or above capacity. Therefore the redistribution of pitches will lead to effects that are not discernibly different from Option A in terms of this Objective.</p>	<p>sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.</p>
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>Most families reported some concern in respect to basic facilities ranging from access to a toilet to waste in varying degrees. However East Sussex</p>	<p>Assuming that pitches are well located and planned for they could help to reduce ill-feeling towards the travelling community as a result of</p>	<p>Neutral effect: This option will result in a greater number of Gypsy and Traveller pitches allocated to some of the more deprived districts in the South</p>	<p>It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.</p>

<p>faired the worst with only 15.9% of households living on sites have sole access to a water supply and only 31.7% have sole access to a WC (Supplementary Scoping Report p.22).</p> <p>Pockets of the regions worst deprivation are experienced in Brighton, Bracknell Forest, Adur, Shepway, Medway, Swale, Gosport, Havant, Southampton and Portsmouth (SA Report for the Draft SE Plan, Annex B, p.33, 2006).</p>	<p>reducing unauthorised pitches and sites. Poorly located sites would include sites in close proximity to existing pockets of poverty and deprivation, where there would be the potential for Gypsy and Traveller pitches to hinder socio-economic regeneration.</p> <p>Providing the means for the travelling community to have a permanent address will help to reduce barriers to employment and in turn this could help to impact on deprivation experienced by this group.</p> <p>Shepway has increased its provision of pitches by 14, Adur by 9 and Bracknell Forest by 11. Medway has increased the number of pitches it is providing from 14 to 40. These are some of the more deprived districts.</p>	<p>East. However, it is likely that appropriate planning criteria can ensure that Gypsy and Traveller pitches do not impact on existing pockets of deprivation. Therefore, the redistribution of pitches will lead to effects that are not discernibly different from Option A in terms of this Objective.</p>	
<p>To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>Pockets of the regions worst education deprivation are experienced in the Thames Gateway in Dartford, Gravesend and the Medway towns and on the South Coast in Hastings, Brighton, Gosport, Havant, Shepway, Southampton and</p>	<p>High levels of evictions from unauthorised sites can cause family groups to move often. This reduces the likelihood of children being enrolled in and attending school. The provision of pitches should provide a permanent address and help</p>	<p>Neutral effect: This Option will result in a greater number of Gypsy and Traveller pitches to be allocated to some of the districts with greater education deprivation. However, it is likely that appropriate planning criteria can ensure that Gypsy and</p>	<p>It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.</p>

<p>Portsmouth. (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p>	<p>increase access to educational facilities for those who currently have poor access. However, it should be noted that the needs assessments repeat that problems with access to education exist on existing authorised sites.</p> <p>However, it is not just physical access to schools that causes problems. There are low enrolment issues as a result of bullying and also an inability to integrate. These are issues that pitch provision alone will struggle to counter.</p> <p>Shepway and Medway have pockets of some of the worst education and skills in the South East. Both districts will receive a greater number of pitches under this Option.</p> <p>Providing a large number of additional pitches at poorly located sites could potentially stretch educational facilities beyond capacity, which will be a particularly significant in areas suffering from education deprivation.</p>	<p>Traveller pitches are located where there is adequate access to educational facilities. Therefore, the redistribution of pitches will lead to effects that are not discernibly different from Option A in terms of this Objective.</p>	
<p>To reduce crime and the fear of crime = Negative with some uncertainty</p>			

<p>The regions worst pockets of crime and disorder deprivation are experienced in the Thames Gateway in Dartford, Medway, Hastings, Brighton, Gosport, Havant, Southampton and Portsmouth. Furthermore there are severe pockets of deprivation in Oxford, Slough and Reading (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p>	<p>The tensions between the settled and Gypsy and Traveller communities may be attributed in part to unauthorised encampment and the associated issues, including, for example, visual intrusion and issues of waste. As a result well-located permanent pitches may reduce levels of harassment.</p> <p>However, it is not just physical access to schools that causes problems. There are low enrolment issues as a result of bullying and also an inability to integrate. These are issues that pitch provision alone will struggle to counter.</p> <p>However, directing a large number of additional pitches to an area could also increase fear of crime, which will be particularly significant where levels of crime and fear of crime are already high.</p> <p>Medway has significant existing levels of crime and will receive an increase of 26 pitches under this option.</p>	<p>Negative effects: It is felt that existing crime statistics at the local authority scale must be a serious consideration when allocating pitches. Therefore, to increase the allocation of pitches beyond the level that is required to meet needs, in areas that have high existing levels of crime such as Medway, could have a significant effect in terms of compounding problems of crime, or at least fear of crime. It is likely that this effect could be mitigated to a degree through careful planning at the local level.</p> <p>Permanence: Crime can be addressed retrospectively and so effects may not be permanent. Furthermore, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities.</p> <p>Magnitude: Magnitude of effects will vary dependent on existing levels of fear of crime</p> <p>Scale: Increased fear of crime attributed to Gypsies and Travellers will not be localised,</p>	<p>Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).</p>
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		<p>rather it will be felt at the sub-local authority scale.</p> <p>Time period: Effects could occur in the short and long-term.</p> <p>Likelihood: In many instances well located new pitches and sites will have no effect on crime or fear of crime.</p> <p>There is also the potential for this option to result in an increase in the number of unauthorised pitches, although whether or not this will occur is uncertain, and so risk of this option leading to unauthorised pitches which will in turn result in impacts in terms of this objective is very uncertain.</p> <p>Secondary and cumulative: Fear of crime can compound a range of socio-economic problems, particularly in terms of social exclusion, and hinder socio-economic regeneration.</p>	
To create and sustain vibrant communities = Negative effects with considerable uncertainty			
<p>There are pockets of living environment deprivation across the region (within the bottom 20-40%) however the worst conditions are found on the South Coast in Gosport, Havant, Southampton and Portsmouth. (SA Report for the Draft SE Plan, Annex B, p.48, 2006)</p>	<p>Provision of additional Gypsy and Traveller pitches will decrease the number of people forced to live at unauthorised sites, where conditions are likely to be worse, and there is less chance for harmonious relationships to develop.</p>	<p>Negative effects: This Option promotes delivery of a level of new pitches above identified need in a number of districts, which may mean that there is greater potential for Gypsies and Travellers to impact on settled communities. This effect may be particularly significant where such settled communities</p>	<p>Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical</p>

