



SCOTT WILSON PLANNING, ENVIRONMENT AND DESIGN ADDENDUM TO THE SCOPING REPORT

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Scott Wilson Planning, Environment and Design

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1 INTRODUCTION

1.1 South Cambridgeshire Local Development Framework

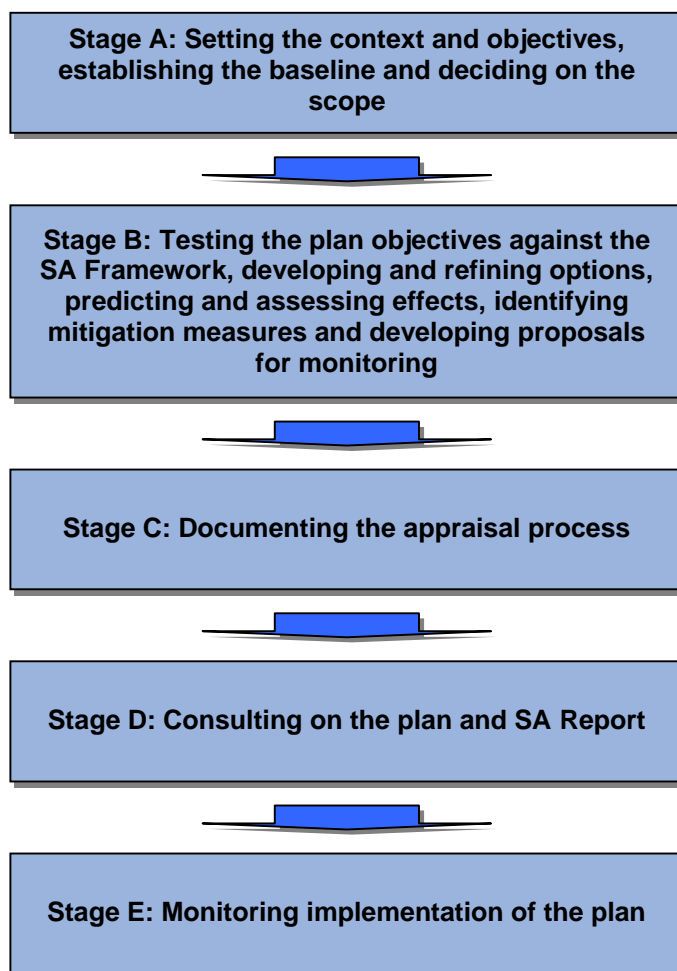
- 1.1.1 South Cambridgeshire District Council ('the Council') has recently begun to prepare the issues and options stage of the development of the Gypsy and Traveller Development Plan Document (DPD). The DPD will form part of the South Cambridgeshire Local Development Framework (LDF), the statutory development plan, and will be used in the determination of planning applications.
- 1.1.2 The Gypsy and Traveller DPD will be a statutory plan that will provide specific planning policy and guidance. This will provide a framework for the planning of Gypsy and Traveller accommodation and the selection of appropriate sites and will act as a supporting document to the Council's emerging Core Strategy, Development Control Policies and Area Action Plans (AAP) included in the Council's Local Development Scheme (LDS).

1.2 Sustainability Appraisal

- 1.2.1 Under the Planning and Compulsory Purchase Act 2004, local planning authorities must undertake a **Sustainability Appraisal** (SA) for each of the Local Development Documents (LDDs) included in an LDF. LDDs include DPDs and Supplementary Planning Guidance (SPDs). SA involves assessing the degree to which an LDD reflects and promotes the principles of sustainable development and, where appropriate, makes recommendations for strengthening its sustainability performance. The SA process incorporates the requirements of the EU 'Strategic Environmental Assessment Directive' which requires certain UK plans and programmes – including LDDs – to undergo a formal environmental assessment.
- 1.2.2 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 impacts and can recommend measure to further enhance benefits. The findings of SA should be reflected in the adopted DPD to help ensure that it maximises its contribution to future sustainability.
- 1.2.3 Government guidance¹ on undertaking SA for LDDs advocates a five-stage process. This process is illustrated in Figure 1. Each stage of the process is divided into subsections reflecting the components of the process that require undertaking and reporting.

¹ ODPM (2005). *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

Figure 1. Five stage approach to SA



- 1.2.4 Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the LDD in question can be assessed – together with the evidence base that will help to inform the appraisal. The evidence base should paint a picture of the area in question which can be used in evaluating the impacts of the LDD on the sustainable development objectives. The framework and evidence base should be documented in a Scoping Report, which should be subject to consultation with the four SEA Consultation Bodies² and other stakeholders including organisations with an economic and social remit.
- 1.2.5 South Cambridgeshire District Council has undertaken Stage A of the process in-house producing an updated Scoping Report³ in January 2006. The Scoping Report is available on the Council’s website⁴.

² Countryside Agency, English Heritage, English Nature, Environment Agency

³ South Cambridgeshire District Council (January, 2006), Local Development Framework: Sustainability Appraisal: Scoping Report

⁴ http://www.scambs.gov.uk/admin/documents/retrieve.asp?pk_document=3616

- 1.2.6 Stage B in the SA process involves undertaking the appraisal itself. SA centres on the consideration of different options. Options are the choices open to plan-makers for delivering the plan objectives and resolving key issues. Later sections of Stage B of the process will focus on the assessment of preferred options including policies and site locations. However, initially the Sustainability Assessment of options will culminate in the production of an '**Interim SA Report**'. This documents the appraisal of the options proposed by the Council and summarises their potential economic, social and environmental implications. The appraisal of the preferred options will be documented in a '**Final SA Report**' which will be published at a later date alongside the preferred options for further public consultation.
- 1.2.7 Scott Wilson has been commissioned to undertake the Sustainability Appraisal (SA) of the Gypsy and Traveller DPD to accompany the issues and options consultation that the Council will undertake.

1.3 This Report

- 1.3.1 The Council's Scoping Report⁵ contains a broad range of baseline information relevant to the production of LDF documents. The Scoping Report provides a broad range of indicators, used as significant effects indicators within the Council's Annual Monitoring Report (AMR). These have been used to illustrate the Council's current performance against the sustainability objectives used in assessing the LDF documents.
- 1.3.2 Government guidance on Sustainability Appraisal⁶ states that one scoping report can be produced for several LDDs, provided that it gives sufficient information for each of the LDDs concerned. This can be achieved by preparing the Scoping Report in two parts, the second of which is more specific reporting on individual LDDs.
- 1.3.3 This report acts as an addendum to the Scoping Report and reflects a second stage of scoping. The report contains additional scoping information relevant to the Gypsy and Traveller DPD that will form the basis of the assessment of the Interim SA Report.

⁵ South Cambridgeshire District Council (January, 2006), Local Development Framework: Sustainability Appraisal: Scoping Report (http://www.scambs.gov.uk/admin/documents/retrieve.asp?pk_document=3616)

⁶ ODPM (2005). *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

1.4 Consultation

- 1.4.1 The SEA Directive states that the environmental authorities⁷ should consult upon the scope of the information that is to be included in the environmental report.

“The [Environmental] authorities [designated for the purposes of the SEA Directive in each EU Member State]...shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report”

(Article 5(4))

- 1.4.2 South Cambridgeshire District Council undertook consultation on this report for five weeks from the 4th September 2006. Government guidance on Sustainability Appraisal⁸ states that it is also desirable for other bodies to be consulted as appropriate to the Local Development Document (LDD) in question.

- 1.4.3 In this case consultation was undertaken on the draft addendum with the following organisations:

- English Nature;
- Environment Agency;
- English Heritage;
- Countryside Agency;
- Friends, Families and Travellers;
- The Gypsy and Traveller Law Reform Coalition
- National Travellers Action Group
- Advisory Council for the Education of Romany and other Travellers (ACERT)
- National Association of Health Workers with Travellers
- National Association of Teachers of Travellers
- The Gypsy Council for Health, Education and Welfare
- Irish Travellers Movement in Britain
- The Gypsy Council
- Commission for Racial Equality
- Ormison Children and Families Trust (Cambridgeshire Travellers Initiative)

- 1.4.4 In light of the response received several amendments were made to the addendum and the final version is presented here. Appendix D documents the responses received and the changes made in response to these.

