



**Haverling**  
LONDON BOROUGH

## **Gypsy and Traveller Sites Development Plan Document**

**Final Sustainability Appraisal Report**

**March 2012**

Head of Regeneration, Policy and Planning  
London Borough of Havering  
Town Hall  
Main Road  
Romford  
RM1 3BD

March 2012

## Contents

<b>1</b>	<b>Non-technical Summary .....</b>	<b>1</b>
	Introduction .....	1
	Sustainability Appraisal .....	1
	Sustainability Appraisal Findings .....	2
<b>2</b>	<b>Introduction.....</b>	<b>3</b>
	Gypsy and Traveller Sites DPD .....	3
	Regulatory context .....	3
	Sustainability Appraisal of the Proposed Submission Document.....	4
	Next steps and how to respond.....	5
<b>3</b>	<b>Sustainability Context and Baseline Characteristics .....</b>	<b>6</b>
	Review of the Relevant Plans and Programmes.....	6
	Baseline Information .....	6
	Key Sustainability Issues .....	7
	Sustainability Appraisal (SA) Framework.....	9
<b>4</b>	<b>Appraisal of Alternatives .....</b>	<b>13</b>
	Developing the Options.....	13
<b>5</b>	<b>Appraisal of Policies and Site Allocations .....</b>	<b>16</b>
	Policy and Site Appraisals.....	16
	Discounted Site Appraisals .....	20
<b>6</b>	<b>Mitigation and Monitoring.....</b>	<b>22</b>
	Mitigation.....	22
	Monitoring .....	22
	<b>Appendices.....</b>	<b>23</b>
	Appendix A: Statement on compliance with the SEA Directive and Regulations.....	23
	Appendix B: Consultation Responses .....	24
	Appendix C: Relevant Plans, Policies, Programmes and Strategies .....	26
	Appendix D: DPD Objectives Assessment Table.....	27
	Appendix E: Options Assessment Summary Matrix.....	29
	Appendix F: Options Assessment Summary Tables.....	30
	Appendix G: Policy and Sites Assessment Summary Matrix .....	33

### ***List of Tables***

Table 1: Summary of identified sustainability issues	7
Table 2: Sustainability Appraisal Framework	9
Table 3: Sustainability Appraisal scoring system	12
Table 4: Gypsy and Traveller Sites DPD policy options	13

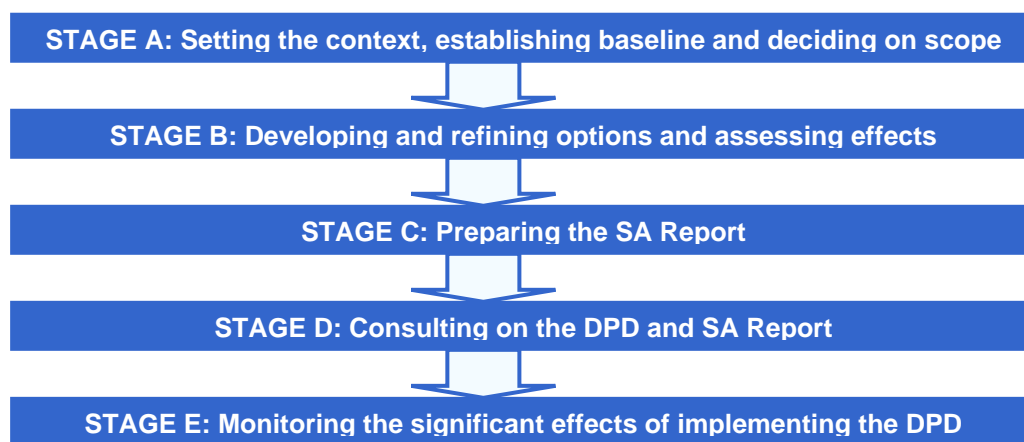
# 1 Non-technical Summary

## Introduction

- 1.1 Havering's Local Development Framework (LDF) consists of a suite of planning documents that collectively guide the future planning of the borough. The LDF is led by the Core Strategy and Development Control Policies DPD, which sets out Havering's vision and objectives for the planning of the borough up to 2020, as well as detailed development control policies that apply across the whole of the borough.
- 1.2 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF, with the purpose of implementing the provision within Core Policy CP2 (Sustainable Communities) to meet the accommodation needs of the Gypsy and Traveller community in Havering within the overall framework of the Core Strategy, which includes the protection of the Green Belt.

## Sustainability Appraisal

- 1.3 This report documents the process of the Sustainability Appraisal (SA) of the Havering Gypsy and Traveller Sites DPD. The purpose of SA is to promote sustainable development through the plan making process. It is a key tool used to appraise the social, environmental and economic effects of plans, strategies and policies. The SA process incorporates the requirements set out in European Directive 2001/42/EC on the environmental assessment of plans.
- 1.4 The SA process involves five stages that occur in parallel with the production of the DPD.



- 1.5 Stage A involved establishing the framework for undertaking the SA – a set of objectives against which the DPD can be assessed – together with the evidence base for the appraisal. The framework and evidence base were set out in the Draft Scoping Report which was subject to consultation, and the Final Scoping Report, which was published in October 2010.
- 1.6 Stage B of the SA process focused on the appraisal of the options put forward in the Issues and Options report against the assessment framework and summarising their potential social, environmental and economic implications. This was set out in the Interim Sustainability Appraisal which was published for consultation, together with the Issues and Options Report in June 2011. The appraisal findings were taken forward into the development of the proposed policies for the Gypsy and Traveller Sites DPD.

- 1.7 This report forms Stage C of the SA process. It documents the appraisal of the Proposed Submission Document for the Gypsy and Traveller Sites DPD and summarises the potential economic, social and environmental implications. The report has been prepared to demonstrate that sustainability considerations have been incorporated into the development of the DPD and to provide information for stakeholders as well as an audit trail of the appraisal process.
- 1.8 Section 5 of the report presents the findings of the appraisals of the policy and site allocations in the Proposed Submission Document and of the sites that have been discounted for allocation during the development of the plan.

### **Sustainability Appraisal Findings**

- 1.9 The policies and sites identified in the Proposed Submission Document recognise the need to identify sufficient pitches in a way which, so far as possible, meets the needs of Havering's existing gypsies and travellers while minimising the effect on the Green Belt which has only been allocated where this is justified by 'very special circumstances'.
- 1.10 The policies and site allocations being taken forward into the Gypsy and Traveller Sites Proposed Submission Document perform well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against most other objectives. The policies and site allocations have a neutral or negligible impact against the economic objective of the SA Framework.
- 1.11 The significant effects identified in this SA Report include positive impacts for the SA objectives relating to decent homes, reducing social exclusion, improving health and education. Some potentially negative impacts relating to biodiversity and the built and natural environment can be mitigated against through site design and layout guidance and specific criteria set out for particular sites in the DPD policies.
- 1.12 The SEA Directive requires certain information to be provided as part of the environmental report. Appendix A sets out where the required information can be found within this report.

## 2 Introduction

- 2.1 This Final Sustainability Appraisal Report documents Stage C in the Sustainability Appraisal (SA) process for the Gypsy and Traveller Sites Development Plan Document (DPD). It addresses the requirements of Strategic Environmental Assessment (SEA) as required under the European Union Directive 2001/42/EC, and Sustainability Appraisal (SA) as required by Section 39 of the Planning and Compulsory Purchase Act 2004.
- 2.2 This report outlines the Sustainability Appraisal for the Gypsy and Traveller Sites Proposed Submission Document. The Final Sustainability Appraisal Report is being published for consultation alongside the Proposed Submission Document in accordance with SEA Regulations and SA Guidance.

