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Herefordshire Travellers' Sites DPD: Main Modifications

Sustainability Appraisal and Habitats Regulations Assessment Second Addendum

Final Report Prepared by LUC May 2019



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Second Sustainability Appraisal and Habitats Regulations Assessment Addendum

Client: Herefordshire Council

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SAHRA of the Main Modifications to the Herefordshire Travellers' DPD

Project Code: 4939

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1 Introduction

Introduction

- On 27th February 2018 Herefordshire Council (referred to hereafter as 'the Council') submitted the Herefordshire Travellers' Sites DPD Pre-Submission Publication (November 2017) (referred to hereafter as 'the Travellers' Sites DPD') for independent examination by a Planning Inspector appointed by the Secretary of State for Housing, Communities and Local Government. An integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) report (referred to hereafter as 'the SA Report') entitled 'Sustainability Appraisal of the Herefordshire Travellers' Sites Development Plan Document Pre-Submission Publication' (November 2017) and a Habitats Regulations Assessment (HRA) report entitled 'Habitats Regulations Assessment of the Herefordshire Travellers' Sites Development Plan Document Pre-Submission Publication' (November 2017) were submitted alongside the DPD.
- 1.2 The first examination hearing for the Travellers' Sites DPD took place on 22nd May 2018. Following the conclusion of the hearing, the Inspector issued closing comments and post hearing advice. The Inspector concluded that the Travellers' Sites DPD failed to identify a supply of specific deliverable sites sufficient to provide five years' worth of sites from 2018 against locally set targets. Given that there is an immediate need and that providing for an adequate supply is a fundamental aim of Government policy, the Inspector advised that the Travellers' Sites DPD is not sound as it stands. To remedy this, the Inspector advised the Council to investigate ways to increase supply by at least five deliverable pitches to ensure a five year supply on adoption of the Travellers' Sites DPD. Overall, a further five pitches are required in the county before 2022/23 and a further 11 pitches between 2023 and 2031. This is in addition to the nine residential pitches at four different sites¹ and one temporary stopping place for five pitches² already identified in the Travellers' Sites DPD.
- 1.3 Herefordshire Council provided the Inspector with a report outlining the possible approaches to identifying the additional pitches³. The Council's proposed approach was to assess the potential for additional pitches on an existing private site identified through the Gypsy and Travelling Showperson Accommodation Assessment Update 2017 (July 2017). In addition, the Council received a proposal for additional pitches at another site in the county. It was considered that the potential supply from these two sites could achieve the requirement for the five year supply of pitches. Therefore, the two additional sites at 'Land at Stoney Street, Madley' and 'Land at Oakfield, Nashend Lane, Bosbury' were subject to assessment in the SA Addendum Report (October 2018) and the HRA Addendum Report (October 2018). The first SA and HRA Addendum Reports relate only to assessing these two additional sites.
- 1.4 A second hearing on 18th March 2019 considered the Council's proposed site allocations at Madley and Bosbury. The Inspector recommended that the site at Bosbury should be taken forward as a proposed Main Modification with relevant details to guide development including the need for landscaping. The Inspector expressed concern regarding the site at Madley due to safe vehicular access; noise; and, potential capacity for the 10 proposed pitches in the remaining area as the southern part of the site would be landscaped as a sound attenuation/screening measure. Therefore, the Inspector recommended that this site is not a proposed Main Modification to the DPD but the area in the vicinity of the site should be considered as a broad location for growth for years 6 to 10 as referred to in paragraph 10b) of the Planning Policy for Traveller Sites (August

¹ One pitch at Romany Close, Grafton; Two pitches at Extension to Orchard Caravan Park, Lower Bullingham; Two pitches at Openfields Caravan Site, Bromyard; Four pitches at Pembridge Caravan Site.

 $^{^2}$ Temporary stopping place at Land to the west of A49 Leominster for five pitches.

³ Herefordshire Council (2018) Herefordshire Local Plan – Travellers' Sites Development Plan – Proposed approach to finding additional sites to meet Five Year Requirement [online]. Available at: https://www.herefordshire.gov.uk/download/downloads/id/14919/coun008 herefordshire council approach to identifying additional pitches.pdf [Accessed 19 October 2018]

- 2015). In addition to these Main Modifications, further proposed Main Modifications from the first hearing are included in the Council's Schedule of Main Modifications.
- 1.5 The Herefordshire Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) Partial Update 2018 identifies Gypsy and Traveller pitch need over the next five years (2018/19 to 2022/23) equating to 52 pitches under a cultural definition, and as a subset of this number, 19 pitches under the Planning Policy for Traveller Sites (PPTS) definition of Gypsy/Traveller (those who still travel and /or intend to travel). To the end of the Local Plan period the GTAA has identified a cultural need for a further 31 pitches and, as a subset of this number, a PPTS need for a further 11 pitches. Total pitch need is therefore 30 for those complying with the PPTS definition and 83 based on cultural need. An anticipated average annual turnover of 1 pitch on local authority sites during the remainder of the plan period (2011 to 2030/31) has been allowed for.
- 1.6 The proposed sites and provisions within the Herefordshire Travellers' Sites DPD are identified in **Table 1.1** (in addition to the broad location for growth in the vicinity of Stoney Street, Madley).
- 1.7 This Second SA/HRA Addendum presents an appraisal of the proposed Main Modifications and considers their implications for the SA and HRA findings reported previously. This Addendum focuses on the 'Main Modifications' to the DPD only. Additional modifications have also been prepared to address non-substantive matters such as typographical, factual and grammatical errors. These additional modifications are not subject to SA or HRA as they do not have the potential to lead to significant sustainability effects.
- 1.8 This Second SA/HRA Addendum represents an appraisal of the Travellers' Sites DPD as proposed to be modified, updating the findings presented in the November 2017 SA and HRA reports and the October 2018 SA and HRA Addendum reports. It should be noted that this is an Addendum to those SA and HRA documents and they should therefore be read together. This Second SA/HRA Addendum will be published alongside the proposed Main Modifications to the DPD for consultation for a 6 week period from Wednesday 1st May to Wednesday 12th June 2019.

Table 1.1 Proposed allocation for residential pitches and temporary stopping places

Site Name	Site Type	Number of Pitches
Site adjacent to the roundabout on A49 Leominster, Herefordshire	Temporary Stopping Place	5
Romany Close, Grafton	Permanent Residential – Intensification within existing site	1
Extension to Orchard Caravan Park, Watery Lane, Lower Bullingham	Permanent Residential – Extension to existing site	2
Openfields Caravan Site, Bromyard	Permanent Residential – Intensification within existing site	2
Extension to Pembridge Caravan Site, Herefordshire	Permanent Residential – Extension to existing site	4
Extension to Oakfield, Nashend Lane, Bosbury	Permanent Residential – Extension to existing site	4
Total number of pitches		18 (of which 13 are residential pitches)

Sustainability Appraisal and Strategic Environmental Assessment

1.9 The purpose of Sustainability Appraisal is to promote sustainable development by integrating sustainability considerations into the preparation and adoption of plans. Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the Plan-making process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the strategies and policies within a DPD - in this case the Travellers' Sites DPD - from the outset of its development.

May 2019

- 1.10 Strategic Environmental Assessment is also a statutory assessment process, required under the SEA Directive⁴, transposed in the UK by the SEA Regulations⁵. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)⁶. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.11 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses only on the likely environmental effects of a plan whilst SA includes a wider range of sustainability considerations, extending to social and economic impacts. The Government's Sustainability Appraisal guidance⁷ outlines how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. This integrated approach has been taken to the SA/SEA of the Travellers' Sites DPD and throughout the SA documents, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.
- Details on how the SA process has informed the preparation of the DPD at each stage can be found in the November 2017 SA Report which accompanied the examined DPD.