⁷ Environment Agency, English Nature, English Heritage, The Countryside Agency.

⁸ ODPM (2005). *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

2 STAGE A

2.1 Task A1 – Identifying other relevant plans, programmes and sustainability objectives

2.1.1 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”

(Annex 1(a))

2.1.2 Many Policies, Plans, Programmes, Strategies and Initiatives (PPPSI) also set out objectives for environmental protection and for wider sustainability. Under the SEA Directive, reference must be made to environmental objectives. The context review satisfies this requirement.

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

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme...”

(Annex 1 (e))

2.1.3 An initial review of PPPSI was carried out as part of the LDF Scoping Report. This section provides the results of a further review of PPPSIs relevant to the Gypsy and Traveller DPD. The PPPSIs were reviewed to identify issues relating to Gypsies and travellers and possible implications for the development of the DPD and for the Sustainability Appraisal. Details of the review are included in Appendix A.

2.1.4 Table 1 below lists the relevant PPPSIs reviewed for the purposes of this SA in addition to those PPPSI’s included within the Scoping Report. The Table includes the key messages from the review that should be taken into account in developing the Gypsy and Traveller DPD and its accompanying SA.

Table 1. List of relevant policies, plans, programmes, strategies and initiatives reviewed and key messages.

National	Key messages for the DPD:
Housing Act 2004	<ul style="list-style-type: none"> The DPD should reflect the conclusions of a needs assessment
Planning and Compulsory Purchase Act 2004	<ul style="list-style-type: none"> Spatial provisions for Gypsy and Traveller housing needs must be included in the DPD
The Race Relations Act 1976, and Race Relations (Amendment) Act 2000	<ul style="list-style-type: none"> Must reflect equal and fair accessibilities afforded to other social and ethnic groups in the district

The Human Rights Act 1998	<ul style="list-style-type: none"> The DPD will need to reflect the rights to travel and occupy caravans as an integral part of social identity and respect needs for long term settlements
Town and Country Planning Act 1990 (TCPA 1990) and Planning and Compensation Act 1991	<ul style="list-style-type: none"> Powers to enforce planning issues on Gypsy and Traveller sites, therefore the plan should define the range and form of permissible development
ODPM Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites	<ul style="list-style-type: none"> To increase the number of Gypsy and Traveller sites in appropriate locations and reduce the number of unauthorised encampments. To identify and make provision for resultant land and accommodation requirements Support and create inclusive communities, the DPD must be fair, realistic and inclusive in its policies Avoid Gypsy and Traveller evictions and increasing homelessness Provide long term and transit sites that meet economic and social needs Consider need for the ability to travel as a key feature of accommodation need Consider underused land as possible locations New sites should respect and not dominate the nearest settled community Sites may need to provide for mixed uses Vehicular access and parking are key considerations
ODPM - Sustainable Communities: Homes for all 2005	<ul style="list-style-type: none"> The DPD must promote sustainable and mixed communities
Regional Key messages for the DPD:	
Regional Housing Strategy 2005-2010	<ul style="list-style-type: none"> Create inclusive communities and widen choice for type and permanence of housing required
Sub - Regional Key messages for the DPD:	
Cambridge Sub-regional Traveller Needs Assessment May 2006	<ul style="list-style-type: none"> Ensure a mix of sites that satisfy both need to travel and long term residence Preference for small self owned family group sites for long stay sites, close to established communities 110-130 pitches are required in the district Access to health and educational establishments are important Sites must support and sustain economic activity within the population Sites should include adequate on site facilities The population suffer from disadvantage and racism from neighbours, where possible the DPD must promote measures to increase social inclusion.
District Key messages for the DPD:	
South Cambridgeshire Local Plan 2004	<ul style="list-style-type: none"> Previous planning policy has considered proximity to services, impacts on adjoining residents, impacts on heritage and landscape, impacts on use of public rights of way, vehicular access and local infrastructure to be key considerations in the granting of planning permission. The DPD will need to consider if these requirements are still valid.

Task A2 – Collecting Baseline data

- 2.1.5 Annex I to the SEA Directive states that the Environmental Report (in this case the 'Sustainability Report') should include:

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”

“the environmental characteristics of areas likely to be significantly affected”

(Annex 1(b) and (c))

- 2.1.6 The Guidance on Sustainability Appraisal of Local Development Frameworks includes guidance on establishing the context:
- 2.1.7 *“Baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. Baseline information consists of mainly indicators although both quantitative and qualitative information can be used. To get the best value from baseline information, it needs to be kept up to date rather than being merely a snapshot of the situation at a particular time.”*⁹
- 2.1.8 The Scoping Report adopted covers all LDF documents, and as such it covers the baseline at 'fit for purpose' levels i.e. the baseline information as presented as a broad series of key indicators providing a range of general information on which to base assessments. This information though sufficient for LDD's with a wide scope, should be supplemented by more specific information when used to assess documents more specific in focus, such as the Gypsy and Traveller DPD.
- 2.1.9 Specific data relating to the Gypsy and Traveller community is difficult to determine and new specific indicators have not been identifiable. This is predominantly due to difficulties in collecting accurate data for a transient population. However, some data is available. The Cambridge Sub-Region Traveller Needs Assessment published in May 2006 has been used as a source of specific information which has been used to augment the existing baseline.
- 2.1.10 Additional baseline information is presented in a text format in the subsequent sections of this report. The additional information has been grouped into relevant highlighted topics and where applicable tabulated baseline data held in Appendix B is referenced.
- 2.1.11 **Population** (Table I Appendix B) - The size of the Gypsy and Traveller population in 2005 has been estimated as 1344, consisting of 278 households, and 425 caravans, within the South Cambridgeshire district and 6915 in total within the Cambridge sub-region. Therefore approximately 19% of the Gypsy and Traveller

⁹ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

population within the region live within South Cambridgeshire District, indicating its importance to this population. The population is estimated to increase by 44 households by 2010. This figure has been used to calculate that 110 to 130 new pitches will be required during the period 2005-2010 to satisfy increasing demand. This demand includes existing need and demand arising from overcrowding, transfer from housing and family formation. The needs assessment identifies 55-65 households in unauthorised caravans requiring new sites.

2.1.12 Presently identified need for pitches in the district is only available through the regional needs assessment, which predicts need during the period 2005-2010. The DPD therefore can only allocate sites to fulfil need during this period. The GTDPD will then be reviewed to take account of the Regional Spatial Strategy (RSS) review, which will identify the number of pitches required in the district to 2021.

2.1.13 **Land Use and Ownership** – Ownership of existing sites is considered to be a key influence on the sustainability of provision for Gypsy and Travellers. South Cambridgeshire has a high ratio of private authorised to Council accommodation. This reflects Council site closures and the grant of permission to several large privately owned sites. It is estimated¹⁰ that there are 280-350 caravans on private authorised sites, with an additional average of 87 on unauthorised sites (Table II Appendix B). The Cambridge Sub-regional Traveller Needs Assessment May 2006 indicates that the numbers of unauthorised caravans have grown in recent years due to the following reasons:

- Most are on gypsy owned land without planning permission, usually near gypsy owned land that already has planning permission. Several had lost authorised accommodation.
- A few were on highway verges having lost council accommodation.
- A few were gypsies/travellers passing through on short-stay.

2.1.14 **Health and Education** – Numerical information on health and education levels within the Gypsy and Traveller population is sparse at both national and regional level. This is due to the transient nature of this group, which results in difficulties with GP registrations¹¹ and the number of children within the education system. Therefore data collection is difficult. However, Gypsies experience the worst health and education status of any disadvantaged group in England¹² and difficulties over accommodation play a major role in this situation¹³. The sub regional needs assessment indicates that among those surveyed there is a high incidence of serious health problems and disabilities. National research has also indicated that mental health issues are a problem amongst Gypsies and Travellers.