### Gypsy and Traveller Sites DPD

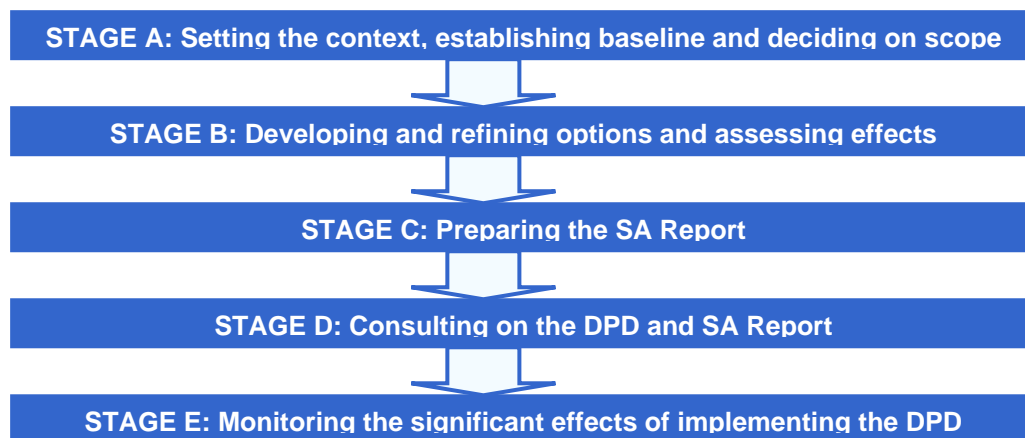
- 2.3 Havering's Local Development Framework (LDF) consists of a suite of planning documents that collectively guide the future planning of the borough over the long term. The LDF is led by the Core Strategy and Development Control Policies DPD, adopted in 2008, which sets out Havering's vision and objectives for the planning of the borough up to 2020, as well as detailed development control policies that apply across the whole of the borough.
- 2.4 The Council has a responsibility to plan for the housing needs of all residents, including the Gypsy and Traveller community. The 2004 Housing Act requires local housing authorities to assess the accommodation needs of Gypsies and Travellers in their area, as part of the wider assessment of housing needs, and produce a strategy on how these needs can be met.
- 2.5 In response to this requirement, the council is preparing a Gypsy and Traveller Sites DPD that details how the Council will make provision for sufficient additional pitches for Gypsies and Travellers. The Proposed Submission Document, published alongside this Final SA Report, provides an opportunity for all individuals, organisations and stakeholders with an interest in provision for Gypsies and Travellers in Havering to give their view and contribute to the development of the Gypsy and Traveller Sites DPD.
- 2.6 The Gypsy and Traveller Sites DPD will be a statutory document within the LDF, with the purpose of implementing the provision within Core Policy CP2 Sustainable Communities to meet the accommodation needs of the Gypsy and Traveller community in Havering, as set out in the Core Strategy.

### Regulatory context

- 2.7 European Directive 2001/42/EC requires that a SEA is undertaken on certain plans and programmes which are likely to have significant effects on the environment; the directive applies to all Local Development Documents (LDD). SEA is a tool for improving the consideration of the environment in the preparation of plans and programmes and aids in minimising negative impacts and optimising positive ones.
- 2.8 The SEA Directive is of a procedural nature, and sets out a legal assessment process that must be followed. Where an assessment is required by the SEA Directive, an environmental report should be prepared containing relevant information as set out in the Directive, identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and

reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

- 2.9 The purpose of SA is to promote sustainable development through the plan making process. It is a key tool used to appraise the environmental, economic and social effects of plans, strategies and policies. Section 19(5) of the Planning and Compulsory Purchase Act 2004 states that local planning authorities must carry out a sustainability appraisal on all local development documents and prepare a report of the findings of the appraisal. Provided it is carried out as recommended by Government Guidance, the SA process fully incorporates the requirements of the SEA Directive.
- 2.10 The SA process is broken into five stages that occur in parallel with the production of the DPD; this integration is fundamental to sound plan making. Planning Policy Statement 12: Local Spatial Planning (June 2008) incorporated changes to the regulations governing development plan production. Under Regulation 25, the requirement to consult the public throughout the preparation of DPD includes specific and general bodies, as well as those residents and/or businesses considered appropriate by the local authority.



- 2.11 Stage A involved establishing the framework for undertaking the SA – a set of objectives against which the DPD can be assessed – together with the evidence base for the appraisal. The framework and evidence base were set out in the Draft Scoping Report which was subject to consultation, and the Final Scoping Report, which was published in October 2010. Responses to this scoping consultation and how they were taken into account are provided in Appendix B.
- 2.12 Stage B of the SA process focused on the appraisal of the options put forward in the Issues and Options report against the assessment framework and summarising their potential social, environmental and economic implications. This was set out in the Interim Sustainability Appraisal which was published for consultation, together with the Issues and Options Report in June 2011. The appraisal findings were taken forward into the development of the proposed submission policies for the Gypsy and Traveller Sites DPD.

### **Sustainability Appraisal of the Proposed Submission Document**

- 2.13 This report comprises Stage C of the SA process. It documents the appraisal of the Proposed Submission Document for the Gypsy and Traveller Sites DPD and summarises the potential social, environmental and economic implications. The

report has been prepared to demonstrate that sustainability considerations have been incorporated into the development of the DPD and to provide information for stakeholders as well as an audit trail of the appraisal process.

- 2.14 Section 5 of the report presents the findings of the appraisals of the policies and site allocations in the Proposed Submission Document and of the sites that have been discounted for allocation during the development of the plan.

### Next steps and how to respond

- 2.15 The Final SA Report must be submitted for consultation alongside the Proposed Submission Document to the statutory consultees and other stakeholders (Stage D of the process).
- 2.16 Consultation on this Final SA Report for the Gypsy and Traveller Sites DPD runs for six weeks from [DATE] 2012 to [DATE] 2012. Copies are available on the Havering website at [www.havering.gov.uk](http://www.havering.gov.uk) Alternatively, you may request a copy from [LDF@havering.gov.uk](mailto:LDF@havering.gov.uk) or a printed copy from:

Development and Transport Planning  
London Borough of Havering  
Town Hall  
Main Road  
Romford  
RM1 3BD

Responses may be sent via email to [LDF@havering.gov.uk](mailto:LDF@havering.gov.uk) or by post to the above address.

- 2.17 Please note that responses cannot be treated as confidential and must be made in a lawful way; the Council will not consider offensive and/or racist representations.
- 2.18 The final stage of the SA process (Stage E) consists of monitoring the significant effects of the plan following the adoption of the SA Report and the Gypsy and Traveller Sites DPD. This is undertaken through the Annual Monitoring Report which includes indicators and targets against which the progress of the Local Development Framework can be measured. Suggestions for monitoring the Gypsy and Traveller Sites DPD are included in section 6 of this report.

### 3 Sustainability Context and Baseline Characteristics

#### Review of the Relevant Plans and Programmes

- 3.1 To establish a clear scope for the SA of the Gypsy and Traveller Sites DPD, and in accordance with SEA Directive requirements, it is necessary to review plans, policies, programmes and strategies that are relevant to the DPD at the Scoping stage.
- 3.2 The first stage of the SA process was undertaken in 2010 with the development and publication of the Scoping Report. In line with Government guidance it acts as an addendum to the Havering Core Strategy SA Scoping Report and reflects a second stage of scoping that contains additional information relevant to the assessment of the Gypsy and Traveller Sites DPD. Appendix A provides a full list of the plans, policies, programmes and strategies that were reviewed.
- 3.3 All relevant plans, policies, programmes and strategies were reviewed in order to identify key sustainability issues that the DPD will need to address and further identify any social, environmental or economic objectives that should be reflected in the SA process. The identification and review of the plans, policies, programmes and strategies provided information to support the evidence base, as well as for framing the SA objectives that have been used to test the DPD.

#### Baseline Information

- 3.4 Collection of baseline information is required under SEA legislation and is a key component of the SA process to provide the basis for predicting and monitoring effects, and to help identify sustainability problems and alternative ways of dealing with them.
- 3.5 The Core Strategy SA Scoping Report provided baseline information at a 'fit for purpose' level, sufficient to provide general information at the borough level. The Gypsy and Traveller Sites DPD Scoping Report supplemented that broad nature of the baseline data provided in the original scoping report with information relevant to the specific focus of the DPD on gypsy and traveller site allocations. The baseline information is summarized in Section 3 of the Final Scoping Report (October 2010) which is available on the Council's website.

#### *Update to Baseline Information*

- 3.6 Concurrent with consultation on the Scoping Report, the Council conducted a call for sites in order to identify suitable locations for Gypsy and Traveller sites. The call for sites process was also used to update the findings of the 2004 Havering Traveller Needs Assessment.
- 3.7 The 2010 update identified a Gypsy and Traveller population living on sites in the borough of 74 households, slightly higher than that projected in the 2004 assessment of 64 households living on sites by 2010. Of the 74 households identified, 49 were living on authorised sites (with permanent, temporary or expected to be granted permission) and 25 were living on unauthorised sites; all sites were privately owned. This figure has been used to update the baseline information collected during production of the Scoping Report, and the figure of 74 households is used within the Issues and Options Report and Proposed Submission Document.