Habitats Regulations Assessment

- 1.13 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007⁸; the currently applicable version of the Habitats Regulations came into force in November 2017⁹. When preparing the Travellers' Sites DPD, Herefordshire Council is required by law to carry out an HRA although consultants can undertake the HRA on its behalf. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan document is also noted in the Government's online planning practice guidance.
- 1.14 HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
 - SACs are designated under the European Habitats Directive and target particular habitat types (Annex 1) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level.
 - SPAs are classified in accordance with Article 4(1) of the European Union Birds Directive¹⁰ for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I.
- 1.15 Potential SPAs (pSPAs) ¹¹, candidate SACs (cSACs) ¹², Sites of Community Importance (SCIs) ¹³ and Ramsar sites should also be included in the assessment.

 5 Environmental Assessment of Plans and Programmes Regulations (Statutory Instrument 2004, No 1633).

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⁴ SEA Directive 2001/42/EC.

 $^{^{\}rm 6}$ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁷ DCLG (2014) Planning Practice Guidance. Available at: http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/strategic-environmental-assessment-and-sustainability-appraisal-and-how-does-it-relate-to-strategic-environmental-assessment/

⁸ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

⁹ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

Council Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the codified version of Council Directive 79/409/EEC, as amended).

¹¹ Potential SPAs are sites that have been approved by the Minister for formal consultation but not yet proposed to the European Commission, as listed on the <u>GOV.UK website</u>.

¹² Candidate SACs are sites that have been submitted to the European Commission, but not yet formally adopted, as listed on the JNCC's **SAC list**.

 $^{^{13}}$ SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs by the UK Government.

- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- 1.16 For ease of reference during HRA, these designations can be collectively referred to as European sites despite $Ramsar^{14}$ designations being at the international level.
- The overall purpose of the HRA is to conclude whether or not a proposal or policy, or the whole 1.17 DPD, would adversely affect the integrity of the European site in question either alone or in combination with other plans and projects. This is judged in terms of the implications of the plan for the 'qualifying features' for which the European site was designated, i.e.:
 - SACs Annex I habitat types and Annex II species¹⁵;
 - SPAs Annex I birds and regularly occurring migratory species not listed in Annex I¹⁶;
 - Ramsar sites the reasons for listing the site under the Convention 17.
- 1.18 Significantly, HRA is based on the precautionary principle meaning that where uncertainty or doubt remains, an adverse impact should be assumed.

SA and HRA work previously undertaken

LUC, working on behalf of Herefordshire Council, has previously carried out several iterations of 1.19 the SA and HRA processes in relation to the Travellers' Sites DPD throughout its development. Table 1.2 lists the iterations of the Travellers' Sites DPD that have been produced and consulted on by the Council, as well as the accompanying SA and HRA work that was undertaken at each stage.

Table 1.2 Iterations of the Travellers' Sites DPD and accompanying SA and HRA work

DPD Iteration	Accompanying SA Report	Accompanying HRA Report
N/A	SA Scoping Report (June 2014)	N/A
Herefordshire Travellers' Sites DPD Issues and Options Paper (August 2014)	SA of the Herefordshire Travellers' Sites DPD Issues and Options Paper (August 2014)	N/A
Herefordshire Travellers' Sites Document Preferred Options Consultation Document (July 2016)	SA of the Herefordshire Travellers' Sites DPD Preferred Options Consultation (July 2016)	HRA of the Herefordshire Travellers' Sites DPD Preferred Options Consultation (July 2016)
Herefordshire Travellers' Sites Development Plan Document Pre-Submission Publication (November 2017)	SA of the Herefordshire Travellers' Sites DPD Pre- Submission Publication (November 2017)	HRA of the Herefordshire Travellers' Sites DPD Pre- Submission Publication (November 2017)
Herefordshire Travellers' Sites Development Plan Document	SA Addendum of the Herefordshire Traveller's Sites	HRA Addendum of the Herefordshire Traveller's Sites

 $^{^{14}}$ The term 'Natura 2000 sites' can also be used interchangeably with 'European sites' in the context of HRA, although the latter term is used throughout this report.

 $^{^{15}}$ As listed in the site's citation on the JNCC website (all features of European importance, both primary and non-primary, need to be considered).

 $^{^{16}}$ As identified in sections 3.1, 3.2 and 4.2 of the SPA's standard data form on the JNCC website; at sites where there remain differences between species listed in the 2001 SPA Review and the extant site citation in the standard data form, the relevant country agency (Natural England or Natural Resources Wales) should be contacted for further guidance.

17 As set out in contacted for further guidance.

As set out in section 14 of the relevant 'Information Sheet on Ramsar Wetlands' available on the JNCC website.

DPD Iteration	Accompanying SA Report	Accompanying HRA Report
Additional Sites Consultation (October 2018)	DPD (October 2018)	DPD (October 2018)

SA

- The most recent 'full' SA Report for the Travellers' Sites DPD is the November 2017 SA Report 1.20 which relates to the Pre-Submission Publication version of the DPD which meets all the requirements of the SEA Regulations¹⁸. The report described in detail the approach that has been taken to the SA process (Chapter 2); the sustainability context for development in Herefordshire (Chapter 3); the SA findings of the Issues and Options Paper (Chapter 4); the SA findings of the 15 reasonable alternative site options (Chapter 5); the SA findings of the Preferred Options Consultation Document (Chapter 6); the SA findings of the Pre-Submission Publication Document, including cumulative effects and proposed mitigation measures (Chapter 7); and, the monitoring indicators for monitoring the potential significant effects of implementing the DPD (Chapter 8). The Appendices outline the consultation comments received on the various iterations of the DPD and how these were addressed in the SA Reports (Appendix 1); the detailed SA matrices of the Issues and Options (Appendix 2); the assumptions used in the SA of site options (Appendix 3); the detailed SA matrices of the reasonable alternative site options and the Preferred Options Consultation Document (Appendix 4); and, the detailed SA matrices for the Pre-Submission Publication site options (Appendix 5) and policies (Appendix 6).
- 1.21 As previously outlined, this Second Addendum should be read in conjunction with the November 2017 full SA Report and the October 2018 SA Addendum Report. It is not intended to represent an 'SA Report' in the context of the SEA Regulations, which requires the presentation of certain information in the SA Report. It is not appropriate, proportionate or in the interests of effective consultation to repeat all this information in the Addendum.

HRA

- 1.22 The HRA of the Herefordshire Traveller's Sites DPD undertaken in 2017 found that the majority of the sites proposed with exception of Romany Close and Extension to Orchard Caravan Park are located some distance away from any European sites and due to their scale were considered unlikely to result in likely significant effects. The two sites at Romany Close and Extension to Orchard Caravan Park are situated in close proximity to the River Wye SAC (c.1.3km and c.900m respectively) and were considered to have potential to result in increased physical disturbance/damage, or erosion/trampling. However, in both cases, the scale of development proposed is very small and unlikely to result in significant effects on any European site.
- 1.23 In addition to this, a HRA was undertaken in 2014 of the Pre-submission Publication of the Herefordshire Local Plan Core Strategy. The assessment of Policy *H4: Traveller Sites* identified potential likely significant effects to the River Wye SAC as a result of impacts on water quality from the scale of development proposed in the Local Plan. Following collaboration between Herefordshire Council, the Environment Agency, Natural England, water companies and other relevant stakeholders to address the potential effects on water quality in the River Wye SAC, through joint working on a Nutrient Management Plan in conjunction with protection policies outlined in the Local Plan-Core Strategy (specifically policies *LD2: Biodiversity and geodiversity, SD1: Presumption in favour of sustainable development, OS1: Requirement for open space, sport and recreation facilities, OS2: Meeting open space, sport and recreation needs, and OS3: Loss of open space, sport and recreation facilities, and policy H4 itself), it was concluded that no adverse effects on integrity would occur. The overall conclusions reached in the assessment of Policy H4 are also applicable to the Travellers' Sites DPD.*
- 1.24 The October 2018 HRA Addendum identified that there was potential for the proposed site at Land at Stoney Street, Madley to result in an increase in physical disturbance/damage, or erosion/trampling to the River Wye SAC. However, as with the sites at Romany Close and Extension to Orchard Caravan Park, due to the small scale of the development and the location of the site c.3.5km from the River Wye SAC, it was considered unlikely for significant effects on the

 $^{^{18}}$ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

European site to occur. The HRA identified that Land at Oakfield, Nashend Lane, Bosbury is c. 17.5km away from the nearest European site and therefore unlikely to have any significant effects. Overall, the previous HRA reports have concluded that no likely significant effect on a European site is likely to occur from the implementation of the Travellers' Sites DPD.