	<p>Areas which suffer from deprivation, crime and disorder, low levels of education attainment, and unemployment should focus on regeneration. Increased pitch provision in these areas over and above the estimated need may hamper regeneration if pitches are not located carefully. Areas that fall under these categories where significant increases have been proposed include, Medway, Dover and Thanet.</p> <p>Conversely, quality of life and vibrant Gypsy and Traveller communities will be promoted through additional pitches in those areas where currently a large number of families are living on unauthorised pitches, particularly in Tonbridge and Malling.</p> <p>Swale and Sevenoaks are two authorities where there are currently a high number of unauthorised sites, but this option promotes a level of delivery of new pitches below the identified need. There is therefore potential in these districts for the formation of vibrant Gypsy and Traveller communities to be hindered.</p>	<p>are already weak and in need of regeneration. However, this effect may well be adequately mitigated through appropriate locational and other planning criteria. What is perhaps of greater likelihood and significance is the risk that this Option promotes a level of pitch provision below identified needs in some districts. Not meeting identified needs may hinder the ability for Gypsies and Travellers to form vibrant communities.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will be granted for.</p> <p>Magnitude: The relationship between the distribution and pitch provision, and the creation and maintenance of vibrant communities, is not direct. Therefore it is not clear that the magnitude of the effect will be great on either the settled or Gypsy and Traveller communities.</p> <p>Scale: Has the potential to impact upon both the settled and Gypsy and Traveller communities in certain districts.</p> <p>Time period: Community</p>	<p>area that will suit Gypsies and Travellers and ensure that their needs as a community are met.</p>
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		<p>vibrancy is not something that can be created or destroyed over-night.</p> <p>Likelihood: There is a great deal of uncertainty. Good location of new pitches can ensure that settled communities are not impacted upon. Furthermore, in many instances Gypsy and Traveller families will consider moving to authorised pitches outside of the district in which they currently reside.</p> <p>Inappropriate, visually intrusive, unauthorised encampments can generate negative perceptions of the Gypsy and Traveller community. The provision of appropriate public pitches may through the improvement of living conditions help to strengthen the Gypsy and Traveller community. In addition this may alleviate negative impacts on those areas of the settled community, which contain unauthorised sites. .</p>	
<p>To improve accessibility to all services and facilities = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>No evidence related to spatial variation in access to services and facilities</p>	<p>Improving access will firstly involve physically locating sites in good proximity to existing services and facilities such as schools, doctor's surgeries, and dentists. However, the</p>	<p>Neutral effects: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which</p>	<p>N/A</p>

	<p>constraints that can stop Gypsy, Traveller, and Travelling Showpeople accessing all services and facilities are more than just physical. In some cases there are restrictions to access due to tensions between the Gypsy and Traveller and settled community.</p>	<p>are allocated a greater number of pitches under this Option would not be able to provide an adequate level of accessible services and facilities to serve new pitches</p>	
<p>To encourage increased engagement in cultural activity across all sections of the community in the South East = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>In general there is a lack of information and awareness of the Gypsy and traveller cultures and traditions.</p>	<p>It is important to create the conditions whereby the cultural traditions of the Gypsy, Traveller and Travelling Showpeople communities can be maintained.</p> <p>It is possible that respect for cultural traditions will be something that is able to bring the settled and Gypsies and Traveller communities closer together.</p> <p>It is important that efforts to improve living conditions for Gypsies and Travellers are not focused on trying to make them more settled people.</p> <p>It is possible that where this Option results in a greater number of pitches in a certain area, that this could put</p>	<p>Neutral Effect: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which are allocated a greater number of pitches under this Option would not be able to integrate Gypsies and Travellers in such a way that allows for cultural engagement and understanding.</p>	<p>N/A</p>

	<p>additional strain on relations between the Gypsy and Traveller and settled communities, which in turn reduce cultural engagement and understanding. However, such effects would be highly indirect, and it would be difficult to identify any causal relationship.</p>		
<p>To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>The availability of land in urban and rural locations varies through the region. Available land on the Isle of Wight is exclusive rural in its location, Kent and Berkshire both have approximately 85% of available land in rural locations. East Sussex and Hampshire have a roughly equal split between rural and urban locations whilst in West Sussex approximately 70% of available stock is urban based (SA Report for the Draft SE Plan, Annex B, p.55, 2006).</p>	<p>Unauthorised sites are generally located in inappropriate locations. The allocation of permanent and transit pitches in the most sustainable locations will support the general principle of land efficiency.</p> <p>However the allocation of Gypsy and Traveller and Travelling Showpeople sites on previously developed land may not be seen as the most sustainable re-use of land in areas with competing pressures for other uses such as affordable housing.</p> <p>It will be important that districts allocated a greater number of pitches under this option than is required to meet their identified need are able to locate additional pitches in a way that makes an efficient use of land.</p>	<p>Neutral effect: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which are allocated a greater number of pitches under this Option would not be able to integrate further pitches in such a way that makes an efficient use of land.</p>	<p>N/A</p>

	<p>There is little data on the availability of suitable land and so it is impossible to tell at this level whether an authority would be able to accommodate additional pitches making use of land efficiently.</p>		
<p>To conserve and enhance the region's biodiversity = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>Gypsy and Traveller site provision within the districts of Hastings, Rother, Brighton & Hove, Eastbourne, Chichester, Arun, Worthing, Adur, Canterbury, Dover, Shepway, Thanet, Dartford, Gravesham, Medway, Swale, New Forest, Eastleigh, Farnham, Gosport, Havant, Southampton, Portsmouth or the Isle of Wight could cause a significant adverse effect on European sites. (AA Screening Report, p.15, 2007)</p> <p>A significant amount of the region is designated as Area of Outstanding Natural Beauty. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p> <p>The majority of West Berkshire is designated as part of the North Wessex Downs Areas of Outstanding Natural Beauty. (Submitted, SA, Annex B, p.67,</p>	<p>The effects of the option on this SA Objective will be dependant on location.</p> <p>Potential adverse impacts on biodiversity could result from noise and waste if sites are in close proximity. Biodiversity sites could also come under pressure from grazing for animals kept by the travelling community.</p> <p>Brighton and Hove, The New Forest, Chiltern, Wycombe, West Berkshire, Arun, Worthing, Adur, Dover, Swale, Sevenoaks and Tunbridge Wells contain significant amount of land designated as either a National Park or AONB.</p> <p>In these areas, the proposed increases are in West Berkshire (9), Adur (9), Dover (24) and Tunbridge Wells (5).</p>	<p>Neutral effect: This option does promote increased pitch provision in authorities with nationally or internationally important biodiversity resources. However, it has been judged that there is no discernible difference in the effects associated with Option B, as opposed to Option A. This is because there is no evidence to suggest that extra pitches cannot be located in areas where potential negative impacts are minimised. The presence or not of internationally important biodiversity sites within an authority is not an adequate indicator of whether that authority can accept additional pitches without biodiversity impacts.</p>	<p>A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.</p>