¹⁰ Cambridge Sub-regional Traveller Needs Assessment May 2006

¹¹ Parry, G. et al, (2004), The Health Status of Gypsies & Travellers in England: Report of Department of Health Inequalities in Health Research Initiative Project 121/7500, The University of Sheffield
(Available at: <http://www.shef.ac.uk/content/1/c6/02/55/71/GT%20final%20report%20for%20web.pdf>)

¹² ODPM, (2006), Circular 01/2006 Planning For Gypsy And Traveller Sites, ODPM

¹³ Consultation response from Friends, Families, Travellers, 11 September 2006

2.2 Task A3 - Main social, environmental and economic issues and problems identified

2.2.1 The identification of sustainability issues additional to those contained in the Scoping Report, arise from the review of relevant policy, plans, programmes, strategies and initiatives and the further baseline context review. The issues highlighted within this section are of particular relevance to the Gypsy and Traveller DPD and will help inform the sustainability assessments undertaken during Stage B of the SA process.

2.2.2 The requirement to identify sustainability problems arises from 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))

2.2.3 In light of the SA requirement, economic and social as well as environmental problems should be identified.

2.2.4 *"The identification of sustainability issues (including environmental problems as required by the SEA Directive) is an opportunity to define key issues for the DPD and develop sustainable plan alternatives and options"*¹⁴

2.2.5 The guidance emphasises that any problems identified should, where possible, be supported by evidence in the form of baseline information.

2.2.6 South Cambridgeshire District Council identified key sustainability issues that are likely to be considerations in the formation of policy direction for LDF documents. These are included in the LDF SA Scoping Report. Table 2 below provides a summary of additional sustainability issues that have been highlighted through the review process for this report.

¹⁴ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

Table2 Summaries of South Cambridgeshire District Council Gypsy and Traveller DPD additional Sustainability Issues

Sustainability problem	Supporting evidence and issues for consideration
Social	
<p>Location based needs:</p> <p>Access to services (local shops, doctors and health centres, schools, employment)</p>	<ul style="list-style-type: none"> • Consider locations in or near existing settlements with access to local shops, doctors and schools (First Priority for consideration, ODPM, 2006) • Consider access to sites. No disabled access reported for some council sites (Regional Needs Assessment 2006) • Wider benefits of easier access to GP and other health services (Issues of Sustainability, ODPM, 2006) • Children attending school on a regular basis (Issues of Sustainability, ODPM, 2006) • Need to provide sites, including transit sites, in locations that meet the current working patterns of gypsies and travellers (18, ODPM, 2006) • Consideration must be given to vehicular access from the public highway, provision for parking, turning and servicing on site, and road safety for occupants and visitors (Best Practice, ODPM, 2006) • High incidence of educational disadvantage (Regional Needs Assessment 2006) • High incidence of serious health problems (Regional Needs Assessment 2006)
<p>Health inequality and wider determinants</p>	<ul style="list-style-type: none"> • Gypsies are believed to experience the worst health and education status of any disadvantaged group in England (ODPM, 2006) • Health outcomes and status significantly poorer than that found in the lowest socio-economic group in the UK population (Parry et al, 2004) • Accommodation is overriding factor as the context for bad health effects, this is due to: <ul style="list-style-type: none"> - Increased evictions - Restricted access to healthcare and education - Increase in unsafe conditions on roadside sites - Breakdown of social and community support networks - Road side sites with limited access to clean water (Regional Needs Assessment 2006) • Wider health determinants include: <ul style="list-style-type: none"> - High levels of racism from neighbours - Feelings of isolation and loss of identity (Regional Needs Assessment 2006) • Access to services (ODPM, 2006) • Breakdown of support networks (Regional Needs Assessment 2006)

<p>Ability of family groups to be located together or in close proximity</p>	<ul style="list-style-type: none"> • Family networks and informal reciprocal arrangements are important for encouraging and sustaining economic activity (Regional Needs Assessment 2006) • 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 (19, ODPM 2006) • Council sites have been criticised for lack of expansion space which undermines the structure of extended families (3.3.5 Regional Needs Assessment 2006) • When household sizes reach around six individuals they seem to displace to unauthorised sites, perhaps because of the difficulty in accessing a large enough pitch on an authorised site (3.5.5 Regional Needs Assessment 2006)
<p>Effect on and integration with settled communities</p>	<ul style="list-style-type: none"> • Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing undue pressure on the local infrastructure (54, ODPM, 2006) • Promotion of peaceful and integrated co-existence between the site and the local community (Issue of Sustainability, ODPM, 2006) • Consider potential for noise and other disturbance from movement of vehicles on the site and on site business activities (Priority for consideration, ODPM, 2006)
<p>Range of sites available, and levels of permanence must meet needs of Gypsy/Traveller population</p>	<ul style="list-style-type: none"> • There is an identified immediate need for housing with 55-65 unauthorised caravans households with a current need (Regional Needs Assessment 2006). • Need for more sites of all kinds: public, private, long-stay and transit (Regional Needs Assessment 2006) • Gypsy/Traveller preference for small self-owned long stay sites for family groups, on edge of a village and near established Gypsy/Traveller communities (Regional Needs Assessment 2006) • Even if every Gypsy/Traveller family in the country had their own long-stay or 'settled' base, there would still be a need for transit sites for those who are travelling (3.3.8, Regional Needs Assessment 2006) • Transit and residential sites should not be placed at the same location (3.3.10, Regional Needs Assessment 2006) • Number of unauthorised caravans in district has grown by over 100 in recent years, SCDC recorded 183 unauthorised caravans in July 2005, second highest count in the country (Regional Needs Assessment 2006) • The granting of temporary permissions for existing unauthorised sites could be explored as a means of meeting existing required provision (Response from Friends, Family, Travellers, 11 September 2006). • The creation of quality living environments will help reduce inequalities (Response from Friends, Family, Travellers, 11 September 2006).

Economic	
Type of work available to Gypsies and Travellers changing (and higher risk of economic deprivation)	<ul style="list-style-type: none"> Types of work have changed over recent years contributing to severe economic disadvantage and social exclusion (Regional Needs Assessment 2006) The South Cambridgeshire district has a high ratio of private authorised to council accommodation. This does not address the needs of those Gypsies/Travellers who lack resources to buy their own land (Regional Needs Assessment 2006)
Environmental	
Consideration of Nature and Heritage Designations	<ul style="list-style-type: none"> 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 (Criteria which are unacceptable, ODPM, 2006) 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). Recommendation: map designations (e.g. Special Areas of Conservation, Sites of Special Scientific Interest, Local Nature Reserves, Heritage designations such as scheduled ancient monuments, archaeological priority zones) and use in the assessment of site allocations (Response from English Nature, dated 14 September 2006).
General Environmental Impacts	<ul style="list-style-type: none"> Provision of a settled base that reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment (Issues of Sustainability, ODPM, 2006) Use of brownfield, untidy or derelict land can be encouraged as this may help to enhance the environment and increase openness (ODPM, 2006) Sites should be connected to the public foul sewer for appropriate disposal of foul drainage. In the eventuality of a connection to the public sewer not being available, the suitability of non-mains sewerage must be effectively demonstrated. (Response from Environment Agency, 20 September 2006). The appropriate collection of waste must be considered on sites, and appropriate access to recycling facilities. (Response from Environment Agency, 20 September 2006).

<p>Environmental considerations for location of sites</p>	<ul style="list-style-type: none"> • Not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans (Issues of Sustainability, ODPM, 2006) • Should not be located on significantly contaminated land (National Best Practice, ODPM, 2006) <ul style="list-style-type: none"> - Note that there is no discussion of possibilities to remediate contaminated land in ODPM guidance, consider significance issues and appropriate safety levels for caravan sites and outdoor play areas. • Issues on council sites include: <ul style="list-style-type: none"> - Poor drainage - Fire risk (Regional Needs Assessment 2006) • Noise and visual impacts (overlooking) should be considered both on areas adjoining Gypsy and traveller sites and also impact on Gypsy and Traveller sites. (Response from Friends, Family, Travellers, 11 September 2006).
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2.2.7 The review of the issues supplementing the scope of the SA has identified some key synergies that should be highlighted and discussed, these will have a bearing on the future assessments used to help develop the DPD.

2.2.8 The ability of family groups to stay together has a number of linkages. Some available pitches should be of sufficient size to ensure that family units can remain together. It is indicated that once family size exceeds 6 there is a trend towards use of unauthorised sites, classed as homelessness. Family groups are also important to encouraging and sustaining economic activity; this is particularly significant when set against a background of changing work patterns that have been identified as contributing to severe economic disadvantage. The ability of Gypsies and Travellers to generate economic revenue is particularly important as this affects their ability to buy land and establish private sites, the preferred choice. The result is to place pressure on Council owned sites, which have a lack of pitches and desired facilities, again potentially affecting the number of unauthorised sites.