Reasonable Alternatives and reasons for selecting the proposed Main Modifications

- 1.25 The November 2017 SA Report which accompanied the examined DPD describes how reasonable alternatives were considered and selected as part of the SA and plan-making processes, as required by the SEA Regulations.
- 1.26 Given that reasonable alternatives were appraised up to the submission of the DPD and also during the examination, and that preparation of the proposed Main Modifications was led by the Inspector with no further alternatives requiring SA being identified, this second SA addendum does not contain an appraisal of any alternatives.
- 1.27 The proposed Main Modifications are set out in a schedule published following the Examination hearings. The reasons for proposing each Main Modification to the DPD are included in the schedule.

2 Summary of SA implications of the Main Modifications

2.1 The detailed table setting out the Main Modifications and describing the SA implications of each can be found in **Appendix 1** with the findings summarised below.

Changes to policy wording

Table 2.1 below summarises the changes to the SA findings that would result from changes to policy wording.

Table 2.1 Changes to SA findings as a result of the Main Modifications proposing changes to policy wording

Herefordshire Travellers Sites DPD Policies	SA Objective	Likely effect as identified in the SA Report (November 2017)	Likely effect taking into account the Main Modification
TS 1: Residential Traveller Pitches and Sites	20: Cultural heritage	?	+?
and Sites	12: Waste	-	+
	13: Biodiversity	0	+?
TS 2: Travelling Showpeople plots	20: Cultural Heritage	?	+?
	12: Waste	-	+
	13: Biodiversity	+/	+?
TS 3: Site adjacent to roundabout	4: Reduce road traffic	0	+
on A49, Leominster	12: Waste	-	+

2.3 Most of the Main Modifications would result in no changes to the SA effects previously identified with the exception of the SA effects identified in **Table 2.1**. All of the changes to the SA findings as a result of the Main Modifications result in positive effects for the various SA objectives. None of the Main Modifications would result in any new significant or minor negative effects for the SA objectives.

TS 1: Residential Traveller Pitches and Sites

- 2.4 The effect for SA objective **20: Cultural heritage** has been revised from an uncertain significant negative to an uncertain minor positive effect as the policy requires proposals to be of good quality design which respects the setting of the site and local landscape as well as conserving and, where appropriate, enhancing designated and undesignated heritage assets (as recommended in the previous iteration of the SA). Furthermore, the policy states that any unacceptable adverse impacts on heritage assets should be satisfactorily mitigated. The effect is uncertain as it will depend on how well the policy is implemented.
- 2.5 The effect for SA objective **12: Waste** has been revised from a minor negative to a minor positive effect as the revised policy requires proposals to provide appropriate foul sewerage disposal on site.

2.6 The effect for SA objective **13: Biodiversity** has been revised from a negligible to an uncertain minor positive effect as it requires proposals to conserve and, where appropriate, enhance biodiversity assets as well as satisfactorily mitigating any unacceptable adverse impacts on local nature conservation designations, ecology and biodiversity. It also supports the retention of existing trees and hedgerows and requires any trees or hedgerows lost due to development to be replaced by native trees and hedgerows in appropriate areas of the site. The effect is uncertain as it will depend on how well the policy is implemented.

TS 2: Travelling Showpeople plots

- 2.7 The effect for SA objective **20: Cultural Heritage** has been revised from an uncertain significant negative to a minor positive effect as the policy requires proposals to be of overall good quality design which respects the setting of the site, local landscape character and the character and significance of designated and undesignated heritage assets (as recommended in the previous iteration of the SA). The effect is uncertain as it will depend on how well the policy is implemented.
- 2.8 The effect for SA objective **12: Waste** has been revised from a minor negative effect to a minor positive effect as the revised policy requires proposals to provide suitable foul sewerage disposal.
- 2.9 The effect for SA objective **13: Biodiversity** has been changed from a mixed effect (minor positive/significant negative) to an uncertain minor positive effect as the policy modification requires proposals to respect and minimise adverse effects on biodiversity assets. It also supports the preservation of existing trees and hedgerows and requires any that are lost to be replaced by native trees and hedgerows in appropriate areas of the site. The effect is uncertain as it will depend on how well the policy is implemented.
 - TS 3: Site adjacent to roundabout on A49, Leominster
- 2.10 The effect for SA objective **4: Reduce road traffic** has been revised from a negligible to a minor positive effect as the policy specifies that a Traffic Management Plan should be submitted as part of the planning application to ensure that the number of turning movements into the site across other traffic streams is minimised. Furthermore, it states that there are pedestrian and cycle links into Leominster from the site where there is good access to a range of services and facilities.
- 2.11 The effect for SA objective **12: Waste** has been revised from a minor negative to a minor positive effect as the policy has been updated to provide an area of hardstanding for temporary sanitation and waste management facilities to be brought on site when it is occupied and removed at the end of the stay.
- 2.12 The effect for SA objective **18: Pollution** has been revised from a minor negative to a negligible effect. The use of temporary sanitation facilities on site creates a pollution risk, particularly with regard to the proximity of the River Lugg; however, the policy has been revised to state that proposals should demonstrate that there would be no potential adverse impacts on the River Lugg SSSI.
- 2.13 There have also been some minor corrections to other SA findings (based on revised judgements) for this policy although these are not related to changes to policy as a result of a Main Modification. They are as follows:
 - SA objective **20: Cultural heritage** SA finding revised from a minor negative to a negligible effect as, given the separation distances between the site and the River Meadows Conservation Area and several Grade II Listed Buildings (within 1km), it is likely that the landscaping scheme which includes the retention of existing mature native trees will mitigate any landscape and visual impact from the development.
 - SA objective **15: Landscape** SA finding is revised from a negligible to minor positive effect as the policy states that development should retain and, where possible, enhance existing semi mature native trees on site boundaries to mitigate landscape effects.
 - SA objective **17: Flood risk** The policy requires the design of the site to apply the principles of sustainable urban drainage systems and therefore a minor positive rather than a minor negative effect is expected as this would assist in reducing risk from surface water flooding on site.

New policy - Policy TS 8 Oakfields, Nashend Lane, Bosbury

- 2.14 A new site specific policy has been introduced through the Main Modifications, which relates to the site at Oakfields, Nashend Lane, Bosbury. An assessment of this policy is presented in **Appendix 2**.
- **Table 2.2** below summaries the SA finding for the additional policy. No significant positive or negative effects have been identified.

Table 2.2 Summary of SA findings for Policy TS 8

SA Objective	TS8: Oakfields, Nashend Lane, Bosbury
1. Employment opportunities	0
2. Skilled workforce	0
8. Education	0
5. Health	0
9. Reduce and prevent crime	0
10. Reduce poverty	0
4. Reduce road traffic	+/-
6. Recreation	0
11. Housing	+
19. Land use	-
20. Cultural heritage	-?
12. Reduce waste	+
14. Natural resources	0
16. Climate change	0
13. Biodiversity	0
15. Landscape quality	+
17. Flood risk	+
18. Minimise pollution	0

- 2.16 The policy is assessed as having negligible effects in relation to objectives under the following topics: employment; economy; education; health; crime; poverty; recreation, natural resources; climate change; biodiversity; and pollution, because it would not directly affect any of these issues.
- 2.17 A minor positive effect is recorded in relation to the provision of appropriate accommodation (under SA objective 11: **Housing**). The provision of four additional pitches will be a valuable addition to local capacity for the Traveller community. A minor positive effect is also identified for SA objective **12: Waste** as the policy requires proposals to be supported by waste collection arrangements. The policy requires proposals to provide landscaping in accordance with policy TS1 and for any existing landscaping to be retained and opportunities for enhancement explored.