<p>2006)</p> <p>A significant amount of south Wycombe is designated as an Area of Outstanding Natural Beauty. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p> <p>The south Downs was is a designated national park, which is a sizable border along the eastern border of Adur. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p> <p>Large central sections of Sevenoaks are designated as an Area of Outstanding Natural Beauty as part of the North Downs Way. (Submitted, Scoping Report, Annex B, p.67, 2006)</p>	<p>Decreases are seen in Swale (43) and Sevenoaks (64)</p> <p>It is anticipated that any emerging Site Allocations DPD would be accompanied by an AA screening report to ensure that proposed allocations especially in areas such as Medway do not affect the integrity of European Sites.</p> <p>The allocation of sites should be in accordance with PPS9, Thames Basin Heath SPA Draft Interim Strategic Delivery Plan, and other national, regional, and local Biodiversity Action Plans.</p>		
<p>To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>There is little available evidence to inform the assessment against this objective.</p>	<p>Sites for Gypsies, Travellers and Showpeople could have significant visual effects and therefore the countryside and historic environment would need to be a consideration in implementing the allocations.</p>	<p>Neutral effect: This option does promote increased pitch provision in authorities with nationally important historic and landscape resources. However, it has been judged that there is no discernible difference in the effects associated with Option B, as opposed to Option A. This is because there is no evidence to suggest that extra pitches</p>	<p>N/A</p>

		cannot be located in areas where potential negative impacts are minimised. Furthermore, it may be that increasing the number of pitches in a district reduces the potential for unauthorised pitches in close proximity to sensitive sites.	
To reduce waste generation and disposal and achieve the sustainable management of waste = Neutral effects (i.e. effects are the same as identified for Option A)			
Recycling rates are low (below 10%) and of particular issue in Dover, Thanet, Eastbourne, Dartford, Runnymede, Epsom and Ewell and Gosport (SA Report for the Draft SE Plan, Annex B, p.96, 2006)	Allocations alone will not impact on sustainable waste management. However, in implementing this option waste facilities should be a consideration. In order to meet the desire to reduce the amount of waste going to landfill recycling facilities need to be increased, including on Gypsy, Traveller, and Travelling Showpeople sites. Education and awareness on the importance of recycling will also assist in levels of recycling for the settled and Gypsy, Traveller and travelling Showpeople community.	Neutral effect: There is no evidence to suggest that there will be any discernable difference in effects associated with this option, as opposed to Option A.	N/A
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region = Neutral effects (i.e. effects are the same as identified for Option A)			
There are pockets of employment deprivation in the region, where employment rates	Providing a permanent address will provide an opportunity for the Gypsy and Traveller	Neutral effect: There is no evidence to suggest that there will be any	N/A

<p>are lower than the SE average in the following districts. Dover, Thanet, Shepway, Canterbury, Sevenoaks, Oxford, Slough, Gosport, Havant and Hastings. (SA Report for the Draft SE Plan, Annex B, p.113, 2006).</p> <p>Economic inactivity is a particular issue for the following districts. Dover, Thanet, Shepway, Canterbury, Hastings, Tunbridge Wells, Oxford, Slough, Winchester, Gosport, Elmbridge and Woking. (SA Report for the Draft SE Plan, Annex B, p.116, 2006)</p> <p>The lowest employment levels are recorded in Hastings, Slough, Canterbury, Dover, Thanet, Gosport and Havant. (SA Report for the Draft SE Plan, Annex B, p.116, 2006)</p>	<p>population to overcome one of the barriers to employment.</p> <p>In order to improve the Gypsy, Traveller and Showpeople community's contribution to the local economy the root causes need to be addressed (i.e. the community benefit least from education and training compared to the settled community. However, permanent pitches alone cannot break down all of the barriers to enter the traditional economy</p> <p>Dover, Thanet and Shepway are all allocated significantly more sites under this Option than is the case under Option A. These districts also have significant issues regarding economic deprivation. It is not clear that relative economic deprivation will impact upon Gypsies and Travellers, particularly given that additional pitches will not be located in urban centres, where deprivation is most focused. For this reason also, it is not thought that accommodating the extra numbers of Gypsies and Travellers proposed by this option will further increase deprivation in the wider District, or hinder regeneration.</p>	<p>discernable difference in effects associated with this option, as opposed to Option A.</p>	
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SA Second Tier Objectives									
To develop and maintain a skilled workforce to support long-term competitiveness of the region.	0								
To encourage the development of a buoyant, sustainable tourism sector (Tourism)	0								
To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities (knowledge based economy)	0								
To stimulate economic revival in priority regeneration areas (Regeneration areas)	0								
To sustain economic growth and competitiveness across the region (Economic growth)	0								
To increase energy efficiency, and the proportion of energy generated from renewable sources in the region	0								
To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resource management (Water quality)	0								
To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products (Reducing consumption)	0								
To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry (Road congestion)	0								
To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts (Climate change)	0								
To reduce air pollution and ensure air quality continues to improve (Air quality)	0								

It is not expected that the redistribution of pitch allocations promoted by this option will result in effects against any of the second tier objectives that differ significantly from the effects associated with Option A.

SUMMARY

Option B allocates roughly the same number of new pitches to each county as is the case under Option A although at the district level there are significant differences between the two options. The greatest departures from the allocations identified as being required to meet needs (as set out in Option A), are in Kent, with significant increases in Ashford (20), Dover (24), Medway (26) and Tonbridge and Malling (16) and significant decreases in Sevenoaks (64) and Swale (43). There are also some changes made to allocations between the Berkshire authorities, with Bracknell Forest, West Berkshire and Wokingham receiving more pitches under this Option, and Slough and Windsor and Maidenhead receiving fewer pitches, although the numbers of pitches that make up the difference between the two options is of a lower magnitude (generally less than 15) than in Kent.

The appraisal has found that, for the majority of SA Objectives, the effects associated with this Option will not be significantly different to Option A. This is because the evidence of constraints (for example related to flood risk, biodiversity, landscape, waste, employment and access to services and facilities) at the local authority scale is insufficient to conclude that additional pitches could not be delivered in a sustainable fashion.

In terms of some other Sustainability Objectives - notably health, poverty and education – there is some potential for existing issues to act as a significant constraint to the ability of new pitches to be brought forward in a sustainable fashion within an area. Furthermore,

increased pitch provision or an increased likelihood of unauthorised pitches could exacerbate existing issues in some areas. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives. For example, even within an authority that suffers from relatively high levels of deprivation, it will be possible to ensure that pitches are located in areas where the ability of Gypsies and Traveller communities to thrive is not hindered, and existing baseline conditions are not compounded or exacerbated by the presence of Gypsy and Traveller pitches.