2.2.9 The benefits of promoting greater stability for family groups of Gypsies and Travellers in their preferred location extend also to social needs. Stability will increase the desired proximity to and continuity of health and education services. Encouraging family groups also helps decrease isolation and helps combat prejudice. These factors are linked to the mental health welfare of this group.

2.3 Task A4 - Sustainability Appraisal Framework

2.3.1 The 22 SA objectives set out in the Scoping Report are shown in full in Appendix C. The objectives are grouped into the following topic areas.

- Land and water resources
- Biodiversity
- Landscape, townscape and archaeology
- Climate change and pollution
- Healthy communities
- Inclusive communities
- Economic activity

2.3.2 These objectives have undergone previous consultation and it is not proposed to change or add any further objectives. A number of the objectives will be broadly relevant to implementation of the plan. For example, objectives with an environmental focus will be relevant to gauge the impact of proposed sites on the receiving environment. However, there are objectives that are likely to indicate impact on the key synergies identified in paragraphs 2.3.8 and 2.3.9. These are included in the table below.

Table3 Key Sustainability Objectives

SA Topic	SA objectives	Decision Making Criteria
Healthy Communities	5.1 Maintain and enhance human health	<ul style="list-style-type: none"> • Will it substantially reduce mortality rates?
Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities, including health, education and leisure (shops, post offices, pubs etc)?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society, including the elderly and disabled?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it meet the needs of the travelling community?
Economic Activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	<ul style="list-style-type: none"> • Will it improve the range of employment opportunities to provide a satisfying job or occupation for everyone who wants one? • Will it encourage the rural economy and diversification?

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- 2.3.3 It is considered that objectives, and in particular those listed under inclusive communities will adequately cover the scope of the Gypsy and Traveller DPD.

2.4 Task A5 – Consulting on the Scope of the Sustainability Appraisal.

- 2.4.1 This report acts as an addendum to the LDF Scoping Report, and as such contains additional information to that previously consulted upon. This information will form a substantial amount of the detail which the sustainability assessments will be based upon and reported in the Interim and Final SA Reports.
- 2.4.2 *“To meet the requirements of the SEA Directive, the LPA must seek the views of the four statutory environmental consultation bodies designated in the SEA Regulations on the Scope and level of detail of the environmental information to be include in the SA Report.”¹⁵*
- 2.4.3 The four Statutory Consultees¹⁶ and the other groups listed in paragraph 1.4.3 have been consulted on this report. Alterations to this report have been made in light of the responses. These comments and alterations are listed in Appendix D.

¹⁵ ODPM (2005). *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents* (available at: <http://www.odpm.gov.uk/index.asp?id=1143289>)

¹⁶ English Heritage, English Nature, Environment Agency, Countryside Agency

3 NEXT STEPS

3.1 Issues and Options Assessment

- 3.1.1 South Cambridgeshire District Council is preparing the Issues and Options stage of consultation for the Gypsy and Traveller DPD. This will be a two-stage process, the first of which will include options for the approach the DPD should take. This will be followed by a second stage of alternative site options.
- 3.1.2 The Stage 1 Issues and Options Sustainability Appraisal will follow this report. The Interim SA report that will accompany this will include elements of Stage B of the SA process, involving the assessment of the various options against the SA objectives. This assessment will be informed by evidence obtained from the context review, the collection of baseline information and the identification of sustainability problems contained within the LDF Scoping Report and this addendum. The Interim SA Report will assess potential effects on the sustainability objectives and propose mitigation where required.

APPENDICES

APPENDIX A – PPPSI REVIEW

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
National				
Housing Act 2004	Under new measures in the Act, local authorities are required to include Gypsies and Travellers in the Local Housing Needs Assessment process and to have a strategy in place explaining how any identified need will be met through wider housing strategies.	The plan must be based on a robust needs assessment for Gypsies and Travellers. The options considered must reflect these needs and requirements.	The SA must consider whether the needs identified can be adequately reached and how these needs fit with the sustainability objectives	Inclusive Communities, Healthy Communities
The Planning and Compulsory Purchase Act 2004	The Planning and Compulsory Purchase Act 2004 requires that local authorities, in preparing their local development plan documents, must have regard to all national policies and guidance. Therefore, because of the contents of the Housing Act, this requires that local authorities make spatial provision for accommodating Gypsies and Travellers.	Spatial provisions for Gypsies and Travellers must be included in the plan and these should reflect need and demand.	Spatial provisions within the SA may have a number of effects on wider sustainability topics and the SA must adequately consider these in formulating guidance on appropriate locations.	All, Inclusive Communities in particular.
The Race Relations Act 1976, and Race Relations (Amendment) Act 2000	This Act places a duty of public (including local) authorities to eliminate unlawful discrimination and promote equal opportunities and good race relations. Local authorities are to assess any	The document must ensure that whilst being based on the specific needs of Gypsy and Travellers that opportunities and considerations given to other ethnic groups are also open to	The SA should be used to identify and evaluate whether the DPD provides equal and fair access to opportunities afforded to other social and ethnic groups within the district.	Inclusive Communities

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	potential impacts on ethnic minorities – in 1989 Gypsies were recognised as an ethnic minority and in 2000 Irish Travellers were also.	these groups.		
The Human Rights Act 1998	This Act came into effect in 2000 when provisions of the European Convention on Human Rights were incorporated into UK law. Several articles are relevant to Gypsies and Travellers. Themes include the following: every person is entitled to the peaceful enjoyment of their possessions and shall not be deprived of these (Article 1); and everyone has the right to respect for their private life, family and home (Article 8). 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 increasingly settle for long periods in one place”.	The DPD must ensure that it provides adequate provision for caravans, and for those that wish to settle for long periods in one location. The DPD must also that locations do not jeopardise the rights of gypsies and travellers regarding their homes and families.	The SA must consider not only whether provisions for caravans for a range of permanence is included within the DPD but also whether locations will affect their rights as defined by this act.	Inclusive Communities, Healthy Communities
Town and Country Planning Act 1990	Planning legislation is the main tool used to tackle unauthorised	The DPD should define the range and form of development	The policies suggested should also have minimal impacts on	All

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
(TCPA 1990) and Planning and Compensation Act 1991	development on land owed by Gypsies and Travellers. Under the TCPA 1990, local planning authorities have a number of powers that include the issuing of enforcement notices to remedy a specified breach of rules.	that may be permitted on Gypsy and Traveller sites and provide guidance and policy on how this can be achieved.	the sustainability objectives	
ODPM Circular 01/2006 Planning for Gypsy and Traveller Caravan Sites	<p>In summary:</p> <ul style="list-style-type: none"> To create and support sustainable, respectful, and inclusive communities where gypsies and travellers have fair access to suitable accommodation, education, health and welfare provision; where there is mutual respect and consideration between all communities for the rights and responsibilities of each community and individual; and where there is respect between individuals and communities towards the environments in which they live and work; To reduce the number of unauthorised encampments and developments and the conflict and controversy they cause and to make enforcement more effective 	<p>The circular provides detail on what development plans should contain. The following issues will be of particular concern to the DPD (paragraph numbers in brackets)</p> <p>(18) Need to provide sites, including transit sites, in locations that meet the current working patterns of gypsies and travellers. These are changing with the community becoming more settled.</p> <p>(19) The ability to travel remains an important part of gypsy and traveller culture. Some communities 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</p>	<p>The RSS is only in draft format and as such has not yet set the total number of pitches that South Cambridgeshire are required to provide. Therefore to provide enough pitches to achieve sustainability it is considered necessary that demand indicated in the sub regional needs assessment should be provided in the DPD. This is also the total that the SA will consider to be required.</p> <p>The SA must assess the ability of the plan to provide for a range of needs in terms of length of stay (including long term), for extended family groups, and for the want to work and live on the same site or in close proximity. Sites for mixed uses should be given preference.</p>	Land and Water Resources, Biodiversity, Landscape and Townscape, Healthy Communities, Inclusive Communities, Economic Activity