### Key Sustainability Issues

- 3.8 The first stage of the SA process includes identifying the sustainability issues and problems facing the area in question. The SA requirement stipulates the inclusion of economic and social as well as environmental problems.
- 3.9 The Core Strategy SA Scoping Report identified sustainability issues at the borough level, relevant to the spatial scale of the plan. Therefore, the 2010 work focused on identifying additional issues arising from the review of plans, policies, programmes and strategies and baseline information of specific relevance to the Gypsy and Traveller Sites DPD. Table 1 provides a summary of the sustainability issues identified in the Gypsy and Traveller Sites Scoping Report.

Table 1: Summary of identified sustainability issues

Key issues and problems	Evidence and issues for consideration
<b>Social</b>	
(a) Range of accommodation needs	Havering's gypsy and traveller needs assessment shows a preference for small, privately owned sites. While there was no identified need for a transit pitch, sites should normally be of sufficient size to accommodate occasional short term visits from family members. Travelling patterns on authorised sites were found to be seasonal from a permanent base.
(b) Access to services and facilities	Sites should be located within reasonable distance of services and community facilities, in particular schools and essential health services. Sites should allow residents to meet the majority of their needs in the local area, and should support integration with the settled community. Access to employment opportunities should also be considered.
(c) Health and Education	According to Circular 01/2006, gypsies and travellers are believed to experience the worst health and education status of any disadvantaged group in the country. Provision of permanent, authorised residential sites supports uninterrupted access to health care and regular school attendance. Additionally, poor quality accommodation has links to poor health.
(d) Proximity to family	The extended family structure is an important characteristic of the gypsy and traveller community. Sites should normally be of sufficient size to allow for some expansion, and to accommodate (on a short-term basis) visiting members of the extended family and therefore discourage the emergence of nearby unauthorised sites due to lack of space.
(e) Integration with settled community	Location of gypsy and traveller sites can be a contentious issue. The process of DPD production should recognise the sensitivities involved and take the opportunity to promote social cohesion throughout the process. Any sites identified should be of a size and scale appropriate to the local community and should not dominate the settled community. Sites should be located to provide a standard of amenity similar to the settled community while ensuring that noise, vehicle movements and

- other activities have no adverse impact on the safety and amenity of the settled community.
- (f) Ability of local people to be involved in decision making
- There is a need to provide clear guidance to communities on proposals in the DPD through collaborative public involvement so that local people are involved through the development plan process in the decisions surrounding appropriate locations for sites.

---

### Environment

---

- (g) Protection of designated areas (nature, conservation, heritage)
- Sites of conservation value and heritage designation should be protected, and criteria for site assessment clearly defined to ensure that development sites avoid these areas in particular, and minimise adverse effects on surrounding areas in general. Development pressure should be directed away from designated sites and encouraged on brownfield land; sites within the Green Belt should only be authorised in very special circumstances.
- (h) General environmental considerations
- Provision of a settled base reduces the need for long-distance travelling and the potential for environmental damage caused by unauthorised sites and encampments. Proximity to essential services and facilities increases efficient patterns of movement. Use of brownfield land provides an opportunity for improvement to the environment and greater integration with the existing landscape. Sites should provide for access to environmental services, including connections to mains water, electricity supply, sanitation measures, drainage and waste collection to prevent localised pollution.
- (i) Site specific environmental considerations
- Sites should not be located on or in close proximity to known hazards such as contaminated land and industrial sites, or in areas at high risk of flooding. Site assessment should take a sequential approach based on the SFRA. Noise and visual impacts should be considered both for areas adjoining sites, and on the sites themselves.

---

### Economic

---

- (j) Access to work
- Nationally, changes to the labour market have had a detrimental impact on the types of work and employment opportunities available to gypsies and travellers, with a corresponding increase in economic disadvantage, social exclusion and deprivation. However, Havering is in a region (the East and South East) that draws gypsies and travellers to the area because of the greater employment opportunities available. A permanent base can contribute to improved access to employment, so long as site location supports accessibility.
- (k) Provision for on-site business uses
- Sites should be suitable to accommodate mixed residential and business uses, including the equipment required for business activities.
-

### Sustainability Appraisal (SA) Framework

- 3.10 The SA Framework provides the basis by which the sustainability effects of emerging Development Plan Documents are assessed throughout their preparation. The Core Strategy Scoping Report has previously identified issues or problems that informed the Objectives used within the SA Framework. Therefore the original SA Framework developed for the Core Strategy has been used, with minor wording amendments to improve clarity, while maintaining the purpose of the objectives (see Table 2).

Table 2: Sustainability Appraisal Framework

SA Objectives	Sub-objectives	SEA Theme
<b>1. Provide everybody with the opportunity to live in an affordable, decent home.</b>	<p>Will it reduce homelessness and overcrowding?</p> <p>Will it increase the range and affordability of housing?</p> <p>Will it meet the culturally specific accommodation needs of the gypsy and traveller community?</p> <p>Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle?</p> <p>Will it provide housing that encourages a sense of community and enhances the amenity value of the community?</p>	<p>Population</p> <p>Human Health</p> <p>Material Assets</p>
<b>2. Improve accessibility to essential services, facilities and the workplace.</b>	<p>Will it improve accessibility to key local services?</p> <p>Will it reduce the overall need for people to travel by improving their access to the services, facilities and jobs in the place where they live?</p> <p>Will it improve accessibility to work by public transport, walking and cycling?</p>	<p>Population</p> <p>Human Health</p>
<b>3. Offer everyone the opportunity for rewarding, well-located and satisfying employment.</b>	<p>Will it help reduce overall unemployment, particularly long-term unemployment?</p> <p>Will it help to provide opportunities for those most in need of employment?</p> <p>Will it help to improve earnings?</p> <p>Will it encourage business development?</p> <p>Will it help generate a range of employment opportunities?</p>	<p>Population</p> <p>Material Assets</p>
<b>4. Reduce poverty, inequality and social exclusion.</b>	<p>Will it reduce poverty and social exclusion in those areas most affected?</p> <p>Will it improve relations between people from different backgrounds and social groups?</p> <p>Will it promote accessibility for all members of society, including the elderly and disabled?</p>	<p>Population</p> <p>Human Health</p>
<b>5. Improve lifelong learning, skills and education.</b>	<p>Will it improve the qualifications and skills of young people?</p> <p>Will it improve access to education and training, and support provision of skilled employees to the economy?</p>	<p>Population</p> <p>Human Health</p>

SA Objectives	Sub-objectives	SEA Theme
<b>6. Improve the health of the population.</b>	Will it improve access to high quality health facilities? Will it reduce health inequalities? Will it encourage healthy lifestyles, including transport choices?	Population Human Health
<b>7. Reduce crime, the fear of crime and increase community safety.</b>	Will it reduce actual levels of crime and antisocial behaviour? Will it reduce the fear of crime? Will it reduce actual noise levels and disturbances from noise?	Population Human Health
<b>8. Foster community identity and participation.</b>	Will it encourage engagement in community activities? Will it increase the ability of people to influence decisions? Will it improve ethnic relations? Will it positively enhance and promote the perceived sense of place held by the community?	Population Human Health
<b>9. Maintain and enhance biodiversity.</b>	Will it conserve and enhance habitats and species? Will it protect and enhance sites designated for nature conservation interest? Will it help achieve Biodiversity Action Plan through the creation, restoration and enhancement of habitats? Will it increase the number or diversity of sites of nature conservation interest?	Biodiversity Flora & Fauna Soil Water Landscape
<b>10. Minimise the production of waste</b>	Will it minimise the amount of waste produced? Will it promote reuse, recycling and waste recovery?	Population Material Assets
<b>11. Improve air quality and reduce contributions to climate change.</b>	Will have an adverse effect on air quality, in particular AQMAS? Will it help minimise emissions of greenhouse gases? Will it increase the proportion of energy from renewable and sustainable resources? Will it reduce demand for energy and reduce the demand/need for energy?	Air Climatic factors
<b>12. Improve the quality of the built and natural environment.</b>	Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? Will it use land efficiently? Will it reduce the amount of derelict, degraded and underused land? Will it protect and enhance open space of amenity and recreational value? Will it improve the satisfaction of people with their neighbourhoods as places to live?	Flora & Fauna Material Assets Cultural Heritage Landscape