The appraisal against three of the Objectives highlighted that there may be negative sustainability implications associated with promoting an allocation of pitches that departs from the allocation identified as necessary to meet identified needs.

Firstly, and most importantly, this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. Effects are somewhat uncertain as in many instances delivery of a level of pitches below identified needs in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority. However, in some instances it is likely that Gypsies and Travellers will not consider the offer of a pitch in a nearby authority to that which they would preferably want to live, as meeting their housing needs. Related to this, there is also the potential for this option to prevent the development of vibrant Gypsy and Traveller communities.

Secondly, it was considered that baseline crime statistics at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of fear of crime at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

Recommendations for the distribution of pitches

- Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of

deprivation will be acceptable.

- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.
- Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).
- Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.
- A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.

Sustainability Appraisal Assessment Matrix
Option C

Summary of supporting evidence	Assessment of outcomes	Nature of Effect: Positive or negative / Permanent or Temporary / Magnitude / Geographical Scale / Time period / Likelihood / Secondary and Cumulative	Mitigation / Recommendation
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To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home = **Negative with some uncertainty**

<p>The districts which contain the most unauthorised pitches are Spelthorne which contains 32 pitches, Aylesbury Vale contains 23, Swale contains 26 and Maidstone with 40. (Caravan Count Data, CLG, 2006)</p>	<p>Additional pitch provision of to CLG standards will reduce the need for Gypsies and Travellers to live in unauthorised sites, which tend to associated with poor living conditions.</p> <p>Option C provides only eight more pitches than Option A, and so effects will be as a result of redistribution only. If constraints can be shown to vary considerably between authorities then redistribution could potentially limit the number of suitable sites to accommodate new Gypsy and Traveller pitches.</p>	<p>Negative effect: The redistribution of pitches provides approximately the same overall regional total. At county level this option promotes a redistribution of pitches. Assuming that Gypsies and Travellers are to some degree tied to a certain location, or at least a certain county, then this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need.</p> <p>Permanence: Effects will be relatively permanent.</p> <p>Magnitude: Effects will be of a</p>	<p>Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.</p>
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	<p>Option C allocates more pitches to Hampshire and the Isle of Wight than there is a need identified for (146, which represents an increase of 150%). Option C allocates a level of pitch provision significantly below levels of identified need to Surrey (-84) and Kent (-91). At a finer scale it allocates significantly more pitches to Cherwell and the Vale of the White Horse (Oxfordshire) and Aylesbury Vale (Buckinghamshire). Option C allocates a level of pitch provision significantly below levels of identified need to the districts of South Bucks (Buckinghamshire) and Chichester (West Sussex)</p>	<p>significant magnitude for those Gypsies and Travellers who are unable to receive a pitch within the area where they wish to live.</p> <p>Scale: Effects will be felt across much of the region.</p> <p>Time period: The allocation of sites will be brought forward through the statutory Local Development Framework process. The preparation of a site allocation DPD will take from 3-5 years following the adoption of this policy. As a result the effects could be felt in the medium to long term.</p> <p>Likelihood: There is some uncertainty, as many Gypsies and Travellers may be relatively flexible in terms of where they live, although it is not clear <i>how</i> flexible in terms of distance.</p> <p>Secondary and Cumulative: There could be a range of such effects, including those that could result from an increase in unauthorised pitches in areas where need for authorised pitches is not met.</p>	
<p>To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>A significant amount of the land in south Shepway is marked as an area at risk of flooding. (SA Report for the Draft SE Plan,</p>	<p>It is assumed that the guidance in PPS25 will be adhered to and as such few sites will come forward in flood zones.</p>	<p>Neutral effect: It is likely that, even if this Option were to create greater pressure to deliver pitches in authorities with</p>	<p>N/A</p>

<p>Annex B, p.20, 2006)</p> <p>Pockets of the south coast and a significant amount of land inland are marked as areas at risk of flooding between Portsmouth, Gosport and Havant. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p> <p>The north coast and a significant amount of land inland are marked as areas at risk of flooding in Medway. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p> <p>There are significant areas at risk of flooding in West Oxfordshire, Vale of White Horse, Slough, Swale, Chichester, Havant and Eastbourne. (SA Report for the Draft SE Plan, Annex B, p.20, 2006)</p>	<p>Where sites are located outside of floodplains the levels of pitch provision will not be sufficiently large enough to alter water movement in a catchment in a way that increases flood risk elsewhere.</p>	<p>greater amounts of land at risk from flooding, that suitable planning criteria will ensure that pitches are not located in areas at risk.</p>	
<p>To improve the health and well-being of the population and reduce inequalities in health = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>The Gypsy and Traveller community were less likely to be registered with a Doctor than the settled community. The worst instance was in East Sussex where only 45.3% of surveyed households were registered with</p>	<p>Providing authorised pitches, both for permanent and transit needs, will provide opportunities for Local Authorities to increase accessibility to health services, through physical proximity and a permanent address from which</p>	<p>Neutral effect: It is not thought that average levels of health deprivation experienced within a local authority is a significant constraint to the allocation of pitches, nor will the allocation of pitches act to compound</p>	<p>It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.</p>

<p>a doctor in the area compared with 96.8 of the settled community. (Supplementary Scoping Report p 17)</p> <p>From the needs assessment it has shown that the Gypsy and Traveller community suffer from high levels of disability. The worst instances were recorded in Chichester, West Sussex where 76% of the respondents stated that they or a member of their family had a disability. (Supplementary Scoping Report p 17)</p>	<p>to register with health services.</p> <p>Conditions on authorised sites are significantly higher than unauthorised encampments, which offer no facilities. However, existing authorised sites still report health problems.</p> <p>There is the potential for additional pitches to stretch existing health facilities beyond capacity if new sites are not well located. In this sense this option <i>could</i> have the potential to exacerbate health issues in health deprived areas such as Bracknell Forest (+10)</p> <p>Swale, which has significant health deprivation, has reduced its pitch provision by over 56.</p>	<p>existing health deprivation assuming that planning criteria act to ensure that pitches are not allocated in areas where they will place a burden on health facilities that are already at or above capacity.</p>	
<p>To reduce poverty and social exclusion and close the gap between the most deprived areas in the South East and the rest of the region = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>Most families reported some concern in respect to basic facilities ranging from access to a toilet to waste in varying degrees. However East Sussex fared the worst with only 15.9% of households living on sites have sole access to a water supply and only 31.7% have sole access to a WC</p>	<p>Assuming that pitches are well located and planned for they could help to reduce ill-feeling towards the travelling community as a result of reducing unauthorised pitches and sites. Poorly located sites would include sites in close proximity to existing pockets of poverty and deprivation, where</p>	<p>Neutral effect: It is not thought that the levels of deprivation experienced by a local authority is a significant constraint to the allocation of pitches, nor will the allocation of pitches act to compound existing deprivation. It is likely that appropriate planning criteria can ensure that Gypsy and Traveller pitches do</p>	<p>It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.</p>