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	<p>where local authorities have complied with the guidance in this Circular;</p> <ul style="list-style-type: none"> To increase significantly the number of gypsy and traveller sites in appropriate locations with planning permission in order to address under-provision over the next 3-5 years. To recognise, protect and facilitate the traditional travelling way of life, of Gypsies and Travellers, whilst respecting the interests of the settled community To underline the importance of assessing needs at regional and sub-regional level and for local authorities to develop strategies to ensure that needs are dealt with fairly and effectively To identify and make provision for the resultant land and accommodation requirements To ensure that DPDs include fair, realistic and inclusive policies and to ensure identified need is dealt with fairly and effectively 	<p>their accommodation needs’.</p> <p>(33) Local authorities must allocate sufficient sites for gypsies and travellers, in terms of number of pitches required by the RSS, in site allocation DPDs.</p> <p>(35) A number of ways exist in which local authorities can identify specific sites and make land available:</p> <ul style="list-style-type: none"> Local authorities have discretion to dispose of land for less than best consideration where it will help to secure the promotion of improvement of the economic, social or environmental well-being of the area Authorities should also consider making full use of the registers of unused and under-used land owned by public bodies as an aid to identifying suitable locations Authorities should consider whether to exercise their compulsory purchase powers to acquire an appropriate site 	<p>The SA must consider impacts on existing communities, including safety and amenity, impacts from the scale of new sites and pressure on the local infrastructure.</p> <p>Avoidance of designated sites will be highlighted as a requirement, but use of brownfield, untidy or derelict land can be encouraged as this may help to enhance the environment and increase openness.</p> <p>Key issues for sustainability will include:</p> <ol style="list-style-type: none"> Promotion of peaceful and integrated co-existence between the site and the local community Wider benefits of easier access to GP and other health services Children attending school on a regular basis Provision of a settled base that 	

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	<ul style="list-style-type: none"> To promote more private gypsy and traveller site provision in appropriate locations through the planning system, while recognising that there will always be those who cannot provide their own sites To help to avoid gypsies and travellers becoming homeless through eviction from unauthorised sites without an alternative to move to 	<p>appropriate site</p> <ul style="list-style-type: none"> Cooperation between neighbouring authorities can increase flexibility in site provision. <p>(47) Gypsies and travellers in rural areas often face difficulties in securing an adequate supply of affordable land for their needs. Where this occurs, local planning authorities in rural areas should include a 'rural exception site policy' in the relevant DPD.</p> <p>(49) New gypsy and traveller sites in the Green Belt are normally inappropriate. Alternatives should be explored before such locations are considered.</p> <p>(54) Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing undue pressure on the local infrastructure.</p> <p>(56) LA's should identify sites suitable for mixed residential</p>	<p>reduces the need for long-distance travelling and possible environmental damage caused by unauthorised encampment</p> <p>5. Not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans</p> <p>In identifying the sustainability of sites thought should be given for locations in or near existing settlements with access to local shops, doctors and schools, highways considerations and for the potential for noise and other disturbance from movement of vehicles on the site and on site business activities.</p> <p>The circular, however, does not discuss possibilities to remediate contaminated land for use. Although for this land use it may be perceived as too costly.</p>	

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
		<p>and business uses, having regard to the safety and amenity of the occupants and their children, and neighbouring residents. If mixed sites are not practicable, authorities should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another. Mixed uses are not permitted on rural exception sites.</p> <p>The DPD must consider Vehicular access from the public highway, provision for parking, turning and servicing on site, and road safety for occupants and visitors.</p> <p>Sites should not be located on significantly contaminated land.</p>		
<p>ODPM - Sustainable Communities: Homes for all 2005</p>	<p>This strategy builds on the <i>Sustainable Communities Plan</i>. The Plan set out a vision of sustainable communities for the next 15 to 20 years and a programme for immediate action.</p> <p>The aims are to:</p> <ul style="list-style-type: none"> • Ensure that there are enough 	<p>The DPD must respond by providing adequate sites for Gypsy and Travellers that will promote sustainable and mixed communities. The DPD must support the provision of housing responding to the needs of the Gypsy and Traveller population.</p>	<p>The SA should comment on the degree to which options, policies and sites identified will promote sustainable communities and provide sites of a nature to be adequate to fulfil required needs.</p>	<p>Inclusive Communities</p>

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	<p>high quality homes across the whole spectrum of housing - owner occupied, social rented and private rented</p> <ul style="list-style-type: none"> • Help more people to own their home • Make sure that all social tenants, and seven out of ten vulnerable people in the private sector, have a decent home • Create sustainable, mixed communities in both rural and urban areas, with the jobs, services and infrastructure they need to thrive • Provide for those who need more support to meet their housing needs and aspirations, including halving numbers in temporary accommodation • Provide for those who choose alternative types of accommodation, such as Gypsies and Travellers, but crack down on unauthorised development • Protect and enhance the environment, our historic towns and cities and the countryside. 			

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
Regional				
Regional Housing Strategy 2005-2010	Housing policies relating to specific population groups are proposed, with the aim of ensuring their integration into the wider community of the East of England. These cover members of black and minority ethnic communities including Gypsies and Travellers, migrant workers, asylum seekers, and refugees.	<p>The DPD must seek to create inclusive communities of which housing makes a contribution towards. The DPD will support the provision of mixed communities and widen choice, and take action on homelessness.</p> <p>The strategy includes housing policies specific to Gypsies and Travellers that will influence the DPD. Key information includes:</p> <ul style="list-style-type: none"> Proposals to meet the needs of members of the travelling community who choose to settle and live in permanent housing. Funding is available to ensuring that adequate provision is made for the housing needs of Gypsies and Travellers. 	<p>The SA must ensure the DPD promotes social inclusion and as part of this adequate housing.</p> <p>Choice could still be included in housing tenure, whether caravans or permanent housing.</p>	Inclusive Communities
Sub - Regional				
Cambridge Sub-regional Traveller Needs Assessment May 2006	This Needs Assessment assesses service needs for Gypsies and Travellers in the Cambridge area. The area covered is the Cambridge sub-region and West Norfolk. This	<p>The DPD must respond to, and consider the following:</p> <ul style="list-style-type: none"> A pressing need for more sites of all kinds (public and 	<p>The SA must consider the following in undertaking its assessments:</p>	Inclusive communities, Healthy Communities

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	<p>region, and West Norfolk. This Needs Assessment satisfies the requirement of an assessment of the accommodation needs of Gypsies and Travellers under the Housing Act 2004 and ODPM Guidance 2006</p>	<p>private, long-stay and transit)</p> <ul style="list-style-type: none"> • Gypsies /Travellers would prefer small, self-owned long stay sites for family groups, preferably on the edge of a village, and near established Gypsy/Traveller communities • 110-130 Permanent pitches are required in South Cams • Types of work have changed over recent years contributing to severe economic disadvantage and social exclusion. Family networks and informal reciprocal arrangements are important for encouraging and sustaining economic activity. • The Gypsy and Traveller population have a high incidence of serious health problems, especially children’s special educational and care needs, and educational disadvantage. • Gypsy and Travellers suffer high levels of racism from 	<ul style="list-style-type: none"> • Needs based on Location • Impact on economic activity • Health and education • Social exclusion • Provision of open space • Drainage and flooding issues • Accessibility to shops and services, and for those with disabilities 	

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
		<p>neighbours, feelings of isolation and loss of identity, and drug abuse on estates.</p> <p>The needs assessment indicates that the DPD will need to provide long-stay or 'settled' sites but also transit sites should be provided for those who are travelling. The assessment indicates that transit and residential sites should not be placed at the same location.</p> <p>Existing council owned sites have been criticised for a lack of open space, adequate drainage, disability access, proximity to shops and services, the structure of extended families undermined due to lack of expansion space and lack of fire prevention measures.</p> <p>New plots should consider:</p> <ul style="list-style-type: none"> • Household sizes can be large so pitches should be provided for larger family groups 		