SA Objectives	Sub-objectives	SEA Theme
<b>13. Conserve and enhance cultural assets and the historic environment.</b>	Will it protect and enhance sites, features and areas of historical, archaeological and cultural value in both urban and rural areas? Will it improve areas of poor landscape quality?	Cultural Heritage Material Assets
<b>14. Improve water quality and protect water resources.</b>	Will it improve the quality of water bodies? Will it improve the hydromorphological (physical) quality of rivers? Will it reduce water consumption? Will it conserve ground water resources? Will it promote sustainable urban drainage? Will proposals that require abstraction cause changes in flows or levels of any water body in the vicinity of the site?	Water
<b>15. Avoid, reduce and manage flood risk.</b>	Will it minimise the risk to people and property from flooding, storm events or subsidence? Will it increase the risk of flooding?	Climatic Factors
<b>16. Reduce the effect of traffic on the environment.</b>	Will it encourage a modal shift to more sustainable forms of travel? Will it reduce traffic volumes? Will it reduce road traffic accidents? Will it reduce the effect of HGV traffic on people and environment? Will it provide easy access to the main highway network?	Population
<b>17. Facilitate indigenous, inward and regional investment.</b>	Will it encourage indigenous business development? Will it encourage inward investment? Will it make land and property available for business development? Will it provide for a variety of locations for businesses? Will it add to a ready supply of employment premises?	Population Material Assets

3.11 Undertaking the Sustainability Appraisal has involved appraising the options and policies against the SA Framework using the appraisal scoring system (see Table 3) which defines the impact on each objective as having a clear positive impact, some positive impact, a neutral or negligible impact, some negative impact or a clear negative impact. The appraisal scoring system also allows for the situation where the relationship between the two is unknown or there is insufficient information to make an assessment.

*Table 3: Sustainability Appraisal scoring system*

	Clear positive impact
	Some positive impact
	Neutral or negligible impact
	Some negative impact
	Clear negative impact
	Relationship unknown/insufficient information

- 3.12 The SA process tests the compatibility of the DPD objectives with the SA objectives to ensure that the objectives of the DPD are in accordance with sustainability principles. The Issues and Options Report set out five objectives for the DPD that detail in spatial planning terms what the DPD is aiming to achieve. The objectives are based on the issues identified in relation to site provision for gypsies and travellers and linked to the overall vision and objective for planning and housing within Havering's Core Strategy. The full findings of the assessment can be found in Appendix D.

## 4 Appraisal of Alternatives

4.1 In accordance with the SEA Directive this section outlines the methodology followed in appraising the Gypsy and Traveller Sites DPD. The SA process focuses on the consideration of alternatives. For the purposes of SA, the term ‘alternatives’ is considered to be synonymous with ‘options’. In line with the SEA Directive, reasonable alternatives (taking into account the objectives of the plan) must be identified, described and evaluated in the environmental assessment and an outline of the reasons for selecting the alternatives dealt with must be provided. Annex II of the SEA Directive sets out the criteria for determining the likely significance of effects.

### Developing the Options

4.2 The Issues and Options Report set out a series of options relating to the level and distribution of site allocations to be delivered by the DPD. The Council developed these options taking account of national, regional and local policy frameworks, statutory requirements, best practice guidance, and the results of the Gypsy and Traveller Accommodation Needs Assessment. Developing meaningful options is a key component of the SA process, and a necessary precursor to the assessment of effects. The options included in the Issues and Options Report are set out in Table 4.

Table 4: Gypsy and Traveller Sites DPD policy options

1A	Allocate land for a further 14 authorised pitches
1B	Allocate land for a further 34 authorised pitches
1C	Allocate land for a further 54 authorised pitches
2A	Additional pitches should be allowed within the nine sites where the existing pitches are located
2B	New locations should be considered for additional pitches
3A	Havering should not make provision for a transit site within the borough
3B	Havering should, in cooperation with neighbouring authorities, investigate the provision of transit sites within London

4.3 The SA process requires the prediction of the social, environment and economic effects of the options being considered in the development of the DPD and then, having identified and described the likely effects, to evaluate the significance of the effects.

4.4 Each of the options included in Table 4 was assessed against the SA objectives and the results are included in a summary matrix in Appendix E. The options assessment summary matrix provides an overview of the general performance of the options against the SA objectives and therefore acts as a visual summary of the whole SA, indicating which options perform well, where the most significant negative impacts result and identifying areas of uncertainty.

- 4.5 To support the summary matrix, Appendix F includes the appraisal tables for each option, which record the analysis of the environmental, social and economic effects and the significance of these effects. The prediction and evaluation of effects is a qualitative process based on professional judgement, taking into account all available information. The appraisal tables include commentary with the aim of highlighting the absolute strengths and weaknesses of each option.
- 4.6 Further detail on the options assessments and how these have been taken forward in the development of the policies and site allocations in the Proposed Submission Document is set out below.

### *Number of pitches*

- 4.7 Havering's 2010 Gypsy and Traveller needs assessment showed that there were 74 existing pitches at the time of the survey. 12 pitches had permanent permission, 48 had temporary permission or expired temporary permission and 14 pitches were unauthorised.
- 4.8 The Council's preferred option for meeting the housing needs of gypsies and travellers (Option 1A in the Issues and Options Report) was for 14 additional authorised pitches to be provided so that, taken together with the number of pitches which have or previously had permanent or temporary permission, the total number of authorised pitches would be sufficient to meet the needs of those households living in Havering at the time of the needs assessment. The report made clear however that not all the 48 pitches with temporary permission or expired temporary permission would necessarily be granted permanent planning permission and that this would be the subject of careful assessment on a case by case basis.
- 4.9 Option 1A performs well against the SA Framework with positive impacts on the majority of the social and environmental objectives and a neutral or negligible impact against the other objectives. In particular, the provision of new pitches will offer greater permanence for families those families living in Havering at the time of the needs study and increase access to services such as health, education and utilities. Against the environmental objectives, subject to full site assessments it may be possible provide the 14 additional pitches within existing sites and with no release of additional land. Given that all the existing sites are on Green Belt land - as are all the additional sites that have been put forward - Options 1B and 1C which would allocate land for a further 34 and 54 authorised pitches respectively have a negative impact against a number of the environmental objectives particularly as additional land would need to be identified to accommodate this number of pitches.
- 4.10 As such, Option 1A has been taken forward into the Proposed Submission Document. It strikes the right balance between meeting the priority housing needs of gypsies and travellers – by permitting a sufficient number of pitches to accommodate all the households living in Havering at the time of the needs survey – and only allowing Green Belt land where this is justified by 'very special circumstances'. The allocation of additional Green Belt land to accommodate future demand resulting from household formation is not justified as 'very special circumstances'.

### *Distribution of sites*

- 4.11 The needs assessment identified that gypsy and traveller pitches were concentrated in nine sites (areas) within the Green Belt. It also showed that gypsies and travellers wanted to continue living the local area where they were currently residing. Option 2A

was to continue this pattern for additional pitches, whereas Option 2B would consider new locations for the additional pitches.

- 4.12 Option 2A performs well against the social objectives of the SA Framework with a number of positive impacts being identified including the provision of decent homes and access to services, particularly with established connections to local health and education services. Likewise, a number of positive impacts were identified against the environmental objectives, with no additional land being required for sites and the opportunity to enhance and improve existing sites through site design and layout standards.
- 4.13 There was insufficient information to undertake a detailed assessment of Option 2B as no specific sites were being assessed at this stage of the plan process. However, this option could have a negative impact against some of the social and environmental objectives of the SA Framework. New locations may be away from existing sites and impact upon the preference for family connections, additional land is required to be identified and additional sites may lead to an increased level of travel between sites which could have environmental implications.
- 4.14 The sites put forward during the plan preparation have been assessed against the SA Framework criteria (see Section 5 and Appendix G of this report). In conjunction with this, and as set out in the Issues and Options Report, a three tier site assessment methodology has also been used to determine the suitability of these sites to be allocated for permanent gypsy and traveller pitches<sup>1</sup>. A full report on the site assessments has been published as a Technical Report to the Proposed Submission Document and this Final SA.

### *Provision of transit site*

- 4.15 The needs assessment did not show that there was a local need in the Borough for a transit site and a preference was shown for smaller self-owned family sites. Option 3A was to have no transit site in Havering, whereas Option 3B was to provide a transit site in Havering if further investigation shows that it would meet a London-wide need.
- 4.16 Option 3A had a neutral impact in the SA assessment as there would be no change to the current situation. There was insufficient information available to undertake a detailed assessment of Option 3B as no need for a transit site has been identified. However, this option could have a negative impact against some of the environmental objectives in the SA Framework with additional land likely to be required for a transit site and the potential for greater localised transport movements.