<p>(Supplementary Scoping Report p.22).</p> <p>Pockets of the regions worst deprivation are experienced in Brighton, Bracknell Forest, Adur, Shepway, Medway, Swale, Gosport, Havant, Southampton and Portsmouth (SA Report for the Draft SE Plan, Annex B, p.33, 2006).</p>	<p>there would be the potential for Gypsy and Traveller pitches to hinder socio-economic regeneration.</p> <p>Providing the means for the travelling community to have a permanent address will help to reduce barriers to employment and in turn this could help to impact on deprivation experienced by this group.</p> <p>Significant increases in provision of pitches are noted in Medway (16), Bracknell Forest (10) and Shepway (10). These are some of the most deprived districts in the South East</p> <p>There is a significant decrease in the number of pitches allocated to Swale (-56), another relatively deprived authority.</p>	<p>not impact on existing pockets of deprivation. Therefore, the redistribution of pitches will lead to effects that are not discernibly different from Option A in terms of this Objective.</p>	
<p>To raise educational achievement across the region and develop the opportunities for everyone to acquire the skills needed to find and remain in work = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>Pockets of the regions worst education deprivation are experienced in the Thames Gateway in Dartford, Gravesend and the Medway towns and on the South Coast in Hastings, Brighton, Gosport, Havant, Shepway, Southampton and</p>	<p>High levels of evictions from unauthorised sites can cause family groups to move often. This reduces the likelihood of children being enrolled in and attending school. The provision of pitches should provide a permanent address and help</p>	<p>Neutral effect: This Option will result in a greater number of Gypsy and Traveller pitches to be allocated to some of the districts with greater education deprivation. However, it is likely that appropriate planning criteria can ensure that Gypsy and</p>	<p>It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.</p>

<p>Portsmouth. (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p>	<p>increase access to educational facilities for those who currently have poor access. However, it should be noted that the needs assessments repeat that problems with access to education exist on existing authorised sites.</p> <p>However, it is not just physical access to schools that causes problems. There are low enrolment issues as a result of bullying and also an inability to integrate. These are issues that pitch provision alone will struggle to counter.</p> <p>Providing a large number of additional pitches at poorly located sites could potentially stretch educational facilities beyond capacity, which will be a particularly significant in areas suffering from education deprivation.</p>	<p>Traveller pitches are located where there is adequate access to educational facilities. Therefore, the redistribution of pitches will lead to effects that are not discernibly different from Option A in terms of this Objective.</p>	
<p>To reduce crime and the fear of crime = Negative with some uncertainty</p>			
<p>The regions worst pockets of crime and disorder deprivation are experienced in the Thames Gateway in Dartford, Medway, Hastings, Brighton, Gosport, Havant, Southampton and Portsmouth. Furthermore there</p>	<p>The tensions between the settled and Gypsy and Traveller communities may be attributed in part to unauthorised encampment and the associated issues, including, for example, visual intrusion and issues of</p>	<p>Negative effects: It is felt that existing crime statistics at the local authority scale must be a serious consideration when allocating pitches. Therefore, to increase the allocation of pitches beyond the level that is</p>	<p>Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy</p>

<p>are severe pockets of deprivation in Oxford, Slough and Reading (SA Report for the Draft SE Plan, Annex B, p.38, 2006)</p>	<p>waste. As a result well-located permanent pitches may reduce levels of harassment.</p> <p>However, directing a large number of additional pitches to an area could also increase fear of crime, which will be particularly significant where levels of crime and fear of crime are already high.</p> <p>Change is noted within the regions pockets of crime disorder. Significant increases are proposed in Medway (16), However, significant decreases are proposed in Dartford (-17), Gravesham (-9)</p>	<p>required to meet needs, in areas that have high existing levels of crime such as Medway, could have a significant effect in terms of compounding problems of crime, or at least fear of crime. It is likely that this effect could be mitigated to a degree through careful planning at the local level.</p> <p>Permanence: Crime can be addressed retrospectively and so effects may not be permanent. Furthermore, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities</p> <p>Magnitude: Magnitude of effects will vary dependent on existing levels of fear of crime</p> <p>Scale: Increased fear of crime attributed to Gypsies and Travellers will not be localised, rather it will be felt at the sub-local authority scale.</p> <p>Time period: Effects could occur in the short and long-term.</p> <p>Likelihood: In many instances well located new pitches and sites will have no effect on crime</p>	<p>of fear of crime).</p>
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		<p>or fear of crime.</p> <p>There is also the potential for this option to result in an increase in the number of unauthorised pitches, although whether or not this will occur is uncertain, and so risk of this option leading to unauthorised pitches which will in turn result in impacts in terms of this objective is very uncertain.</p> <p>Secondary and cumulative: Fear of crime can compound a range of socio-economic problems, particularly in terms of social exclusion, and hinder socio-economic regeneration.</p>	
To create and sustain vibrant communities = Negative effects with some uncertainty			
<p>There are pockets of living environment deprivation across the region (within the bottom 20-40%) however the worst conditions are found on the South Coast in Gosport, Havant, Southampton and Portsmouth. (SA Report for the Draft SE Plan, Annex B, p.48, 2006)</p>	<p>Provision of additional Gypsy and Traveller pitches will decrease the number of people forced to live at unauthorised sites, where conditions are likely to be worse, and there is less chance for vibrant communities and harmonious relationships with the settled community to develop.</p> <p>Areas which suffer from deprivation, crime and disorder, low levels of education attainment, and unemployment should focus on regeneration. Increased pitch provision in</p>	<p>Negative effects: This Option promotes delivery of a level of new pitches above identified need in a number of districts, which may mean that there is greater potential for Gypsies and Travellers to impact on settled communities. This effect may be particularly significant where such settled communities are already weak and in need of regeneration. However, this effect may well be adequately mitigated through appropriate locational and other planning criteria. What is perhaps of greater likelihood and</p>	<p>Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.</p>