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
		<ul style="list-style-type: none"> • More flexibility to accommodate friends and relatives • More old age pension sites with open spaces • Communal and laundry facilities 		
District				
<p>South Cambridgeshire Local Plan 2004</p>	<p>The plan is the existing development plan for South Cambridgeshire District Council. The document includes existing policy on Gypsy and Travellers (HG23). This has key considerations including:</p> <ol style="list-style-type: none"> 1) Location to services 2) Minimising impact on adjoining residents 3) Rural character and appearance 4) Landscaping scheme will be required 5) Parking and access 6) Impact on heritage and archaeology, and nature conservation interest 7) Local service infrastructure 	<p>The existing policy and experience in its use may provide a starting point for inclusion of options for the new DPD</p>	<p>The SA will assess impacts of the DPD options, policies and site allocations on the elements of concern included in the existing policy, such as landscape character, heritage, impact on local infrastructure etc.</p>	<p>Land and Water Resources, Biodiversity, Landscape and Townscape, Healthy Communities, Inclusive Communities,</p>

Plan	Relevant Plan Objectives	Implications for the DPD	Implications for the SA	Link to SA topics in the Scoping Report
	supply 8) Would not detract from use of public rights of way			

APPENDIX B – BASELINE INFORMATION

Table I: Estimated Gypsy/Traveller population in study area districts, ranked and rounded
(Source: Cambridge Sub-Region Traveller Needs Assessment)

District	Caravans	Households in caravans	Households in housing	Total households 2005	Total households 2010	Population 2005
Fenland	485	285	309	594	689	2851
South Cambs	425	250	28	278	322	1344
East Cambs	180	106	115	221	257	1061
King's Lynn & West Norfolk	160	94	24	118	137	566
Peterborough	120	71	8	79	92	379
Forest Heath	65	38	10	48	55	230
Huntingdon	60	35	5	40	46	192
Cambridge City	30	18	37	55	64	264*
St Edmundsbury	10	6	2	8	9	38
Total	1535	903	538	1441	1671	6915

* The figure for Cambridge City may be high. Taking into account the high proportion of housed Gypsies/travellers compared to those in caravans in the City gives a lower estimate of around 225.

Table II: Average unauthorised caravan numbers by district, 2002-2004¹⁷ (Source: Cambridge Sub-Region Traveller Needs Assessment)

District	Unauthorised Caravans
Fenland	165
South Cambs	87
East Cambs	22
King's Lynn & West Norfolk	46
Peterborough	1
Forest Heath	21
Huntingdonshire	14
Cambridge City	3
St Edmundsbury	6

¹⁷ Figures are estimated and are identified as cautious within the regional needs assessment.

APPENDIX C – SUSTAINABILITY OBJECTIVES

SA Topic	SA objectives	Decision Making Criteria
Land and Water Resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	<ul style="list-style-type: none"> • Will it use land that has been previously developed? • Will it use land efficiently? • Will it protect and enhance the best and most versatile agricultural land?
	1.2 Reduce the use of non-renewable resources including energy sources	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases by reducing energy consumption? • Will it lead to an increased proportion of energy needs being met from renewable sources?
	1.3 Limit water consumption to levels supportable by natural processes and storage systems	<ul style="list-style-type: none"> • Will it reduce water consumption? • Will it conserve ground water resources?
Biodiversity	2.1 Avoid damage to designated sites and protected species	<ul style="list-style-type: none"> • Will it protect sites designated for nature conservation interest?
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	<ul style="list-style-type: none"> • Will it conserve species, reversing declines, and help to enhance diversity? • Will it reduce habitat fragmentation? • Will it help achieve Biodiversity Action Plan targets?
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	<ul style="list-style-type: none"> • Will it improve access to wildlife, and wild places? • Will it improve access to the wider countryside through the network of public rights of way? • Will it maintain and, where possible, increase the area of high-quality green space in the District? • Will it promote understanding and appreciation of wildlife?
Landscape, townscape and archaeology	3.1 Avoid damage to areas and sites designated for their historic interest, and protect their settings.	<ul style="list-style-type: none"> • Will it protect or enhance sites, features of areas of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)?
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character	<ul style="list-style-type: none"> • Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? • Will it protect and enhance open spaces of amenity and recreational value? • Will it maintain and enhance the character of settlements?

SA Topic	SA objectives	Decision Making Criteria
	3.3 Create places, spaces and buildings that work well, wear well and look good	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it lead to developments built to a high standard of design and good place making?
Climate change and pollution	4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases? • Will it improve air quality? • Will it reduce traffic volumes? • Will it support travel by means other than the car? • Will it reduce levels of noise or noise concerns? • Will it reduce or minimise light pollution? • Will it improve water quality including by reducing diffuse and point source water pollution?
	4.2 Minimise waste production and support the recycling of waste products	<ul style="list-style-type: none"> • Will it reduce household waste? • Will it increase waste recovery and recycling?
	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	<ul style="list-style-type: none"> • Will it minimise risk to people and property from flooding, storm events or subsidence?
Healthy Communities	5.1 Maintain and enhance human health	<ul style="list-style-type: none"> • Will it substantially reduce mortality rates? • Will it encourage healthy lifestyles, including travel choices?
	5.2 Reduce and prevent crime, and reduce the fear of crime	<ul style="list-style-type: none"> • Will it reduce actual levels of crime? • Will it reduce fear of crime?
	5.3 Improve the quantity and quality of publicly accessible open space	<ul style="list-style-type: none"> • Will it increase the quantity and quality of publicly accessible open space?

SA Topic	SA objectives	Decision Making Criteria
Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities, including health, education and leisure (shops, post offices, pubs etc)? • Will it improve quality and range of key local services and facilities, including health, education and leisure (shops, post offices, pubs etc)? • Will it improve accessibility by means other than the car, and improve the attractiveness of environmentally better modes including public transport, cycling and walking? • Will it support and improve community and public transport?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society, including the elderly and disabled?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it support the provision of a range of housing types and sizes, including affordable and key worker housing, to meet the identified needs of all sectors of the community? • Will it reduce the number of unfit homes? • Will it meet the needs of the travelling community?
	6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it encourage engagement with community activities?
Economic Activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	<ul style="list-style-type: none"> • Will it encourage business development? • Will it improve accessibility to employment by means other than the car? • Will it improve the range of employment opportunities to provide a satisfying job or occupation for everyone who wants one? • Will it encourage the rural economy and diversification?

SA Topic	SA objectives	Decision Making Criteria
	7.2 Support appropriate investment in people, places, communications and other infrastructure	<ul style="list-style-type: none"> • Will it improve the level of investment in key community services and infrastructure? • Will it support provision of key communications infrastructure, including broadband? • Will it improve access to education and training, and support provision of skilled employees to the economy?
	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy	<ul style="list-style-type: none"> • Will it improve business development and enhance competitiveness? • Will it support the Cambridge area's position as a world leader in research and technology based industries, higher education and research, particularly through the development and expansion of clusters? • Will it support sustainable tourism? • Will it protect the shopping hierarchy, supporting the vitality and viability of Cambridge, town, district, and local centres?

APPENDIX D – CONSULTATION RESPONSES

Consultation Body	Comment	Response
<p>English Nature</p>	<p>In terms of impacts on nature conservation interests, species-rich grasslands are a wildlife habitat that may be particularly vulnerable to unauthorised occupation. These sites can also include woodlands which have accessible and open rides. Sites with rare (and especially immobile) species are of course also at direct risk.</p> <p>Damage can occur directly from vehicles, caravans and trailers, along with storage of materials and deposition of waste. There have been instances where horses have been put on nature conservation sites without permission, causing extensive poaching and overgrazing resulting in enrichment and weed invasion</p> <p>In view of the difficulties in preventing repeated incursions of this type, it is important therefore that there are provisions for sufficient numbers of suitably located alternative authorised sites that can be used by gypsies and travellers in South Cambridge.</p>	<p>Agreed: This information has been added to Table 2, which identifies key sustainability issues.</p> <p>The issues also acknowledge as stated a need to provide authorised sites. Later assessment will consider the decrease in potential ecological damage of authorised sites.</p>
	<p>On page 12 'Considerations Of Nature Heritage Designations' we support the necessity to have tight criteria to ensure any proposed site does not have an impact on sites with nature conservation interest.</p>	<p>Noted: Support is welcomed for the environmental constraints and opportunities highlighted as key issues.</p>
	<p>A designation map should be included that shows the statutory designated sites including Special Areas of Conservations (SACs), Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), and also make reference to sites with known legally protected species with county wildlife sites and other sites with priority Biodiversity Action Plan habitats.</p>	<p>Agreed: Designation maps will provide valued information and should also include Heritage designations such as scheduled ancient monuments and archaeological priority zones. It is recommended that mapping of these land uses be used in the assessment of site allocations in the second stage of the issues and options assessment.</p>