---

<sup>1</sup> Site assessments have been based on a methodology devised by CDN Planning (Wales) Ltd. [www.cdnplanning.com](http://www.cdnplanning.com)

## 5 Appraisal of Policies and Site Allocations

- 5.1 The Gypsy and Traveller Sites DPD Proposed Submission Document comprises one policy and 15 site allocations:
- GTS1: Provision of Permanent Gypsy and Traveller Pitches
  - GTS2: Church Road
  - GTS3: Church Road
  - GTS4: Maricot Bungalow, Church Road
  - GTS5: Benskins Lane
  - GTS6: Hogbar Farm West
  - GTS7: Hogbar Farm
  - GTS8: Fairhill Rise
  - GTS9: Vinegar Hill
  - GTS10: Land between 66-72 Lower Bedfords Road
  - GTS11: Tyas Stud Farm
  - GTS12: Laburnham Stables
  - GTS13: Ashlea View
  - GTS14: Willoughby Drive
  - GTS15: Clemlev, Willoughby Drive
  - GTS16: Willoughby Drive
- 5.2 Each of these, together with additional sites that were put forward for consideration during consultation on the emerging DPD, was appraised against the Sustainability Objectives and SA Framework. The findings of the appraisals are set out below and in Appendix G.

### Policy and Site Appraisals

#### *Policy GTS1: Provision of Permanent Gypsy and Traveller Pitches*

- 5.3 Policy GTS1 seeks to ensure that gypsies and travellers who were living in Havering at the time of the Issues and Options Report have the opportunity to occupy, with permanent planning permission, pitches on sites in the borough. The policy identifies 17 pitches to meet the identified priority need for additional gypsy and traveller accommodation in Havering; 14 to achieve the Council's preferred option for the number of pitches and three to compensate for not making the pitches on the Maylands and Prospect Road sites permanent (see paragraphs 5.25 – 5.28 below). In addition, 45 existing pitches on sites which have, or have previously had, temporary planning permission have been identified as suitable for gypsy and traveller accommodation subject to planning permission.
- 5.4 The policy performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against the other objectives, including the economic objective. No negative impacts are predicted from pitch provision at the level set out in the policy. The policy should ensure that the identified priority need for additional Gypsy and Traveller accommodation in Havering is met while only allocating Green Belt land where this is

justified by 'very special circumstances'. All of the sites being taken forward in Policies GTS2 – GTS16 are on Green Belt land.

*Policy GTS2: Church Road*

- 5.5 These four sites (CR7-CR10) form a compact, well contained grouping adjacent to Mariecot Bungalow to the north (see GTS4 below) and each have temporary permission for one pitch. The sites perform well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS2 allocates each of the four sites for one pitch.

*Policy GTS3: Church Road*

- 5.6 These two sites (CR6 and CR11) are unauthorised with a single pitch on each. The sites are adjacent and to the south of the four sites above and together with these can form a well contained grouping of pitches. The sites perform well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS3 allocates both of these sites for one pitch.

*Policy GTS4: Mariecot Bungalow, Church Road*

- 5.7 This site, comprising a bungalow and garden, was put forward during the Issues and Options consultation and is currently in residential use. The site is situated to the north of the four sites (CR7-CR10) identified above in Policy GT2. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives.
- 5.8 The site is well screened and development here would have less of a visual impact than the unauthorised sites (CR5 and CR12) situated at the southern end of the area towards Church Road. Policy GTS4 allocates this site for six pitches which could accommodate the families on the two unauthorised sites above and allow them to remain in the immediate vicinity of their current sites.

*Policy GTS5: Benskins Lane*

- 5.9 The six adjoining sites on Benskins Lane (BL1 – BL6) each have temporary permission for two pitches. The sites lie at the northern end of Benskins Lane and are bordered on the northern side by the embankment of the M25 motorway. An area of established dense woodland lies to the west of the sites and alongside the motorway embankment. The sites previously comprised part of this woodland which was cleared to facilitate development of the sites
- 5.10 The sites perform well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. However, mitigation measures including contributions towards the restoration and improvement of woodland in adjacent areas and edge landscaping of the sites are proposed in the site specific policy to ensure environmental improvements to the area.
- 5.11 Policy GTS5 allocates each of the six sites at Benskins Lane for two pitches.

*Policy GTS6: Hogbar Farm West*

- 5.12 This site (LB1) has three pitches and is situated at the western end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road. It has previously had temporary permission for three pitches. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS6 allocates this site for three pitches.

*Policy GTS7: Hogbar Farm*

- 5.13 This site (LB2) has temporary permission for eight pitches and is one of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road. The site is to the east of Hogbar Farm West and performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS7 allocates this site for eight pitches.

*Policy GTS8: Fairhill Rise*

- 5.14 This site (LB3) has temporary permission for three pitches and is the third of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS8 allocates this site for three pitches.

*Policy GTS9: Vinegar Hill*

- 5.15 This site (LB4) has previously had temporary permission for six pitches. It currently has 12 pitches without permission. Two of the pitches were occupied by families from the settled community at the time of the call for sites. The site is at the eastern end of four adjacent gypsy and traveller sites that lie along the southern side of Lower Bedfords Road, immediately to the west of Straight Road.
- 5.16 The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. The site is well laid and out and maintained and has the capacity to accommodate an additional pitch making 13 in total. This, in addition to the two pitches occupied by non-traveller families at the time of the call for sites, would accommodate the three pitches required as a result of the Maylands and Prospect Road site pitches being unacceptable. Policy GTS9 allocates this site for 13 pitches.

*Policy GTS10: Land between 66-72 Lower Bedfords Road*

- 5.17 This site (LB5) contains a single unauthorised pitch. The site is situated among other well established residential properties and is well maintained and screened. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS10 allocates this site for one pitch.

*Policy GTS11: Tyas Stud Farm*

- 5.18 This site (UP1) has temporary permission for one pitch and a stable block with permission. The caravans and stables are located at the southern end of the site. The remainder of the land is given over to paddocks. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS11 allocates this site for one pitch.

*Policy GTS12: Laburnham Stables*

- 5.19 This site (UP2) has temporary permission for three pitches and a stable block with permission. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS12 allocates this site for three pitches.

*Policy GTS13: Ashlea View*

- 5.20 This site (UP3) has temporary permission for three pitches. It has had a number of temporary permissions since 1998 and has been occupied by the same family throughout this time. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS13 allocates this site for three pitches.

*Policy GTS14: Willoughby Drive*

- 5.21 This site (WD1) contains a single unauthorised pitch and is located next to two other sites with temporary permission and to the west of a row of terraced houses on the northern side of Willoughby Drive. The area's contribution to the Green Belt is limited by other uses within the area, including a waste transfer facility. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS14 allocates this site for one pitch.

*Policy GTS15: Clemlev, Willoughby Drive*

- 5.22 This site (WD3) has temporary permission for one pitch and is one of three gypsy and traveller sites adjacent to each other on Willoughby Drive. The site comprises a stable yard and a sand paddock with the residential accommodation at the eastern end. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS15 allocates this site for one pitch.

*Policy GTS16: Willoughby Drive*

- 5.23 This site (WD4) has temporary permission for one pitch and lies at the western end of the three sites on Willoughby Drive. The site performs well against the social and environmental objectives of the SA Framework with positive impacts on a majority of objectives and neutral or negligible impacts against other objectives. Policy GTS16 allocates this site for one pitch.

### Discounted Site Appraisals

- 5.24 Following appraisal against the Sustainability Objectives and SA Framework a number of existing sites with temporary permission and unauthorised sites have been discounted for allocation in the Proposed Submission Document. A number of additional sites at Church Road, Willoughby Drive and Brookmans Park Drive were also put forward during consultation on the emerging DPD and were subject to the same appraisal process. These sites have also been discounted for allocation in the Proposed Submission Document. All of the discounted sites are in the Green Belt.

#### *Existing sites*

##### *Maylands*

- 5.25 This site (MY1) has a temporary permission until 2016 for two pitches. The site is situated just off the A12 (Colchester Road) and was previously a service station. The site has a number of negative impacts against the environmental objectives of the SA Framework, particularly with regard to biodiversity, the built and natural environment, flood risk and the effect of traffic and is not being taken forward into the Proposed Submission Document.
- 5.26 Additional capacity has been identified at the Vinegar Hill site (Policy GTS9) to accommodate the two pitches required as a result of this site not being taken forward into the Proposed Submission Document.