	<p>these areas over and above the estimated need may hamper regeneration if pitches are not located carefully. Areas that fall under these categories where significant increases have been proposed include, Medway, Dover and Thanet, although all of these districts are allocated fewer additional pitches under this option than is the case under Option B.</p> <p>Conversely, quality of life and vibrant Gypsy and Traveller communities will be promoted through additional pitches in those areas where currently a large number of families are living on unauthorised pitches, particularly in Tonbridge and Malling.</p> <p>Swale and Sevenoaks are two authorities where there are currently a high number of unauthorised sites, but this option promotes a level of delivery of new pitches below the identified need (more so under this option than is the case for Option B). There is therefore potential in these districts for the formation of vibrant Gypsy and Traveller communities to be hindered.</p>	<p>significance is the risk that this Option promotes a level of pitch provision below identified needs in some districts. Not meeting identified needs may hinder the ability for Gypsies and Travellers to form vibrant communities.</p> <p>Permanence: Permanent effects uncertain as this will depend on the length of time permissions for permanent, transit and show people sites will be granted for.</p> <p>Magnitude: The relationship between the distribution and pitch provision, and the creation and maintenance of vibrant communities, is not direct. Therefore it is not clear that the magnitude of the effect will be great on either the settled or Gypsy and Traveller communities.</p> <p>Scale: Has the potential to impact upon both the settled and Gypsy and Traveller communities in certain districts.</p> <p>Time period: Community vibrancy is not something that can be created or destroyed over-night.</p> <p>Likelihood: There is some uncertainty. Good location of new pitches can ensure that settled communities are not</p>	
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		<p>impacted upon. Furthermore, in many instances Gypsy and Traveller families will consider moving to authorised pitches outside of the district in which they currently reside.</p> <p>Inappropriate, visually intrusive, unauthorised encampments can generate negative perceptions of the Gypsy and Traveller community. The provision of appropriate public pitches may through the improvement of living conditions help to strengthen the Gypsy and Traveller community. In addition this may alleviate negative impacts on those areas of the settled community, which contain unauthorised sites. .</p>	
To improve accessibility to all services and facilities			
<p>No evidence related to spatial variation in access to services and facilities</p>	<p>Improving access will firstly involve physically locating sites in good proximity to existing services and facilities such as schools, doctor's surgeries, and dentists. However, the constraints that can stop Gypsy, Traveller, and Travelling Showpeople accessing all services and facilities are more than just physical. In some cases there are restrictions to access due to tensions between</p>	<p>Neutral effects: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which are allocated a greater number of pitches under this Option would not be able to provide an adequate level of accessible services and facilities to serve new pitches.</p>	<p>N/A</p>

	the Gypsy and Traveller and settled community.		
To encourage increased engagement in cultural activity across all sections of the community in the South East = Neutral effects (i.e. effects are the same as identified for Option A)			
<p>In general there is a lack of information and awareness of the Gypsy and traveller cultures and traditions.</p>	<p>It is important to create the conditions whereby the cultural traditions of the Gypsy, Traveller and Travelling Showpeople communities can be maintained.</p> <p>It is possible that respect for cultural traditions will be something that is able to bring the settled and Gypsies and Traveller communities closer together.</p> <p>It is important that efforts to improve living conditions for Gypsies and Travellers are not focused on trying to make them more settled people.</p> <p>It is possible that where this Option results in a greater number of pitches in a certain area, that this could put additional strain on relations between the Gypsy and Traveller and settled communities, which in turn reduce cultural engagement and understanding. However, such effects would be highly indirect,</p>	<p>Neutral Effect: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which are allocated a greater number of pitches under this Option would not be able to integrate Gypsies and Travellers in such a way that allows for cultural engagement and understanding.</p>	<p>N/A</p>

	and it would be difficult to identify any causal relationship.		
To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings and encourage urban renaissance = Neutral effects (i.e. effects are the same as identified for Option A)			
<p>The availability of land in urban and rural locations varies through the region. Available land on the Isle of Wight is exclusive rural in its location, Kent and Berkshire both have approximately 85% of available land in rural locations. East Sussex and Hampshire have a roughly equal split between rural and urban locations whilst in West Sussex approximately 70% of available stock is urban based (SA Report for the Draft SE Plan, Annex B, p.55, 2006).</p>	<p>Unauthorised sites are generally located in inappropriate locations. The allocation of permanent and transit pitches in the most sustainable locations will support the general principle of land efficiency.</p> <p>However the allocation of Gypsy and Traveller and Travelling Showpeople sites on previously developed land may not be seen as the most sustainable re-use of land in areas with competing pressures for other uses such as affordable housing.</p> <p>It will be important that districts allocated a greater number of pitches under this option than is required to meet their identified need are able to locate additional pitches in a way that makes an efficient use of land. There is little data on the availability of suitable land and so it is impossible to tell at this level whether an authority would be able to accommodate additional pitches making use of</p>	<p>Neutral effect: There is no discernible difference in the effects associated with Option B, as opposed to Option A. There is no evidence to suggest that any of the districts which are allocated a greater number of pitches under this Option would not be able to integrate further pitches in such a way that makes an efficient use of land.</p>	N/A

	land efficiently.		
To conserve and enhance the region's biodiversity = Neutral effects (i.e. effects are the same as identified for Option A)			
<p>Gypsy and Traveller site provision within the districts of Hastings, Rother, Brighton & Hove, Eastbourne, Chichester, Arun, Worthing, Adur, Canterbury, Dover, Shepway, Thanet, Dartford, Gravesham, Medway, Swale, New Forest, Eastleigh, Farnham, Gosport, Havant, Southampton, Portsmouth or the Isle of Wight could cause a significant adverse effect on European sites. (AA Screening Report, p.15, 2007)</p> <p>A significant amount of the region is designated as Area of Outstanding Natural Beauty. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p> <p>The majority of West Berkshire is designated as part of the North Wessex Downs Areas of Outstanding Natural Beauty. (Submitted, SA, Annex B, p.67, 2006)</p> <p>A significant amount of south Wycombe is designated as an Area of Outstanding Natural Beauty. (Submitted, SA Scoping</p>	<p>The effects of the option on this SA Objective will be dependant on location.</p> <p>Potential adverse impacts on biodiversity could result from noise and waste if sites are in close proximity. Biodiversity sites could also come under pressure from grazing for animals kept by the travelling community.</p> <p>Increased pitch provision against Option A figures (of over 10 pitches) in areas containing European sites, AONB and National Parks are proposed in West Berkshire (13), Medway (16) and Shepway (10), This could result in significant negative impacts upon this objective.</p> <p>Reduced provision relative to option A is noted in Dartford (-17), Sevenoaks (-72), Swale (-56), Thanet (-13) and Chichester (-15) could result in improved local biodiversity in this area.</p>	<p>Neutral effect: This option does promote increased pitch provision in authorities with nationally or internationally important biodiversity resources. However, it has been judged that there is no discernible difference in the effects associated with Option B, as opposed to Option A. This is because there is no evidence to suggest that extra pitches cannot be located in areas where potential negative impacts are minimised. The presence or not of internationally important biodiversity sites within an authority is not an adequate indicator of whether that authority can accept additional pitches without biodiversity impacts.</p>	<p>A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.</p>