- Therefore, a minor positive effect is expected for SA objective **15: Landscape**. A minor positive effect is identified for 17: **Flood risk**, as the policy requires details of a drainage strategy to be submitted alongside a planning application potentially helping to reduce the risk of surface water flooding.
- 2.18 Minor negative effects are identified for SA objectives **19: Land use** and **20: Cultural heritage**. In relation to SA objective **19**, the policy makes no reference to balancing land uses even though it is located on mostly greenfield land, which represents a less efficient use of land than development on a previously developed site. In relation to SA objective **20**, the site is within close proximity to some Listed Buildings; however, the policy does not contain any specific consideration for conserving heritage assets. This effect is minor rather than significant in nature as the site is relatively well screened.
- 2.19 A mixed effect (minor positive/minor negative) is expected for SA objective **4: Reduce road traffic.** While this policy requires proposals to demonstrate appropriate and safe vehicular access as well as appropriate turning space within the site which will minimise risks associated with car travel, the site is not within or adjoining a main town and is not served by public transport.

Broad location for growth

- 2.20 Land at Stoney Street, Madley was included in the additional sites consultation that was carried out as part of the examination of the Travellers' Sites DPD. However, it was not taken forward as a site allocation due to issues regarding safe vehicular access; noise; and, potential capacity for the 10 proposed pitches in the remaining area as the southern part of the site would be landscaped as a sound attenuation/screening measure.
- 2.21 The Travellers' Sites DPD recognises that there may be potential for land to be found in the vicinity of Stoney Street as part of the review of the Core Strategy and it is therefore identified as a possible broad location for growth in the medium term (2023-2028).
- 2.22 **Table 2.3** below summarises the SA findings for the broad location for growth. All effects are uncertain as it is not identified as a site allocation but as a possible broad location for growth in the medium term (2023-2028) and therefore the exact location of a potential site and its deliverability is uncertain.

Table 2.3 Summary of SA effects for the broad location for growth at Stoney Street, Madley

SA Objective	Land in the vicinity of Stoney Street, Madley
1. Employment opportunities	+?/-?
2. Skilled workforce	0
8. Education	+?/-?
5. Health	+?/-?
9. Reduce and prevent crime	0
10. Reduce poverty	0
4. Reduce road traffic	+?/-?
6. Recreation	+?/-?
11. Housing	+?
19. Land use	+?/-?
20. Cultural heritage	0?

12. Reduce waste	0
14. Natural resources	+?/-?
16. Climate change	0
13. Biodiversity	-?
15. Landscape quality	0
17. Flood risk	0?/-?
18. Minimise pollution	-?

- 2.23 There were no significant positive or negative effects identified from the SA for the broad location growth at Stoney Street.
- Seven SA objectives were found to have uncertain mixed effects (minor positive/minor negative) (1: Employment, 8: Education, 5: Health, 4: Reduce Road traffic and 6: Recreation). The uncertain minor positive effects were identified due to the close proximity to several industrial estates which may provide employment opportunities; and, the close proximity to areas of open space, healthcare facilities, Public Rights of Way, schools, as well as to bus stops which may provide access to jobs, services and facilities further afield. The uncertain minor negative effects were identified as, depending on the exact location of any future site, employment opportunities, healthcare facilities and other services may or may not be within reasonable walking distance (assumed to be 800m). The uncertain minor negative effect for SA objective 4: Reduce road traffic also relates to the Inspector's Report at Examination stage which identified that there is an issue with safe vehicular access with commercial vehicles entering and leaving the Stoney Street Industrial Estate which may affect potential sites in the vicinity of Stoney Street.
- 2.25 Uncertain mixed effects (minor positive/minor negative) were also identified for SA objectives 19: Land use and 14: Natural resources as land in the vicinity of Stoney Street comprises a mix of previously developed land and greenfield sites. Depending on the exact location of any future site in the broad location for growth, this may or may not represent an efficient use of land and may or may not result in the loss of high quality agricultural land.
- 2.26 An uncertain minor positive effect is identified for SA objective **11: Housing** as the broad location for growth may provide accommodation for Travellers if developed, however, the deliverability of any future site in this area is uncertain.
- 2.27 Uncertain minor negative effects were identified for two SA objectives (13: Biodiversity and 18: Pollution) as the broad location for growth is located in close proximity to several Local Wildlife Sites and Sites of Special Scientific interest (SSSIs); and is also in close proximity to the Stoney Street industrial estate where noise pollution may impact on residents of any future site in the broad location for growth. An uncertain mixed effect (negligible/minor negative) is identified for SA objective 17: Flood risk as land in the vicinity of Stoney Street is generally not within a flood zone; however, there are some areas at risk from fluvial flooding. The effects are uncertain as this area is not identified as a site allocation but as a possible broad location for growth in the medium term (2023-2028) and therefore the exact location and the deliverability of a future site is uncertain.
- 2.28 Negligible effects are identified for the remaining SA objectives, as the broad location for growth would not directly affect them.

Secondary, synergistic and cumulative effects

2.1 The above SA findings have been considered in the context of the secondary, synergistic and cumulative effects assessment, presented in **Chapter 7: SA Findings – Pre-Submission Publication stage** of the 2017 November SA Report.

2.2 There are no changes to the assessment of effects presented in Chapter 7 of the 2017 November SA Report.

Monitoring Framework

2.3 The 2017 November SA Report included a proposed Monitoring Framework for monitoring the likely significant effects of the Travellers' DPD (**Table 8.1** in the SA Report). This presented monitoring indicators in relation to the SA objectives for which likely significant effects (either positive or negative) were identified in the SA (SA objectives 13: Biodiversity; 14: Natural resources; 15: Landscape quality; 17: Flood risk; 18: Minimise pollution; and 20: Cultural heritage). No significant effects have been identified as a result of the Main Modifications. Although the Main Modifications have resulted in several significant negative effects been reduced, these SA objectives were still assessed as likely to experience significant effects for other sites/policies in the Travellers' Sites DPD. Therefore, there is no change to the Monitoring Framework presented in **Chapter 8: Monitoring** of the 2017 November SA Report.