##### *Prospect Road*

- 5.27 This site (HC1) has a temporary permission until 2013 for one pitch. The site is located on the unmade part of Prospect Road and within a Borough Site of Importance for Nature Conservation (SINC). The site has negative impacts against the environmental objectives of the SA Framework, specifically with regard to biodiversity and the built and natural environment.
- 5.28 This site is not being taken forward into the Proposed Submission Document due to these negative impacts and specifically due to planning issues associated with its location within a Borough SINC and it being visually intrusive within the Green Belt. Additional capacity has been identified at the Vinegar Hill site (Policy GTS9) to accommodate the single pitch required as a result of this site not being taken forward into the Proposed Submission Document.

##### *Church Road*

- 5.29 Two other sites at Church Road (CR5 and CR12) are unauthorised and have one pitch and five pitches respectively. These are situated at the southern end of the group of sites in this area and are closest to Church Road. The sites have negative impacts against the environmental objectives of the SA Framework, specifically with regard to biodiversity and the built and natural environment. Both have been refused permission on appeal primarily because the Inspector considered the substantial identifiable harm to the openness of the Green Belt and their visibility from Church Road.
- 5.30 The sites are not being taken forward in the Proposed Submission Document. However, the land at the existing Mariecot Bungalow (see paragraphs 5.7 – 5.8 above) has been put forward in the Proposed Submission Document for six pitches which could accommodate the families and allow them to remain in the immediate vicinity of their current sites.

*Additional sites put forward*

*Church Road*

- 5.31 Five additional sites at Church Road (CR1-CR4 and CR13) were put forward for future pitch provision during the Call for Sites. All sites are open land in the Green Belt at the southern end of the group of occupied sites in this area towards Church Road. Sites CR1-CR4 were put forward for a single pitch on each and three new pitches were proposed on site CR13. The sites all have negative impacts against the environmental objectives of the SA Framework, specifically with regard to biodiversity and the built and natural environment and the allocation of additional Green Belt land.
- 5.32 Green Belt land has only been allocated for gypsy and traveller sites where this is justified by 'very special circumstances' and in order to meet the identified priority need for additional Gypsy and Traveller accommodation in Havering. It is not considered that the release of Green Belt land now to accommodate future demand resulting from household formation could be justified as 'very special circumstances'.

*Willoughby Drive*

- 5.33 An additional site at Willoughby Drive (WD2) was put forward for future pitch provision during the Call for Sites. The site is open land in the Green Belt situated on the south of Willoughby Drive and was put forward for a single pitch. The site has negative impacts against the environmental objectives of the SA Framework, specifically with regard to biodiversity and the built and natural environment and the allocation of additional Green Belt land.
- 5.34 As noted in paragraph 5.32, it is not considered that the release of Green Belt land now to accommodate future demand resulting from household formation could be justified as 'very special circumstances'.

*Brookmans Park Drive*

- 5.35 This site was put forward during the Issues and Options consultation. The site is open land in the Green Belt and located between the northern edge of Cranham and the A127 Southend Arterial Road. It is linked to Front Lane, which joins the A127 to the east, by a narrow private road and situated to the rear of a permanent site with permission for two pitches. The site was put forward for 15-20 pitches. The site has negative impacts against the environmental objectives of the SA Framework, specifically with regard to biodiversity and the built and natural environment and the allocation of additional Green Belt land. In addition, the proposed scale of pitch provision would have negative impacts on traffic and waste.
- 5.36 As noted in paragraph 5.32, it is not considered that the release of Green Belt land now to accommodate future demand resulting from household formation could be justified as 'very special circumstances'.

## 6 Mitigation and Monitoring

### Mitigation

- 6.1 The purpose of this part of the process is to consider the need for any measures to help mitigate the adverse effects of the DPD and to amplify the predicted positive effects. No **significant** negative effects were identified as arising from the implementation of Policy GTS1 and the site allocations (Policies GTS2-GTS16).
- 6.2 Some potentially negative impacts relating to biodiversity and the built and natural environment can be mitigated against through site design and layout guidance, specific criteria set out for individual sites in the DPD policies and planning conditions if / when planning permission is granted. In particular, policies for the Benskins Lane (GTS5) and Lower Bedfords Road sites (GTS6-GTS9) include specific criteria to ensure that any potentially negative impacts of allowing development are mitigated against.

### Monitoring

- 6.3 To ensure that the predicted benefits are delivered, it will be necessary to monitor the performance of the Gypsy and Traveller Sites DPD. All of the Council's LDF policies are monitored through the Annual Monitoring Report, the purpose of which is to assess and review the extent to which policies are being implemented. Provision of gypsy and traveller pitches is currently monitored under Core Policy CP2 (Sustainable Communities):
- Net additional pitches granted permanent permission
- 6.4 One of the key objectives of the Gypsy and Traveller Sites DPD is to reduce the level of unauthorised development within the borough, therefore an additional indicator is proposed to be added to the annual monitoring framework:
- Number and size of unauthorised developments
- 6.5 Where, as a result of monitoring, indicators show that a policy is not working or that key targets are not being met, remedial action may be taken or it may give rise to a review of that policy document.

## Appendices

### Appendix A: Statement on compliance with the SEA Directive and Regulations

Environmental Report Requirements	Section of Report
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans	Sections 1 and 3
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Scoping Report and Section 3
(c) the environmental characteristics of areas likely to be significantly affected	Scoping Report and Section 3
(d) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	Scoping Report and Section 3
(e) the environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Scoping Report and Section 3
(f) the likely significant effects 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 4
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	Section 5
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 4
(i) a description of the measures envisaged concerning monitoring	Section 6
(j) a non-technical summary of the information provided under the above headings	Section 1

## Appendix B: Consultation Responses

### Scoping Report (September 2010)

Respondent	Summary of comments	Council response
English Heritage	We are pleased to see that the historic environment is identified as a potential issue in regard of selection of sites for Gypsies and Travellers on page 9, and that PPS5 is referred to as a source for this consideration within the review of plans on page 17. For completeness we suggest that the Historic Environment Planning Practice Guide, which accompanies PPS5, and the Government's Statement on the Historic Environment for England (2010) are also referred to.	Historic Environment Planning Practice Guide and Statement on Historic Environment for England included in policy review.
Environment Agency	<u>Flood Risk</u> We are pleased to see that Planning Policy Statement 25 (PPS25) has been referred to within the document (page 3 and Appendix A). The document also highlights the classification of caravans and mobile homes as being Highly Vulnerable (PPS25, Table D2) and confirms the areas where development of this type is appropriate (PPS25, Table D3). We would like to remind Havering that any sites proposed to be located within flood risk areas (flood zones 2 & 3) will need to be Sequentially Tested within the Site Allocations DPD. Reference should also be made to the Havering Strategic Flood Risk Assessment (SFRA) under the 'Local Documents'	Havering SFRA included in policy review.
Environment Agency	<u>Water Resources</u> Point 14 on table 4 should read 'water resources', not 'waster resources'. In addition we recommend there is a differentiation between the physical improvements (hydromorphological) and water quality improvements to a river. In addition any proposals that require abstraction must assess any adverse changes in flows or levels in any river, stream, ditches, springs, lakes or ponds in the vicinity of the site.	Sub-objective of SA Objective 14 modified to include recommendations.
Environment Agency	<u>Ecological Enhancement</u> Appendix 1 refers to Planning Policy Statement 9 (PPS9) which we support. In addition to protecting designated sites and sites contributing to biodiversity conservation, there should be an emphasis on protecting and enhancing important wildlife corridors and connecting habitats.	Implications for SA of PPS9 amended as recommended.
Environment Agency	<u>Additional Documents</u> We recommend the following additional documents should be referred to in the documents: <ul style="list-style-type: none"> <li>• Thames Estuary 2100 Study (TE2100)</li> <li>• Thames Region Catchment Flood Management Plan</li> </ul>	Thames Estuary 2100 Plan documents included in policy review.
Natural England	Under the PPS 9 Section (page 19) we would recommend that a sentence be included stating that proposals will not have an adverse effect on national sites, regional or local sites e.g. Sites of Special Scientific Interest and Sites of Importance for Nature Conservation.	Implications for SA of PPS9 amended as recommended.