Consultation Body	Comment	Response
English Nature	Appendix A: it may also be appropriate to add reference to PPS 9: Biodiversity and Geological Conservation. In addition this may also be a suitable place to refer to South Cambridgeshire District Councils draft Biodiversity Strategy.	Disagree: PPS9 is considered in the councils Scoping Report, which acts as this reports parent document.
	The sustainability objectives, particularly detailed under the Biodiversity SA topic are generally supported. However it is noted there may be some possible conflict with the bullet point 'improving access to wildlife and wildlife and wild places	Noted: Support for the objectives is welcomed, and likely to reflect previous consultation on the Councils Scoping Report. The advice regarding the bullet point will be considered in the subsequent assessment stages.
Environment Agency	We support the identification and inclusion of flood risk, re-use of brownfield land and protection of natural habitats as environmental considerations within the report.	Noted: Support is welcomed for the environmental constraints and opportunities highlighted as key issues.
	Foul water drainage should be considered as an additional criterion under the 'Environmental considerations for location of sites' (section 2.3). We would recommend that sites be connected to the public foul sewer for the appropriate disposal of foul drainage. In the eventuality of a connection to the public foul water sewer not being available, the suitability of any non-mains sewerage systems must be effectively demonstrated.	Agree: Information regarding foul water has been added to Table 2 as a key issue.
	Consideration must be given to the appropriate collection of waste from such sites and for the sites to be appropriately located, or have adequate access to, recycling facilities.	Agree: Information regarding waste collection and recycling has been added to Table 2 as a key issue.
Friends, Families and Travellers	We are very pleased that S Cambs recognises the pressing need for accommodation in its district for Gypsies and Travellers and that the Cambridge Sub-Region Accommodation Assessment is a key document alongside Circular 1/2006. In general we welcome the depth and detail of the Scoping Report and are glad that at long last local authorities are beginning to recognise the need for good quality, detailed examination of this issue	Noted: The regional needs assessment is considered a key document to inform the Sustainability Appraisal. Detailed and in depth information is considered essential for the examination of the DPD.

Consultation Body	Comment	Response
<p>Friends, Families and Travellers</p>	<p>We are concerned that on p6 the table does not highlight the Government target for meeting some of the under-provision in the next 3-5 years. This implies early action should be encompassed in the Scoping Report. This section should highlight the main intentions of the Circular – See para 12 of the Circular. This is not a place to highlight issues such as dominance of nearest settled communities and also not a place to make highway issues such a priority. Gypsy and Traveller accommodation should be considered as no different than bricks and mortar housing and not as it seems to here in terms of criteria based barriers to site development. The Circular 1/2006 recognises the past use of criteria to effectively prevent development and lays down good practice guidelines.</p>	<p>Agree in part: The main intentions of the Circular (including meeting some of the under provision in the next 3-5 years have already been highlighted in the table in Appendix A which details a summary of the objectives of the circular as well as implications for the GTDPD and the SA. Table 1 (p6-7) provides a further summary, which has been reviewed. The intentions of the circular have been added as key messages for the DPD to reflect.</p> <p>Table 1 summarises all issues raised by the review of plans and programmes to identify all issues. Sustainability issues are not confined to provisions for identified need. Paragraphs 54 of the circular states that “Sites should respect the scale of, and not dominate the nearest settled community. They should also avoid placing an undue pressure on the local infrastructure”. Paragraph 66 states “Sites, whether public or private, should be identified having regard to highways considerations”. As with bricks and mortar housing these are considerations that will affect the sustainability of future development and as such are not as implied criteria to place barriers to site development.</p>
	<p>Section 2.2. We are concerned that there is no evidence of recommendations here for assessment of needs to be carried out at a local level top add to the sub-regional assessment as a key influence of sustainability. There is no recommendation for the development of contact with local groups and individuals within the Gypsy and Traveller community.</p>	<p>Issue for the DPD: Whilst local level information may be useful this information is beyond the scope for strategic level sustainability appraisal. However, contact with local groups should be encouraged through the consultation for the issues and options stage of the plan making process that the Council is undertaking.</p>
	<p>We are concerned that the baseline data presented has not considered and does not encompass the detailed history of planning applications, enforcement proceedings, planning and enforcement appeals and evictions by the local authority and the police.</p>	<p>Issue for the DPD: This information does not influence the sustainability of future development. It may however, be an input into preparation of the DPD site allocations. These can identify reasons for site refusal and decisions could be revisited if appropriate.</p>

Consultation Body	Comment	Response
Friends, Families and Travellers	<p>GTAA are only one of a range of information sources available. However, we do recognise the depth and quality of the GTAA for your district. This section should identify what additional information is required and make recommendations for the rapid acquisition of this data to inform developing policy.</p>	<p>Issue for the DPD: Additional data would provide detail that is beneficial to the background of the DPD itself, rather than adding to the SA.</p>
	<p>On p8 this document refers to the fact that 110-130 new pitches are needed to meet increasing demand for the period to 2010. It is clear that the Cambridge sub region assessment says that there are at least 55-65 unauthorised caravan households which have need now. This should be accurately reflected in the draft report. The 110-130 figure refers to existing need, overcrowding, transfer from housing and family formation.</p>	<p>Agree: The information highlighted has been added to the relevant section (2.2.7).</p>
	<p>There seems to be an internal conflict in the documentation supplied. On the one hand the Scoping Report talks about the need for 110-130 new pitches by 2010 yet the accompanying letter talks of adoption of the SCDC policy in 2009. This would leave a scant year for the fulfilment of the needs for a large number of sites if site permissions are delayed until the policy has been formally adopted. Some clarification of this would be welcome.</p>	<p>Issue for the DPD: The issue is noted. However, allocated figures are not produced within the East of England Regional Spatial Strategy (RSS). The DPD will aim to address shortfall as early in the planning system as is permissible. Detail and comment on this matter should be raised during the Issues and Options stage of the plan making process.</p>
	<p>FFT Hold that the health, employment and educational position of many Gypsies and Travellers is now well established beyond and reasonable measure of doubt and that and that difficulties over accommodation play a major role in this situation. This should be clearly reflected here (2.2.9) although we are pleased that it is highlighted in Table 2 (p10).</p>	<p>Agree: Relevant information added to section 2.2.10.</p>

Consultation Body	Comment	Response
<p>Friends, Families and Travellers</p>	<p>We are very concerned that there is no mention here of transitional or interim arrangements which should be put into place following government guidelines (Circular 01/2006 paras 41-6). Given the overwhelming and pressing need we are of the opinion that the council should issue temporary planning permissions following Government advice. Those Gypsy and Traveller owned or rented sites without the benefit of planning permission should be granted temporary permission to cover the period until realistic site allocations have been made on the ground. This would have the benefit of allowing the development of a dialogue with Gypsies and Travellers in an environment free from the strains imposed by the threat of enforcement or eviction action. This would produce a win-win situation in the long term.</p>	<p>Agree: The SA has been updated to reflect the current need for pitches. Table 2 reflects the potential for current unauthorised sites to be granted temporary permission to meet some of the existing need. The Issues and Options stage of the formation of the DPD will consider the possibility of these and the SA will consider the sustainability of this approach.</p>
	<p>The issue is not simply of crude accommodation figures but of creating a quality environment which will itself go a long way towards helping mitigate the problems in health, employment, education and welfare</p>	<p>Agree: Table 2 now reflects this advice</p>
	<p>Issues with existing locations in regards of issues surrounding noise and overlooking produce issues affecting the lifestyle of Gypsies and Travellers at the existing Blackwell site making life near unendurable for residents and lacking in privacy. (Summarised)</p>	<p>Agree: Table 2 now reflects that noise and visual impacts on Gypsy and Travellers sites (predominantly from roads) should be considerations for allocating sites.</p>
	<p>Whilst the table recognises the need for a range of sites it only identifies those in terms of ownership and period of occupation. There is work underway at the DCLG concerning site design and this, in addition, means of getting away from the fixed mindset of long stay v transit, private versus public. For example there is potential for mixed housing and caravan sites- so called group housing, which has been used, in other countries. There are also the possibilities of co-ownership which are well established in the bricks and mortar sector.</p>	<p>Issue for the DPD: These are issues that the Issues and Options stage of the DPD should include. These issues and ideas can be raised and discussed in this forum and assessed for sustainability during later stages of the SA process</p>