3 Summary of HRA implications of the Main Modifications

- 3.1 The amendments to existing policies TS 1, TS 2 and TS 3 from the Main Modifications and the addition of new policy TS 8 would not affect the conclusions set out in the November 2017 HRA Report and October 2018 HRA Addendum Report. The allocation of Land at Oakfield, Nashend Lane, Bosbury as an allocated site (policy TS 8) is unlikely to have a significant effect as the site is c. 17.5km away from the nearest European site. The allocation of Romany Close (policy TS 4), Extension to Orchard Caravan Park (policy TS 5), and land in the vicinity of Stoney Street as a broad location for growth have the potential to result in an increase in physical disturbance/damage or erosion/trampling to the River Wye SAC. However, in all cases, the scale of development proposed is very small and unlikely to result in significant effects on the European site.
- 3.2 As with the Local Plan Core Strategy HRA, the mitigation measures for potential recreational effects (increased physical disturbance/damage or erosion/trampling) are as follows:
 - Policy H4 specifies that sufficient on-site play areas should be provided, which will reduce effects due to recreational activities;
 - Policies OS1-OS3, which relate to open space, sport and recreation may help to relieve any increase in pressure on European sites for recreation space, if appropriately implemented;
 - Good practice construction techniques including noise suppression measures, hours of operation etc. may help to mitigate potential adverse effects during construction. The measures included in Policy SD1: Sustainable Design and Energy Efficiency should help to mitigate potential impacts relating to non-physical disturbance; and
- 3.3 In addition, Policy *TS 1: Residential Traveller Pitches and Sites* and Policy *TS 2: Travelling Showpeople Plots* in the Herefordshire Travellers' Sites DPD require proposals to incorporate into the design of the site a safe area for children to play, which like Policy *H4: Traveller Sites* will provide mitigation and reduce the effects from recreational activities.
- 3.4 Furthermore, a Nutrient Management Plan in conjunction with protection policies outlined in the Local Plan-Core Strategy (specifically policies LD2: Biodiversity and geodiversity, SD1: Presumption in favour of sustainable development, OS1: Requirement for open space, sport and recreation facilities, OS2: Meeting open space, sport and recreation needs, and OS3: Loss of open space, sport and recreation facilities, and policy H4 itself), will ensure that no significant adverse effects to water quality of the River Wye SAC are likely to occur from the scale of the development in the Local Plan and the Travellers' Sites DPD. In addition, Policy TS 1 in the Travellers' Sites DPD requires biodiversity assets to be conserved and, where appropriate, enhanced and requires any unacceptable adverse impact on local nature conservation designations, ecology, or biodiversity to be satisfactorily mitigated, which will also provide mitigation and reduce effects on the European site.
- 3.5 Therefore, it is concluded that the Herefordshire Travellers' Sites DPD as proposed to be modified through the Main Modifications will not result in a likely significant effect on any European site.

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4 Conclusions and next steps

- 4.1 The SA of the Herefordshire Travellers' Sites DPD Main Modifications has concluded that all of the changes to the SA findings for previously assessed policies result in positive effects for the various SA objectives. None of the Main Modifications would result in any new significant negative or positive effects for the SA objectives. Therefore, there are no changes to the assessment of cumulative, synergistic or secondary effects presented in the 2017 November SA Report. There is also no change to the Monitoring Framework presented in the 2017 November SA Report.
- 4.2 The HRA of the Herefordshire Travellers' Sites DPD Main Modifications concluded that the DPD as proposed to be modified through the Main Modifications will not result in a likely significant effect on any European site.
- 4.3 Following consultation on the Main Modifications and this SA and HRA Addendum, the representations received will be considered by the Inspector when producing his final report regarding the soundness of the DPD.

LUC

May 2019

Appendix 1

Schedule of Main Modifications and their implications for the SA findings reported previously

Herefordshire Travellers Sites DPD Examination - Main Modifications

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports	
MM1	Paragraph 2.5	These definitions apply to land use planning purposes only and do not relate to ethnicity. However ethnicity is not determined by accommodation choice and it is understood that the definition in the planning policy guidance is currently the subject of legal challenge. The PPTS makes clear that it is referring to Travellers who meet the definition in Annex 1. Therefore, this DPD addresses the accommodation needs of those Travellers who meet the definition set out in the PPTS. The accommodation needs of those Travellers that do not meet the definition will be provided for in the Core Strategy Review.	To update text as the legal challenge was withdrawn. The additional text provides clarity about what the DPD covers as recommended by the Inspector at the May 2018 hearing sessions.	No change to SA findings – the wording is amended for clarity about the scope of the DPD and the changes do not affect policy wording or the SA findings.	
MM2	Paragraph 4.7 The GTAA took into account the revised definition in the PPTS. Through interviews with 74.8% of the Traveller households living on pitches in the county, the consultants identified what proportion of these would meet the PPTS definition in terms of how often they travel, when they last travelled, and when they intend to travel in the future. The latest GTAA therefore identifies a pitch requirement based on the PPTS definition but they also looked at a requirement for pitches based on 'cultural need' was also included. That is, the need for new pitches for those Travellers that do not need the PPTS definition		To include new text to make clear that this DPD is referring to Travellers that meet the government's definition of gypsies and Travellers for planning purposes as included in the PPTS.	No change to SA findings – the amended wording clarifies that the DPD focuses on making provision for Travellers as defined in the PPTS and the changes do not affect policy wording or the SA findings.	

Modification number	Paragraph / Policy reference	Proposed Main Modification		Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports	
		but are ethnically gypsies and Travellers. Therefore the GTAA identifies two different sets of requirements for pitches based on this approach as set out below but this DPD focuses on making provision for those Travellers meeting the definition set out in the PPTS in line with Government guidance.				
ммз	Table 1	Table 1 extract from GTAA 2017 Table 6.1 Overall plan period Gypsy and Traveller pitch need		Delete the table and replace with updated figures agreed following the first hearing session.	No change to SA findings – Paragraph 1.5 of this SA Report updates paragraph 1.7 of the 2017 November SA Report which outlined the	
		-	Of which: Cultura PPTS I-need need			previous GTAA figures. However, the revision to the figures does not affect policy wording or SA findings.
		Historic Pitch need 2011/12 to 2016/17	' 14 6			
		5yr Pitch need (2017/18 to 2021/22)	48	17		
		Longer-term Pitch need (2022/23 to 2030/31) 26 10				
		TOTAL Pitch need for the whole Local Plan Period (2011/12 to 2030/31)	91	33		

Modification number	Paragraph / Policy reference	Proposed Main Modification			Reason for Main Modification	Implications of Main Modification for the findings set out in th previous SA Reports
		TOTAL Pitch need for the remainder of the Local Plan Period (2017/18 to 2030/31)	74	27		
		Expected turnover on LA sites over the Plan Period	84	84		
		RESIDUAL PITCH REQUIREMENT DURING THE REMAINDER OF THE PLAN PERIOD (2017/18 to 2030/31)	Addres	Addres		
		including turnover	sed	sed		
		Delete above table and replace we Table 1 Overall plan period of pitch need Revised Table 5.3 Overall and Traveller pitch need		od Gypsy		
			Cultura I need	Of which: PPTS need		
		5yr pitch need (2018/19 to 2022/23)	<u>52</u>	<u>19</u>		

Modification number	Paragraph / Policy reference	Proposed Main Modification		Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports	
		Longer-term need to 2023/24 to 2030/31	<u>31</u>	11		
		TOTAL pitch need 2018/19 to 2030/31 (Local Plan Period)	<u>83</u>	<u>30</u>		
MM4	Paragraph 4.8	The GTAA <u>partial</u> update 2017–8 has found evidence of Gypsy and Traveller pitch need over the next five years (2018/189 to 2021/2222/23 equating to 48 52 pitches under a cultural definition, and as a subset of this number, 17–19 pitches under the PPTS 2016 definition of Gypsy and Traveller (those who still travel and /or intend to travel). To the end of the Local Plan period the GTAA has identified a cultural need for a further 31 pitches and, as a subset of this number, a PPTS need for a further 11 pitches. Total pitch need is therefore 30 for those complying with the PPTS definition and 83 based on cultural need.		These figures were amended to take into account new planning permissions granted between July 2017, (when the GTAA update was published prior to submission), and August 2018 (when changes to the tables were finalised following the hearing sessions).	No change to SA findings – Paragraph 1.5 of this SA Report updates paragraph 1.7 of the 2017 November SA Report which outlined the previous GTAA figures. However, the revision to the figures does not affect policy wording or SA findings.	
MM5	Paragraph 4.9	For the full Local Plan Period (20: the GTAA has identified a cultura and, as a subset of this number a pitches.	l need for	91-pitches	This is deleted because the starting point for the assessment of pitches is 2018/19 based on survey work largely undertaken in April/May 2017.	No change to SA findings – Paragraph 1.5 of this SA Report updates paragraph 3.28 of the November 2017 SA Report which outlined previous GTAA figures. However,