London Thames Gateway Development Corporation	<p>There are a number of documents that might be of relevance to include in the local policy review:</p> <ul style="list-style-type: none"> <li>• LTGDC Vision for London Riverside</li> <li>• London Riverside Conservation Park – Wildspace for a World City</li> <li>• SFRA prepared by LBH</li> <li>• London Riverside OAPF (draft available February 2011)</li> <li>• Major hazard pipelines study (in preparation)</li> </ul>	<p>Comments noted. Havering SFRA included in policy review. Other suggested documents of limited relevance to Gypsy and Traveller Site Allocations so not included in policy review.</p>
London Borough of Redbridge	<p>You may be aware of the Mayor's intention to publish further Gypsy and Traveller Policy Minor Alterations in September, which will set out a different policy approach to enable boroughs and stakeholders to meet the required needs in light of local circumstances, including the removal of targets. Therefore, the Sustainability Appraisal Scoping Report Baseline Data and relevant policies, plans, programmes and strategies should be updated in accordance with any proposed London Plan policy alterations. If the requirement set in the March 2010 Minor Alteration for travelling show people pitches to be distributed through sub regional housing partnerships is retained, then the Sustainability Scoping Report should also acknowledge that this may be an additional requirement for the London Borough of Havering.</p>	<p>Comment noted. October 2010 Minor Alteration removes the requirement to distribute pitches for travelling show people through sub-regional housing partnerships.</p>

#### Interim Sustainability Appraisal (June 2011)

Respondent	Summary of Comments	Council response
Natural England	<p><u>Table 1: Summary of identified sustainability issues</u></p> <p>The environmental issues referenced under sections G, H and I are acknowledged and welcomed.</p>	<p>Support welcomed.</p>
Natural England	<p><u>Appendix C – Sustainability Appraisal Framework</u></p> <p>The 17 objectives referenced here are broadly supported, especially:</p> <ul style="list-style-type: none"> <li>9) Maintain and enhance biodiversity</li> <li>11) Improve air quality and reduce contributions to climate change</li> <li>12) Improve the quality of the built and natural environment</li> </ul> <p>Overall the approach and methodology used are appropriate and in line with the advice that would be offered by Natural England. The topics and issues covered are also in line with those that Natural England would wish to see considered in such a document.</p>	<p>Support welcomed.</p>

## Appendix C: Relevant Plans, Policies, Programmes and Strategies<sup>2</sup>

### International and European:

- Johannesburg Declaration on Sustainable Development (2002)
- Directive 2002/49/EC of the European Parliament on Environmental Noise
- Directive 2008/50/EC of the European Parliament on Ambient Air Quality
- Water Framework Directive 2000/60/EC of the European Parliament & amending acts

### National:

- Securing the Future – The UK Government Sustainable Development Strategy (DEFRA 2005)
- PPS1: Delivering Sustainable Development, and PPS Planning and Climate Change: Supplement to PPS1
- PPS3: Housing
- PPS5: Planning for the Historic Environment and accompanying guidance
- PPS9: Biodiversity and Geological Conservation
- PPS12: Local Spatial Planning
- PPS25: Development and Flood Risk
- PPG2: Green Belts
- PPG13: Transport
- ODPM Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites
- CLG Circular 04/2007: Planning for Travelling Showpeople
- Designing Gypsy and Traveller Sites: Good Practice Guide (CLG 2008)
- Planning and Compulsory Purchase Act 2004
- Housing Act 2004
- Race Relations Act 1976 and Race Relations (Amendment) Act 2000

### London:

- The London Plan: Spatial Development Strategy for Greater London (Consolidated with Alterations, 2008; Consultation Draft Replacement Plan, October 2009; and Minor Alteration to Policy 3.9, March 2010)
- The Mayor's Biodiversity Strategy (2002)
- London Boroughs' Gypsy and Traveller Needs Assessment (2008)
- Thames Estuary 2100 Plan

### Local:

- LBH Core Strategy & Development Control Policies (2008)
- LBH Sustainable Community Strategy 2008-2013
- LBH Housing Strategy 2010-2012
- LBH Traveller Needs Assessment (2004)
- LBH Strategic Flood Risk Assessment (2007)

---

<sup>2</sup> As at October 2010 and as set out in the Final Scoping Report

## Appendix D: DPD Objectives Assessment Table

### Proposed objectives for the Gypsy and Traveller Sites DPD:

1. To support the removal of unauthorised development in the borough, and strengthen the Council's ability to take enforcement action against unauthorised sites.
2. To allocate sufficient suitable sites to meet the needs of Gypsies and Travellers living in Havering, as determined by the 2010 Havering GTAA.
3. To protect the Green Belt from inappropriate development, except in very special circumstances.
4. To set out a clear delivery strategy for the allocated sites that identifies how much development will happen, where, when and by whom it will be delivered.
5. To provide specific criteria about the form of development which will be allowed on each site to ensure the land use is appropriate within the constraints of the local area.

Sustainability Appraisal Objectives		Remove unauthorised sites	Sufficient sites	Protect Green Belt	Delivery	Criteria	Additional comments
<b>SOCIAL</b>							
1.	Provide everyone with the opportunity to live in an affordable, decent home						
2.	Improve accessibility to essential services, facilities and the workplace						Slight positive on delivery because transport improvements can be linked to site delivery timing
3.	Offer everyone the opportunity for rewarding, well-located and satisfying employment						
4.	Reduce poverty, inequality and social inclusion						Delivery strategy is necessary to ensure that the benefits of authorised sites are realistically achievable
5.	Improve lifelong learning, skills and education						Improved access to education
6.	Improve the health of the population						

Sustainability Appraisal Objectives		Remove unauthorised sites	Sufficient sites	Protect Green Belt	Delivery	Criteria	Additional comments
7.	Reduce crime, the fear of crime and increase community safety						
8.	Foster community identity and participation						Sense of place, criteria to protect land improves ethnic relations
<b>ENVIRONMENT</b>							
9.	Maintain and enhance biodiversity						Stop inappropriate development in the Green Belt except in exceptional circumstances
10.	Minimise the production of waste						
11.	Improve air quality and reduce contributions to climate change						
12.	Improve the quality of the built and natural environment						Stop inappropriate development in the Green Belt except in exceptional circumstances. Criteria for site design and layout
13.	Conserve and enhance cultural assets and the historic environment						
14.	Improve water quality and protect water resources						
15.	Avoid, reduce and manage flood risk						
16.	Reduce the effect of traffic on the environment						
<b>ECONOMIC</b>							
17.	Facilitate indigenous, inward and regional investment						

## Appendix E: Options Assessment Summary Matrix

	Decent homes	Accessibility to services	Employment	Reduce social exclusion	Lifelong learning	Improve health	Community safety	Community identity	Biodiversity	Minimise waste	Climate change	Built & natural environment	Historic environment	Water resources	Flood risk	Effect of traffic	Facilitate investment
Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
1A: 14 authorised pitches	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Yellow	Yellow	Green	Green	Yellow	Green	Yellow	Yellow
1B: 34 authorised pitches	Green	Orange	Yellow	Green	Green	Green	Yellow	Green	Orange	Yellow	Yellow	Orange	Orange	Yellow	Green	Yellow	Yellow
1C: 54 authorised pitches	Green	Orange	Yellow	Green	Green	Green	Yellow	Green	Orange	Yellow	Yellow	Orange	Orange	Yellow	Green	Yellow	Yellow
2A: Allocations within existing sites	Green	Green	Yellow	Yellow	Green	Green	Yellow	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Yellow	Yellow
2B: Allocations in new locations	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey
3A: No transit site	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
3B: Investigate transit site	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey	Grey