<p>Report Annex B, p.67, 2006)</p> <p>The south Downs was is a designated national park, which is a sizable border along the eastern border of Adur. (Submitted, SA Scoping Report Annex B, p.67, 2006)</p> <p>Large central sections of Sevenoaks are designated as an Area of Outstanding Natural Beauty as part of the North Downs Way. (Submitted, Scoping Report, Annex B, p.67, 2006)</p>	<p>It is anticipated that any emerging Site Allocations DPD would be accompanied by an AA screening report to ensure that proposed allocations especially in areas such as Medway do not affect the integrity of European Sites.</p> <p>The allocation of sites should be in accordance with PPS9, Thames Basin Heath SPA Draft Interim Strategic Delivery Plan, and other national, regional, and local Biodiversity Action Plans.</p>		
<p>To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment = Neutral effects (i.e. effects are the same as identified for Option A)</p>			
<p>There is little available evidence to inform the assessment against this objective.</p>	<p>Sites for Gypsies, travellers and Showpeople could have significant visual effects and therefore the historic environment would need to be a consideration in implementing the allocations stipulated in Option C.</p>	<p>Neutral effect: This option does promote increased pitch provision in authorities with nationally important historic and landscape resources. However, it has been judged that there is no discernible difference in the effects associated with Option B, as opposed to Option A. This is because there is no evidence to suggest that extra pitches cannot be located in areas where potential negative impacts are minimised. Furthermore, it may be that increasing the number of pitches</p>	<p>N/A</p>

		in a district reduces the potential for unauthorised pitches in close proximity to sensitive sites.	
To reduce waste generation and disposal and achieve the sustainable management of waste = Neutral effects (i.e. effects are the same as identified for Option A)			
Recycling rates are low (below 10%) and of particular issue in Dover, Thanet, Eastbourne, Dartford, Runnymede, Epsom and Ewell and Gosport (SA Report for the Draft SE Plan, Annex B, p.96, 2006)	<p>Allocations alone will not impact on sustainable waste management. However, in implementing this option waste facilities should be a consideration. In order to meet the desire to reduce the amount of waste going to landfill recycling facilities need to be increased, including on Gypsy, Traveller, and Travelling Showpeople sites.</p> <p>Education and awareness on the importance of recycling will also assist in levels of recycling for the settled and Gypsy, Traveller and travelling Showpeople community.</p>	Neutral effect: There is no evidence to suggest that there will be any discernable difference in effects associated with this option, as opposed to Option A.	N/A
To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region = Neutral effects (i.e. effects are the same as identified for Option A)			
There are pockets of employment deprivation in the region, where employment rates are lower than the SE average in the following districts. Dover, Thanet, Shepway, Canterbury, Sevenoaks, Oxford, Slough, Gosport, Havant and Hastings.	<p>Providing a permanent address will provide an opportunity for the Gypsy and Traveller population to overcome one of the barriers to employment.</p> <p>In order to improve the Gypsy, Traveller and Showpeople</p>	Neutral effect: There is no evidence to suggest that there will be any discernable difference in effects associated with this option, as opposed to Option A.	N/A

<p>(SA Report for the Draft SE Plan, Annex B, p.113, 2006).</p> <p>Economic inactivity is a particular issue for the following districts. Dover, Thanet, Shepway, Canterbury, Hastings, Tunbridge Wells, Oxford, Slough, Winchester, Gosport, Elmbridge and Woking. (SA Report for the Draft SE Plan, Annex B, p.116, 2006)</p> <p>The lowest employment levels are recorded in Hastings, Slough, Canterbury, Dover, Thanet, Gosport and Havant. (SA Report for the Draft SE Plan, Annex B, p.116, 2006)</p>	<p>community's contribution to the local economy the root causes need to be addressed (i.e. the community benefit least from education and training compared to the settled community. However, permanent pitches alone cannot break down all of the barriers to enter the traditional economy</p> <p>Dover, Thanet and Shepway are all allocated significantly more sites under this Option than is the case under Option A (although the increase is less than that proposed under Option B). These districts also have significant issues regarding economic deprivation. It is not clear that relative economic deprivation will impact upon Gypsies and Travellers, particularly given that additional pitches will not be located in urban centres, where deprivation is most focused. For this reason also, it is not thought that accommodating the extra numbers of Gypsies and Travellers proposed by this option will further increase deprivation in the wider District, or hinder regeneration.</p>		
<p>SA Second Tier Objectives</p>			

To develop and maintain a skilled workforce to support long-term competitiveness of the region.	0
To encourage the development of a buoyant, sustainable tourism sector (Tourism)	0
To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities (knowledge based economy)	0
To stimulate economic revival in priority regeneration areas (Regeneration areas)	0
To sustain economic growth and competitiveness across the region (Economic growth)	0
To increase energy efficiency, and the proportion of energy generated from renewable sources in the region	0
To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resource management (Water quality)	0
To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products (Reducing consumption)	0
To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry (Road congestion)	0
To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts (Climate change)	0
To reduce air pollution and ensure air quality continues to improve (Air quality)	0

It is not expected that the redistribution of pitch allocations promoted by this option will result in effects against any of the second tier objectives that differ significantly from the effects associated with Option A.

SUMMARY

General Principles

Option C allocates significantly more pitches to Hampshire and the Isle of Wight (146) and Oxfordshire (36) and significantly fewer pitches to Kent (89) Surrey (83) and West Sussex (33). In Hampshire and the Isle of Wight the most significant increases are within Basingstoke and Deane (29), East Hampshire (20), Test Valley (26) and Winchester (22). In Kent there are increases in Ashford, Dover, Medway Shepway, Thanet and Tonbridge and Malling, though these are not as extreme as under Option B. There are large decreases in Sevenoaks (-72) and Swale (56) that are of a greater magnitude than the decreases in these districts promoted under Option B. There are also decreases of a lesser magnitude proposed in Dartford and Maidstone. In Oxfordshire there are increases promoted in Cherwell (17) and Vale of White Horse (15). In Surrey there are decreases in promoted in Guildford (13), Runnymede (20), Tandridge (10) and Waverley (22). In West Sussex there are decreases in Chchester (25) and Crawley (16).

Also, in Berkshire, the departure from the allocations set out in Option A is similar to that set out in Option B (Bracknell, West Berkshire and Wokingham receive more pitches, whilst Slough and Windsor and Maidenhead receive fewer pitches). In Buckinghamshire Aylesbury Vale receives more pitches under Option B as opposed to Option A (+15), whilst South Bucks receives fewer (-14).