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
				the deletion of text does not affect policy wording or SA findings.
MM6	Paragraph 4.10	For the remaining local plan period (2017 8 /18 9 to 2031 9 /32 1 the GTAA partial update has identified a cultural need for 74 31 pitches and, as a subset of this number a PPTS need for 27 11 pitches.	Delete paragraph and move explanation of requirement for new pitches to paragraph 4.8 as above.	No change to SA findings – Paragraph 1.5 of this SA Report updates paragraph 1.7 of the 2017 November SA Report which outlined the previous GTAA figures. However, the revision to the figures does not affect policy wording or SA findings.
MM7	Paragraph 4.11	The GTAA includes consideration of how t <u>Turnover on sites may impact on the supply of pitches.</u> Turnover takes into account the effect of a pitch being vacated by one resident and then becoming available for another occupant <u>and may impact on the supply of pitches.</u> Taking into account a <u>A</u> n anticipated average annual turnover of 6-1 pitches on local authority sites during the remainder of the plan period (2017 <u>8</u> /18 to 2031 <u>0</u> /32 <u>1</u>), this equates to 84 pitches becoming available <u>has been allowed for</u> . Therefore, both the cultural and PPTS shortfalls are likely to be addressed through turnover. However there is still a requirement to identify a five year supply of pitches in accordance with PPTS	Paragraph deleted to reflect amended approach to turnover.	No change to SA findings – The deletion of text regarding turnover does not affect policy wording or the SA findings.

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		requirements.		
MM8	Paragraph 4.12	As stated above the GTAA identifies a requirement of 33 pitches between 2011 and 2031. There have been 18 completions of traveller pitches between 2011 and 2017 leaving a residual requirement of 15 for the plan period. Therefore the five year requirement is between 5 and 6 pitches. The development of sites identified in this document will more than meet this requirement. Therefore at this stage there is no need to identify any further sites for the remaining plan period but this will be kept under review through regular GTAA updates and with regard to the outcome of the legal challenge to the PPTS definition. The GTAA recommends that this evidence base is refreshed on a five yearly basis to ensure that the level of pitch and plot provision remains appropriate for the Gypsy and Traveller and Travelling Showpeople population across Herefordshire. These updates will ensure that the impact of turnover on the supply of sites is monitored and its implications for the five year supply of sites is monitored and its implications for the five year supply is kept under review.	Paragraph deleted to as no longer relevant given revised approach to turnover and five year requirement.	No change to SA findings – The deletion of text regarding turnover and the five-year requirement for traveller pitches does not affect policy wording or the SA findings.
ММ9	Paragraph 4.13	The focus for the allocation and delivery of the additional pitches is to make the most efficient use of land and service provision by increasing the number of pitches within council owned sites, where there is capacity to do so, and by extending the council owned sites. This approach provides both	To update and reorder text to include reference to additional allocation.	No change to SA findings – The addition of the Land at Stoney Street as a broad location for growth is assessed under MM12 and the addition of

Modification number	Paragraph / Policy reference	Proposed Main Modification		Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		certainty of delivery and will also comeeting the demands of the waiting sites. In addition pitches are also an extension to an existing private. A broad location for growth that may help meet the accommon of years 6-10 (i.e. 2023/4 to 2020) only these sites are allocated in the recognised that there will still be a dismall private sites as some families as a family unit on their own site. In also these provides the opportunity mix of tenure and own ownership are certainty of delivery. Therefore a received for such sites In addition allocations planning applications pitches will be considered against the policies of the Core Strategy and this of whether the five year requirements.	n lists for these o allocated as ately owned h is identified odation needs 27/8). Although document it is demand for new would rather live ogether, This of for a greater nd also provide ny applications to these of for additional he relevant s DPD regardless		Oakfields, Nashend Lane, Bosbury as a site allocation is assessed under MM16.
MM10	Table 2	0.00		Update to include additional allocation.	No change to SA findings - The addition of the extension to Oakfields, Nashend Lane is assessed under MM16.

Modification number	Paragraph / Policy reference	Proposed Main Modification	1		Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		Extension to Orchard Caravan Park, Lower Bullingham Openfields Bromyard Extension to Pembridge Extension to Oakfield Nash End Lane	2 2 4 4			
		TOTAL	9 - <u>13</u>			
MM11	Paragraph 4.14			 The reference to waiting lists is deleted as it duplicates reference in paragraph 4.13. The additional text explains the overall supply position with the allocations and allowance for turnover. 	No change to SA findings – The deletion of text regarding waiting lists and the inclusion of text explaining the overall supply position for allocations and allowances for turnover do not affect policy wording or the SA findings.	

ragraph ! Policy ference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
ragraphs follow rent ragraph 15 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	the additional sites consultation that was carried out as part of the examination of the Travellers Sites DPD. This brownfield site was previously used as an emergency stopping place for Travellers that was owned and managed by Herefordshire Council. Planning permission was granted in 2014 for B2 General Industrial Uses under the Use Class Order. This permission was never implemented and the site has now become available for redevelopment as a private residential traveller pitches. However, it is affected by significant issues arising from its proximity to an industrial estate in relation to the impact of noise on the future residents of the site and the potential conflict with commercial vehicles entering and leaving the adjoining estate. Consequently this site has not been taken forward as part of this DPD. Nevertheless there may be potential for land to be found in the vicinity of Stoney Street as part of the review of the Core Strategy. It is therefore identified as a possible broad location for growth in the medium term (2023-2028) in accordance with the PPTS although subject to ensuring that any site can comply with the	New explanatory text to indicate potential broad location for traveller site provision in the medium term.	The broad location for growth has been subject to SA and the findings are presented in Appendix 2.
o fe fe fe ra	erence agraphs bllow ent agraph b	Land at Stoney Street, Madley was included in the additional sites consultation that was carried out as part of the examination of the Travellers Sites DPD. This brownfield site was previously used as an emergency stopping	Land at Stoney Street, Madley was included in the additional sites consultation that was carried out as part of the examination of the Travellers Sites DPD. This brownfield site was previously used as an emergency stopping place for Travellers that was owned and managed by Herefordshire Council. Planning permission was granted in 2014 for B2 General Industrial Uses under the Use Class Order. This permission was never implemented and the site has now become available for redevelopment as a private residential traveller pitches. However, it is affected by significant issues arising from its proximity to an industrial estate in relation to the impact of noise on the future residents of the site and the potential conflict with commercial vehicles entering and leaving the adjoining estate. Consequently this site has not been taken forward as part of this DPD. Nevertheless there may be potential for land to be found in the vicinity of Stoney Street as part of the review of the Core Strategy. It is therefore identified as a possible broad location for growth in the medium term (2023-2028) in accordance with the PPTS although subject to ensuring that any site can comply with the provisions of Policy TS1. The Council will seek

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		process.		
MM13	Paragraph 5.1 Policy TS1	Add the following text in paragraph 5.1 after the first sentence. Gypsy and Traveller sites may vary in their layout and type of development. Sites managed by Herefordshire Council are made up of a number of pitches which consist of hardstanding for a caravan and /or mobile home as well as a separate amenity block with cooking and washing facilities. Private sites which are either individual or small family sites often have either a small area of hardstanding or none at all and often do not include a separate permanent amenity block. Policy TS 1 – Residential Traveller Pitches and Sites Proposals for new residential Traveller pitches and sites will be supported where they conform to Policy H4 of the Core Strategy and achieve the following: 1 an overall good quality of design which respects the setting of the site and the local landscape character. 2 a good quality of build of amenity blocks, where included, to provide a decent standard for washing and cooking facilities.	 To provide clarity on different types of sites. Additional text added to point 10 in order to improve policy wording. Points a) and b) at the end of the policy are deleted as considered to provide onerous requirements. 	Change to SA findings – The revised policy wording necessitates changes to the SA findings for SA objective 20: Cultural heritage, 12: Waste and 13: Biodiversity. SA objective 20: Cultural heritage – SA score revised from an uncertain significant negative to an uncertain minor positive effect as the policy requires proposals to be of good quality design which respects the setting of the site and local landscape as well as conserving and, where appropriate, enhancing designated and undesignated heritage assets. Furthermore, the policy states that any unacceptable adverse impacts on heritage assets should be satisfactorily mitigated.
		amenity blocks, where included, should be are sensitively designed and sited using appropriate		SA objective 12: Waste - SA score revised from a