## Appendix F: Options Assessment Summary Tables

<b>Issue:</b> Number of Pitches		
<b>Assumptions:</b> (if applicable)		
<b>Option 1A: Allocate 14 additional pitches</b>	<b>Option 1B: Allocate 34 additional pitches</b>	<b>Option 1C: Allocate 54 additional pitches</b>
<p><b>Social</b></p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and increase access to services such as health, education and utilities.</p> <p>Sufficient to meet the needs of the gypsy and traveller households who were living in Havering at the time of the needs assessment.</p>	<p><b>Social</b></p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and increase access to services such as health, education and utilities.</p> <p>Could lead to increased pressure on infrastructure and other public services.</p>	<p><b>Social</b></p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and increase access to services such as health, education and utilities</p> <p>Could lead to increased pressure on infrastructure and other public services.</p>
<p><b>Environmental</b></p> <p>Can be achieved within existing sites and no release of additional land. Only allocate Green Belt land where justified by very special circumstances.</p> <p>Site assessment criteria and site design and layout have a positive impact on environmental impact.</p> <p>The location of pitches may have a greater environmental impact rather than the number of pitches.</p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and may reduce movement between unauthorised sites.</p>	<p><b>Environmental</b></p> <p>Would require additional land, including Green Belt land and / or intensification of existing sites. Not very special circumstances for use of Green Belt land.</p> <p>Site assessment criteria and site design and layout could mitigate against some detrimental effects on environmental impact.</p> <p>The location of pitches may have a greater environmental impact rather than the number of pitches.</p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and may reduce movement between unauthorised sites.</p>	<p><b>Environmental</b></p> <p>Would require additional land, including Green Belt land and / or intensification of existing sites. Not very special circumstances for use of Green Belt land.</p> <p>Site assessment criteria and site design and layout could mitigate against some detrimental effects on environmental impact.</p> <p>The location of pitches may have a greater environmental impact rather than the number of pitches</p> <p>The provision of new pitches will offer greater permanence for gypsy and travellers and may reduce movement between unauthorised sites.</p>
<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>	<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>	<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>

<b>Issue:</b> Distribution of Sites	
<b>Assumptions:</b> (if applicable)	
<b>Option 2A: Allocations within existing sites</b>	<b>Option 2B: Allocations in new locations</b>
<p><b>Social</b></p> <p>Havering's Needs Assessment showed that gypsies and travellers wanted live in local area / where they are now and retain family connections.</p> <p>Existing sites have established connections with services particularly access to schools through Traveller Education Service.</p>	<p><b>Social</b></p> <p>New locations may be away from existing sites and impact upon preference for family connections.</p> <p>Could lead to increased pressure on infrastructure and other public services in those areas.</p> <p>Access to services to be considered in line with site assessment criteria.</p>
<p><b>Environmental</b></p> <p>No additional land required.</p> <p>Opportunity to enhance and improve existing sites through site assessment criteria and site design and layout standards.</p>	<p><b>Environmental</b></p> <p>Additional land required.</p> <p>Site assessment criteria and site design and layout standards could mitigate against detrimental effects on environmental impact.</p> <p>New sites distributed across the borough may have an increased level of travel between sites which could have implications for pollutant levels.</p>
<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>	<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>

<b>Issue:</b> Provision of transit site	
<b>Assumptions:</b> (if applicable)	
<b>Option 3A: No provision of transit site</b>	<b>Option 3B: Investigate provision of transit site</b>
<p><b>Social</b></p> <p>Havering's Needs Assessment did not show that there was a local need in the borough for a transit site.</p> <p>Preference shown for smaller self-owned family sites.</p>	<p><b>Social</b></p> <p>Provision of transit sites to be considered at sub-regional level.</p>
<p><b>Environmental</b></p> <p>No additional land required.</p> <p>Transit sites could generate greater localised transport movements and have a negative environmental impact.</p>	<p><b>Environmental</b></p> <p>Additional land required.</p> <p>Transit sites could generate greater localised transport movements and have a negative environmental impact.</p>
<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>	<p><b>Economic</b></p> <p>Unlikely to have a significant effect on the economic objectives.</p>

## Appendix G: Policy and Sites Assessment Summary Matrix

### Policy GTS1: Provision of Permanent Gypsy and Traveller Pitches

The Council has identified sites for 17 pitches to meet the identified priority need for additional Gypsy and Traveller accommodation in Havering. In addition, 45 existing pitches on sites which have, or have previously had, temporary planning permission have been identified as suitable for Gypsy and Traveller accommodation subject to planning permission.

Up to December 2015 planning permission will only be granted to Gypsies and Travellers who were resident in Havering at the time of the Issues and Options Report consultation in June 2011.

All planning applications for Gypsy and Traveller sites will be considered against Policy DC8 and other relevant policies in Havering's Core Strategy and Development Control Policies DPD. Additionally, the government good practice guidance on Designing Gypsy and Traveller Sites should be reflected in all planning applications.

Business uses will not be allowed on Green Belt sites except for stables where planning permission has previously been granted.

Site specific criteria are set out in the individual site allocation policies in this DPD.

SA Objective		Comments	Impact
1	<b>Decent homes</b>	The Council has a responsibility to plan for the housing needs of all residents, including the gypsy and traveller community. The policy will have a positive impact and ensure that permanent pitches are available to meet the culturally specific needs of gypsy and traveller families living in Havering.	
2	<b>Accessibility to services</b>	The provision of permanent pitches will have a positive impact on access to essential services and facilities.	
3	<b>Employment</b>	The provision of gypsy and traveller sites will not have a direct impact on employment opportunities and reducing unemployment.	
4	<b>Reducing social exclusion</b>	The provision of permanent pitches will provide certainty and stability for families and should help to reduce the social exclusion of the gypsy and traveller community.	

SA Objective		Comments	Impact
5	<b>Lifelong learning</b>	The provision of permanent pitches should ensure improved access to education - particularly in conjunction with the Traveller Education Service - and the potential to improve qualifications, skills and training opportunities within the gypsy and traveller community.	
6	<b>Improve health</b>	The policy will have a positive impact on the general health and well-being of the gypsy and traveller community. The lack of suitable sites and uncertainty over the status of temporary or unauthorised sites can have a negative impact on health and well-being within the gypsy and traveller community.	
7	<b>Community safety</b>	Fear of crime can be associated with gypsy and traveller sites but the provision of permanent and legal sites may help to dispel this. The policy should ensure the reduction in unauthorised sites which can have more of a negative impact in terms of the fear of crime and community safety issues.	
8	<b>Community identity</b>	The provision of permanent gypsy and traveller pitches in the borough on sites where families wish to live, and in many cases are well established, will have a positive impact on fostering community identity and participation. The allocation of permanent pitches will reduce the incidences of unauthorised sites and the social tensions that these can cause.	
9	<b>Biodiversity</b>	Details of boundary treatments and landscaping will be required for all sites. Site specific landscaping criteria have been identified where appropriate in individual site policies	
10	<b>Minimise waste</b>	Waste considerations are not addressed in this policy but will be considered in individual site applications. The provision of permanent sites should ensure that regular waste collections, including recycling, take place.	
11	<b>Climate change</b>	The impact on climate change will be influenced by the location and scale of individual sites.	
12	<b>Built &amp; natural environment</b>	The provision of permanent sites will have a positive impact on the quality of the natural environment in particular by discouraging unauthorised sites being established in the Green Belt and other areas of open space. The removal of ancillary equipment and structures not part of the residential accommodation will be required unless otherwise stated in site specific policies.	
13	<b>Historic environment</b>	None of the proposed sites are located in a designated historic environment.	
14	<b>Water resources</b>	Details of foul sewerage disposal and surface water drainage will be required in any proposals for development on the individual sites identified in the DPD.	
15	<b>Flood risk</b>	None of the proposed pitches are on sites within a Flood Risk zone.	
16	<b>Effect of traffic</b>	The impact of the pitches will be dependent on the site location. The provision of permanent sites may reduce the need for longer distance travelling and travelling between unauthorised sites.	
17	<b>Facilitate investment</b>	The provision of gypsy and traveller sites will not have an impact on investment in the borough.	

	Decent homes	Accessibility to services	Employment	Reduce social exclusion	Lifelong learning	Improve health	Community safety	Community identity	Biodiversity	Minimise waste	Climate change	Built & natural environment	Historic environment	Water resources	Flood risk	Effect of traffic	Facilitate investment
Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Church Road (CR1)																	
CR2																	
CR3																	
CR4																	
CR5																	
CR6																	
CR7																	
CR8																	
CR9																	
CR10																	
CR11																	
CR12																	
CR13																	
Benskins Lane (BL1)																	
BL2																	
BL3																	
BL4																	
BL5																	
BL6																	

	Decent homes	Accessibility to services	Employment	Reduce social exclusion	Lifelong learning	Improve health	Community safety	Community identity	Biodiversity	Minimise waste	Climate change	Built & natural environment	Historic environment	Water resources	Flood risk	Effect of traffic	Facilitate investment
Lower Bedfords Road (LB1)																	
LB2																	
LB3																	
LB4																	
LB5																	
Upminster (UP1)																	
UP2																	
UP3																	
Willoughby Drive (WD1)																	
WD2																	
WD3																	
WD4																	
Maylands (MY1)																	
Prospect Road (HC1)																	
Brookmans Park Drive																	
Mariecot Bungalow																	