The appraisal has found that, for the majority of SA Objectives, the effects associated with this Option will not be significantly different to

Option A. This is because the evidence of constraints (for example related to flood risk, biodiversity, landscape, waste, employment and access to services and facilities) at the local authority scale is insufficient to conclude that additional pitches could not be delivered in a sustainable fashion.

In terms of some other Sustainability Objectives - notably health, poverty and education – there is some potential for existing issues to act as a significant constraint to the ability of new pitches to be brought forward in a sustainable fashion within an area. Furthermore, increased pitch provision or an increased likelihood of unauthorised pitches could exacerbate existing issues in some areas. However, it is felt that planning criteria at the local level will be able to ensure that there are no significant effects in terms of these objectives. For example, even within an authority that suffers from relatively high levels of deprivation, it will be possible to ensure that pitches are located in areas where the ability of Gypsies and Traveller communities to thrive is not hindered, and existing baseline conditions are not compounded or exacerbated by the presence of Gypsy and Traveller pitches.

The appraisal against three of the Objectives highlighted that there may be negative sustainability implications associated with promoting an allocation of pitches that departs from the allocation identified as necessary to meet identified needs.

Firstly, and most importantly, this Option has the potential to result in Gypsies and Travellers not having the opportunity receive a pitch in an area where they want to live, i.e. where there is an identified need. Effects are somewhat uncertain as in many instances delivery of a level of pitches below identified needs in one authority will effectively be compensated by delivery of a level of pitches greater than identified need in another neighbouring authority. However, in some instances it is likely that Gypsies and Travellers will not consider the offer of a pitch in a nearby authority to that which they would preferably want to live, as meeting their housing needs. Related to this, there is also the potential for this option to prevent the development of vibrant Gypsy and Traveller communities.

Secondly, it was considered that baseline crime statistics at the local authority scale should be a consideration when promoting changes to the strategic allocation of pitches that depart from the level required to meet identified needs. The reason for this is that baseline crime statistics are considered to be a robust indicator of fear of crime at the local authority scale. Although there is little evidence to suggest that increasing the numbers of Gypsies and Travellers in an authority will impact upon the crime baseline, there is the potential for baseline conditions in terms of fear of crime to be worsened. Also, effects on the fear of crime baseline conditions might be felt in a relatively large area surrounding new Gypsy and Traveller pitches, as opposed to being highly localised (as is the case for many other effects on existing constraints). Furthermore, it is considered that fear of crime will be related only to the number and size of Gypsy and Traveller sites, rather than whether sites are authorised or unauthorised. However, fear of crime associated with authorised Gypsy and Pitches might have the potential to reduce over time as it will be more likely that there will be positive integration and growth of respect and understanding between the settled and Gypsy and Traveller communities. Nonetheless, it is questionable whether provision should be altered for authorities with existing high levels of crime.

Recommendations for the distribution of pitches

- Ensure that should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their housing needs are met.

- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of health deprivation. No worsening of health deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of deprivation. No worsening of deprivation will be acceptable.
- It will be important to monitor the effects of Gypsy and Traveller sites on existing levels of educational deprivation. No worsening of educational deprivation will be acceptable.
- Reconsider the promotion of a level of pitches other than that required to meet identified need in districts where fear of crime is likely to be at high existing levels (crime statistics can be taken to be a reasonable proxy of fear of crime).
- Negative effects on Gypsy and Traveller communities might be mitigated to a degree by ensuring that, should any authority be allocated a level of pitch provision below the level required to meet identified needs, that this shortfall is compensated by additional pitch provision within a geographical area that will suit Gypsies and Travellers and ensure that their needs as a community are met.
- A more in depth Habitats Regulations Assessment may be important in order to ensure that there are no impacts on biodiversity sites of European importance.

Appendix 2 – Details of Gypsy and traveller pitch provision 2006-2016 ⁹

(Virtual) County and Authority	Option A	Option B	Option C
Berkshire	78	78	90
Buckinghamshire MK	165	165	168
East Sussex	60	60	77
Hampshire IoW ***	100	100	246
Kent	385	387	296
Oxfordshire	98	98	134
Surrey	260	261	177
West Sussex	201	201	168
South East	1347*	1350*	1355*
Bracknell Forest	6	17	16
Reading	7	6	11
Slough	17	6	9
West Berkshire	9	18	22
Windsor & M'head	25	9	10
Wokingham	14	22	23
Berkshire	78	78	90
Aylesbury Vale	63	63	78
Chiltern	17	17	12
Milton Keynes	37	37	43
South Bucks	33	33	19
Wycombe	15	15	14
Buck'shire MK	165	165	168
Brighton & Hove	16	14	20
Eastbourne	1	1	4
Hastings	3	1	5
Lewes	12	12	14
Rother	5	9	8

⁹ These figures are not yet fixed.

Wealden	23	23	25
East Sussex	60	60	77
Ba'stoke & Deane	3	3	32
East Hampshire	0	0	20
Eastleigh	2	2	9
Fareham	2	2	9
Gosport	0	0	4
Hart	12	12	19
Havant	2	2	6
Isle of Wight ***	27	27	27
New Forest	5	5	9
Portsmouth City	8	8	12
Rushmoor	0	0	6
Southampton City	10	10	16
Test Valley	12	12	38
Winchester	17	17	39
Hampshire IoW	100	100	246
Ashford	22	42	37
Canterbury	32	39	32
Dartford	38	32	21
Dover	6	30	26
Gravesham	19	13	10
Maidstone	51	44	38
Medway	14	40	30
Sevenoaks	89	25	17
Shepway	2	16	12
Swale	80	37	24
Thanet	5	21	18
T'bridge & Malling	15	31	20
Tunbridge Wells	12	17	13
Kent	385	387	296
Cherwell	20	20	37
Oxford City	6	6	9
South Oxfordshire	38	38	31
Vale' White Horse	8	8	23

West Oxfordshire	26	26	34
Oxfordshire	98	98	134
Elmbridge	18	21	17
Epsom & Ewell	14	14	10
Guildford	40	43	27
Mole Valley	14	14	10
Reigate & Banstead	8	11	14
Runnymede	35	30	15
Spelthorne	13	15	13
Surrey Heath	25	25	17
Tandridge	21	19	11
Waverley	51	48	29
Woking	21	21	14
Surrey	260	261	177
Adur	9	18	12
Arun	14	18	17
Chichester	65	65	40
Crawley	33	23	17
Horsham	59	56	53
Mid Sussex	21	21	23
Worthing	0	0	5
West Sussex	201	201	168

* Rounding introduces minor summation discrepancies.

** Travelling Showmen and Transit provision recorded in Annexes E and F

*** Isle of Wight held constant as this is a specific requirement for New Age Travellers not linked to need in mainland Hampshire.