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		materials for the area. 4 Biodiversity assets and / or designated and undesignated heritage assets are conserved and where appropriate enhanced. Aany unacceptable adverse impact on landscape or local nature conservation designations, ecology, biodiversity or heritage assets should can be satisfactorily mitigated. 5 a suitable landscaping scheme where the site boundary treatment reflects local character, local		minor negative to a minor positive effect as the revised policy requires proposals to provide appropriate foul sewerage disposal on site. SA objective 13: Biodiversity - SA finding revised from a negligible to an uncertain minor
		materials and local colour and should be a small scale structure/fence. The use of native trees, hedgerows and shrubs to form boundaries will be encouraged as an alternative to high close board fencing. 6 existing trees and hedgerows which are import to amenity should be retained. Any trees and hedgerows lost should be replaced by native trees and hedgerows in appropriate areas of the site.		positive effect as it requires proposals to conserve and, where appropriate, enhance biodiversity assets as well as satisfactorily mitigating any unacceptable adverse impacts on local nature conservation designations, ecology and biodiversity. It also supports the retention of existing trees and hedgerows and requires any trees or hedgerows lost due to development to be replaced by native trees and hedgerows in appropriate areas of the
		7 a safe area for children to play should be is included in the site layout where required. 8 safe and convenient access to the highway network for cars, pedestrians and vehicles and turning space within the site. 9 suitable arrangements for clean water supply, foul sewerage disposal and surface water drainage, and where opportunities for Sustainable		

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		Drainage Systems particularly for permeable surfaces are maximised.		site.
		10 that any commercial activity that is proposed on the site is of a type that is appropriate to the location and does not result in an adverse impact on the amenity of any local residents or and other land users.		
		11 external lighting is kept to a minimum and should be directed down to the ground, to avoid light pollution.		
		12 Site layout should have proper regard to health and safety requirements including adequate spacing between perimeter boundaries and any structures on site and between structures which meet fire safety standards.		
		In addition to the above: a) opportunities to deliver an on-site shared community building should be explored.		
		b) Details of any animals to be kept on the site and associated requirements for grazing areas should be provided.		
MM14	Paragraph 5.2 Policy TS2	Amend to read: The GTAA identifies a need for nine travelling showpeople plots to 2031 . The Council will continue to work with the Travelling Show Persons Guild and the local community to encourage these sites to come forward for this purpose. The requirement will be met through the planning	 Include additional text to clarify the difference in site requirements as between Traveller and Travelling Show Persons. First sentence of policy amended to be 	The revised policy wording necessitates changes to the SA findings for SA objective 20: Cultural Heritage, 212: Waste, and 13: Biodiversity.

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		application process. and Policy TS2 seeks to encourage the supply of suitable sites and recognises the differences in the site requirements for travelling show people plots in comparison with other traveller sites. In particular they usually require sufficient space for both living accommodation as well as for the storage and maintenance of fairground equipment. Because of the specific requirements and differences to the other traveller sites and given that there are no allocations for show people plots land, this enabling policy aims to encourage the provision of additional showpeople sites is included. Regard has been had to the Showman's Guild's document "A Planning Focus Model Standard Package - Revised September 2007".	consistent with policy TS1 Criterion 1 amended to as potentially too restrictive. Criterion 3 amended to clarify that reasonable proximity to the strategic road network is required rather than direct access to it. Other changes to enable consistent approach to TS1.	SA objective 20: Cultural Heritage – SA finding has been changed from uncertain significant negative to an uncertain minor positive effect as the proposal requires proposals to be of overall good quality design which respects the setting of the site, local landscape character and the character and significance of designated and undesignated heritage assets. SA objective 12: Waste-SA finding has been revised from a minor negative effect to a minor
		Policy TS2 – Travelling Showpeople plots Proposals Planning applications for new plots for Travelling Show People will be supported encouraged to meet the identified need where they meet the following criteria conform to Policy H4 of the Core Strategy and achieve the following: 1. The site should be relatively level and large enough able to accommodate residential accommodation as well as space and or buildings for		positive effect as the revised policy requires proposals to provide suitable foul sewerage disposal. SA objective 13: Biodiversity- SA finding has been changed to an uncertain minor positive effect as the policy modification requires

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Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		storage and maintenance of equipment if required. 2. The site should have satisfactory vehicular access, suitable for the safe and convenient movement into and out of the site of large vehicles including those carrying fairground equipment. 3. The site should be in have suitable access reasonable proximity to the strategic road network. 4. Measures to reduce the risk of flooding should be incorporated into the design and layout. Permeable surfaces should be incorporated to minimise surface water run off. Suitable arrangements for clean water supply, foul sewerage disposal and surface water drainage should be included in the design and opportunities for sustainable drainage systems area maximised. 5. The commercial activity of the site should not impact on the amenity of local residents or and-other land users. Planning conditions may be considered to reduce any theimpact from noise on to nearby residential properties or businesses. 6 Site layout should have proper regard to health and safety requirements including adequate spacing between perimeter boundaries and any structures to meet fire safety standards. 7 An overall good quality of design which respects the setting of the site, and the local		proposals to respect and minimise effects on any biodiversity assets. It also supports the preservation of existing trees and hedgerows and requires any that are lost to be replaced by native trees and hedgerows in appropriate areas of the site.

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		landscape character, the character and significance of designated and undesignated heritage assets and minimises any impacts on biodiversity assets. 8 The site boundary treatment reflects local character, local materials and local colour. The use of native trees, hedgerows and shrubs to form boundaries will be encouraged. 9 Existing trees and hedgerows which are important to amenity should be retained. Any trees and hedgerows lost should be replaced by native trees and hedgerows in appropriate areas of the site. 10 Where required, a safe area for children to play should be incorporated into the design. 11 External lighting should be is kept to a minimum and should be directed down to the ground, to avoid light pollution.		
MM15	TS3 Paragraph 6.4 Paragraph 6.5	Site Type: Temporary Stopping Place of 5 pitches Policy TS3 Proposals for development at this site should: • Provide an area of hardstanding for • towing vehicles and caravans for short stays only • temporary sanitation and waste management facilities to be brought on site when it is occupied and removed at the end of the stay.	 Amend policy to include reference to waste management facilities and Amend for reasons of clarity. Additional sentence inserted to reflect conclusions Risk Assessment document (PS08). Relocate reference to consultation with 	Change to SA findings – The revised policy wording and explanatory text necessitates changes to the SA findings for SA objective 4: Reduce road traffic, 12: Waste and 18: Pollution. SA objective 4: Reduce road traffic – SA finding revised from a negligible