Consultation Body	Comment	Response
<p>Friends, Families and Travellers</p>	<p>P22 We are glad that the implications for the DPD recognise that there may be a need for rural exceptions and we commend this. It also implicitly recognises that there may well be a need for minor adjustments to the Green Belt. There may be merit in examining ‘low impact’ sites where there exists the possibility of returning land to its former state when the need no longer exists (see also p31 SA Objective 1.1), if this is compatible with providing a good quality living environment for the site inhabitants. It should be pointed out here that at Chesterton Fen a site within the Greenbelt is identified as a ‘special area’ in the existing Local Plan. We feel that the district should be taken as a whole when looking for site allocations. The identification of sites in a sequence of increasing planning constraints will lead to undue delay in site allocation. There is by implication and example already an ‘exceptions policy’ in operation within the Green Belt. This should be mentioned in the Scoping Report.</p>	<p>Disagree: The approach may offer an alternative strategy to allocating sites for Gypsies and Travellers, of which this Scoping Report identifies as a pressing need. However, it is not the correct report in which to suggest this as a sustainable approach. The approach of rural exceptions, an allocation of green belt land for allocating Gypsy and Traveller sites should be an explicit option in the Issues and Options report and independently assessed for its sustainability in the Initial SA Report.</p>
	<p>P24 We feel the term ‘crack down’ is inappropriate as it seems to single out Gypsies and Travellers for draconian treatment and reflects some of the more inflammatory statements in the local and national press over the past two years. Terms such as this have no place in a sober document. The only reason for unauthorised development has been the lack of planning provision</p>	<p>Disagree: It is understood that the term may be viewed as inappropriate. However the text is taken directly from the ODPM publication “Sustainable Communities: Homes for All”, 2005. The text will therefore remain unchanged.</p>
	<p>P30 (Appendix B) The table is stated as not representing current need, alternative figures are mentioned. 173 unauthorised caravans are stated to be the average rather than the 87 quoted. (Summarised). The authors of the sub-regional study make it clear that their estimates have been cautious and conservative and it could well be expected that the demand may well be higher than their estimates. This should be mentioned in the report</p>	<p>Agree in part: The data in Appendix B refers to the cautious nature of the data supplied in the needs assessment. However, this data is within the published document and other figures have not been identified in published documents and therefore have cannot be included. The supply of further information from Friend, Families, Travellers is welcomed.</p>

Consultation Body	Comment	Response
Friends, Families and Travellers	<p>One of the general concerns that FFT has over this whole new planning process are the opportunities for delay. We are aware of a number of councils around the country who, when under a duty to provide before the repeal of that section of the 1968 Act in 1994, took an approach of identifying sites one by one. They went through the process a site at a time. In one council area in the South West each site still took a year to go through the process. Each site was rejected in turn. The council concerned still had not provided a site after 20 years of this procedure. We would Thus wish to see in a Scoping Report the means to providing sites within a reasonable period. The government's aims are clear and the needs are clear and urgent as outlined in the SA Scoping report.</p>	<p>Issue for the DPD: This SA Scoping Report will not provide the means to providing sites within a reasonable period. This issue should be covered in the Issues and Options stage of the process to help identify policy and potential sites.</p>
	<p>We would also wish to see in the Scoping Report a mention of the need to take into account and plan for longer term and for there to be a reference to the need for an ongoing assessment of need.</p>	<p>Agreed: The Scoping Report now includes paragraph 2.8.8, which details the process to ensure that longer term needs will be considered. The RSS will provide an ongoing assessment to cater for need to 2021.</p>
Countryside Agency	<p>I have considered the Addendum to the LDF Scoping Report. Given the statements on the intention to consider the provision of open space, and to assess impacts of the DPD options, policies and site allocations on the elements of concern included in the existing policy of the South Cambs Local Plan which include landscape character, and given the SA objectives set out in the LDF Scoping Report which are reproduced in Appendix C relating to landscape, townscape and archaeology, and to publicly accessible open space, we have no comments to make on S Cambs's Gypsy and Traveller Development Plan Document - Addendum to LDF Scoping Report.</p>	<p>No Action Required</p>

GLOSSARY

Alternative	See 'options'.
Area Action Plan (AAP)	A type of Development Plan Document focusing on implementation, providing an important mechanism for ensuring development of an appropriate scale, mix and quality for key areas of opportunity, change or conservation.
Annual Monitoring Report (AMR)	Assesses the implementation of the Local Development Scheme and the extent to which policies in Local Development Documents are being achieved.
Consultation Body	An authority which because of its environmental responsibilities is likely to be concerned by the effects of implementing plans and programmes and must be consulted under the SEA Directive. The Consultation Bodies in England are the Countryside Agency, English Heritage, English Nature and the Environment Agency.
Core Strategy	Should set out the key elements of the planning framework for the area. It should comprise: a spatial vision and strategic objectives for the area; a spatial strategy; core policies; and a monitoring and implementation framework with clear objectives for achieving delivery.
Development Plan Documents (DPD)	A type of Local Development Document. DPDs include the Core Strategy, site specific allocations of land and Area Action Plans (where needed).
Indicator	A measure of variables over time, often used to measure achievement of objectives.
Output indicator	An indicator that measures the direct output of the plan or programme. These indicators measure progress in achieving a plan objective, targets and policies.
Significant effects indicator	An indicator that measures the significant effects of the plan.
Contextual indicator	An indicator used in monitoring that measures changes in the context within which a plan is being implemented.
Local Development Document (LDD)	There are two types of Local Development Document: Development Plan Documents and Supplementary Planning Documents.

Local Development Framework (LDF)	Sets out, in the form of a 'portfolio', the Local Development Documents which collectively deliver the spatial planning strategy for the area in question. The LDF also includes the Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.
Local Development Scheme (LDS)	Sets out the local authority's programme for preparing the Local Development Documents.
Local Development Regulations	Town and Country Planning (Local Development) (England) Regulations 2004.
Mitigation	Used in this guidance to refer to measures to avoid, reduce or offset significant adverse effects on the environment.
Objective	A statement of what is intended, specifying the desired direction of change in trends.
Option	The range of rational choices open to plan-makers for delivering the plan objectives. For the purposes of this guidance 'option' is synonymous with 'alternative' in the SEA Directive.
Plan	For the purposes of the SEA Directive this is used to refer to all of the documents to which this guidance applies, including Regional Spatial Strategy revisions and Development Plan Documents. Supplementary Planning Documents are not part of the statutory Development Plan but are required to have a sustainability appraisal.
Regional Spatial Strategy (RSS)	The Regional Spatial Strategy is a statutory development plan document which incorporates the Regional Transport Strategy, and provides a spatial planning framework for the preparation of Local Development Documents, Local Transport Plans, and regional and sub regional strategies. The Regional Spatial Strategy provides a development strategy for its specific region for the next 15-20 years ahead.).
Scoping	The process of deciding the scope and level of detail of a Sustainability Appraisal.
SEA Directive	European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
SEA Regulations	The Environmental Assessment of Plans and Programmes Regulations 2004 (which transposed the SEA Directive into law).

- Statement of Community Involvement (SCI)** A statement setting out the consultation procedures for a Local Planning Authority. Explains to stakeholders and the community how and when they will be involved in the preparation of the Local Development Framework, and the steps that will be taken to facilitate this involvement.
- Strategic Environmental Assessment (SEA)** Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. In the UK, SEA is increasingly used to refer to an environmental assessment in compliance with the 'SEA Directive'.
- Supplementary Planning Document (SPD)** A type of Local Development Document. Supplementary Planning Documents are intended to elaborate on DPD policies and proposals but do not have their statutory status.
- Sustainability Appraisal (SA)** Generic term used to describe a form of assessment which considers the economic, social and environmental effects of an initiative. SA, as applied to Local Development Documents, incorporates the requirements of the SEA Directive.
- Sustainability issues** The full cross-section of sustainability issues, including social, environmental and economic factors.