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Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		 Not include any permanent structures apart from a small building for administrative purposes if deemed necessary. Demonstrate appropriate vehicular access and turning space into and within the site Demonstrate that there would be no potential adverse impact on the River Lugg SSSI. Retain where possible and enhance existing semi mature native trees on the boundary of the site to mitigate any landscape impact and to provide privacy to the site. Apply principles of sustainable urban drainage systems in the design. Provide a 1.8m high steel palisade fencing to prevent access onto the railway line and other fencing to prevent access onto the highway. 	Network Rail to this paragraph as this is more logical. Include additional text to ensure greater safety for residents and road users.	to a minor positive effect as the policy specifies that a Traffic Management Plan should be submitted as part of the planning application to ensure that the number of turning movements into the site across other traffic streams is minimised. Furthermore, it states that there are pedestrian and cycle links into Leominster from the site where there is good access to a range of services and facilities. SA objective 12: Waste – SA finding is revised from a minor negative to a minor positive effect as the policy has been updated to provide an area of
		Explanatory text: 6.2 This site is located on a strategic highway network and is therefore provides a suitable location for travellers passing through the county this type of use. A traffic management plan will be required to support a planning application to ensure that the number of turning movements into the site across other		hardstanding for temporary sanitation and waste management facilities to be brought on site when it is occupied and removed at the end of the stay. The SA finding for SA objective 18: Pollution has been revised from a

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
		traffic streams is minimised and to address any additional signage requirements. There are pedestrian and cycle links into Leominster from the site where there is good access to a range of services and facilities. 6.4 The site is partially visually contained by existing semi mature native woodland on site. Further		minor negative to a negligible effect. The use of temporary sanitation facilities on site creates a pollution risk, particularly with regard to the proximity of the River Lugg however, the policy has been revised to state that
		planting will be required to enhance this where this does not impact on the visibility of the access to the site. Consultation with Network Rail will be required to ensure that any such fencing meets the requirements of Network Rail and that the site is safe and secure.		proposals should demonstrate that there would be no potential adverse impacts on the River Lugg SSSI.
		6.5 A railway line is adjacent to the western boundary of the site. Therefore it is imperative that suitable safety fencing is installed and maintained to prevent access on to the railway line. Consultation with Network Rail will be required to ensure		
		that any such fencing meets the requirements of Network Rail and that the site is safe and secure. Similarly the road side part of the site will need to be securely fenced to reduce the risk of children or stray animals entering the highway.		
MM16	New	Oakfields, Nashend Lane, Bosbury	New policy and explanatory text for	The new policy, TS 8: Oakfields, Nashend

Modification number	Paragraph / Policy reference	Proposed Main Modification	Reason for Main Modification	Implications of Main Modification for the SA findings set out in the previous SA Reports
	Policy TS8	Insert map – see appendix 1 Site Type – Private Proposed allocation of four additional pitches Policy TS8 Proposals for the development of this site should: 1. Provide 4 additional residential pitches. 2. Demonstrate appropriate vehicular access and turning space within the site 3. Make provision for landscaping in accordance with policy TS1. Explanation: This is an existing private site that is situated between Bosbury and Cradley. The site area is relatively well screened. This should be retained and opportunities for any enhancement explored. Should the access at the north of the site be brought into use then consideration should be given to moving the access back to improve northbound visibility. Details of the drainage strategy and the waste collection arrangements should be provided.	additional allocation.	Lane, Bosbury, has been subject to SA and the findings are presented in Appendix 2.

Appendix 2

New and revised SA matrices

Policy TS 1: Residential Traveller Pitches and Sites

SA Objective	Appraisal Question	SA Score	Justification			
	Education and Employment					
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	 1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors. 1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. 1.3 Encourage fair and decent work conditions and increase median weekly earnings. 1.4 Help to increase diversity of job opportunities. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
2. Secure a more adaptable and higher skilled workforce.	 2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. 2.2 Reduce inequalities in skills across the county. 2.3 Promote the voluntary sector, lifelong learning and life/environmental skills. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
8. Raise Educational achievements throughout the County	8.1 Ensure that education infrastructure meets projected future demand and need.	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
	Healthy and Prospe	rous Commu	inities			
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.	 5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. 5.2 Help to reduce inequalities in health. 5.3 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation. 	+	The policy requires proposals to incorporate a safe area for children to play in the site layout which will encourage healthy lifestyles. Furthermore, it requires the design of a suitable landscaping scheme which may incorporate areas of open space and requires. It also requires any commercial activity on the site not to result in an adverse impact on amenity of local residents and other land users. Previous reference to delivering shared community buildings, adequate spacing between buildings, and proposals to include details of any animals on site were considered onerous requirements and deleted as part of the Main Modifications. Overall, the policy will continue to have a minor positive effect on this SA			

SA Objective	Appraisal Question	SA Score	Justification
3A Objective	Appraisal Question	SA SCOLE	objective.
			objective.
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the county.	 9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. 9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures. 9.3 Encourage respect for people and the environment. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.
10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	 10.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age. 10.2 Enable the involvement of all affected parties, including hard to reach groups. 10.3 Promote equality, fairness and respect for people and the environment. 10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.
	Transport a	nd Access	
4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	 4.1 Reduce the need to travel. 4.2 Promote more sustainable transport patterns in areas suffering from congestion, 4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 4.4 Increase the use of public transport, cycling and walking. 4.6 Minimise risks associated with car travel. 	+	The policy will have a minor positive effect as it requires proposals to provide safe and convenient access to the highway network for cars, pedestrians and vehicles and turning space within the site.
6. Improve equality of access to and engagement in quality cultural,	6.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport.	+	The policy will have a minor positive effect as it supports the sensitive design and siting of amenity blocks.

SA Objective	Appraisal Question	SA Score	Justification
educational, leisure, sporting, recreational and community activities for all.	 6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport 		
	and/or as a catalyst for urban and rural regeneration.		
	The Built En	vironment	
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	 11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction. 11.6 Improve the wider built environment and sense of place. 	++	A significant positive effect is expected for this SA objective as it supports proposals for new residential Traveller pitches and sites.
19. Ensure integrated, efficient and balanced land use.	19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials.	-	The policy does not encourage new developments to be located on previously developed land or primarily focussed near urban areas to reduce the need to travel to access services.
20. Value, protect and enhance the character and built	20.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including	+?	The policy is expected to have a minor positive effect on this SA objective as it requires good quality design which respects the setting of the site and local landscape as well as

SA Objective	Appraisal Question	SA Score	Justification
quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings. 20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area. 20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place? 20.4 Encourage cleanliness and/or improve the general appearance of the area.		conserving and, where appropriate, enhancing designated and undesignated heritage assets (as recommended in the previous iteration of the SA). Furthermore, any unacceptable adverse impacts on heritage assets should be satisfactorily mitigated. The effect is uncertain as it will depend on how well the policy is implemented.
	Resource Consumption	and Climate	e Change
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	 12.1 Minimise the use of non re-usable materials. 12.2 Minimise waste from households, businesses etc. including hazardous waste. 12.3 Promote re-use, recovery and recycling of waste. 12.4 Deal with waste locally and/or through the best Practical Environmental Option. 	+	The policy will have a minor positive effect on this SA objective as it requires proposals to provide appropriate foul sewerage disposal on site.
14. Use natural resources and energy more efficiently.	 14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials. 14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.
16. Reduce Herefordshire's vulnerability to the impacts of climate	16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources.	-	The policy will have a minor negative effect on this SA objective as it requires proposals to provide convenient access to the highway network for vehicles which encourages private car use and therefore the emission of greenhouse gas

CA Objective	Annuaisal Overtion	CA Coore	1. obification
SA Objective	Appraisal Question	SA Score	Justification
change as well as its	16.2 Increase the proportion of energy generated from		emissions.
contribution to the	renewable and low carbon sources including by		
problem.	micro-generation, Combined Heat and Power		
	(CHP), district heating and in transportation.		
12.1/1	The Natural E	nvironment	
13. Value, maintain, restore and expand county biodiversity.	 13.1 Protect or enhance habitats of international, national, regional or local importance. 13.2 Protect international, national, regional or locally important terrestrial or aquatic species. 13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 13.4 Manage access to sites in a sustainable way that 	+?	The policy will have a minor positive effect on this SA objective as it requires proposals to conserve and, where appropriate, enhance biodiversity assets as well as satisfactorily mitigating any unacceptable adverse impacts on local nature conservation designations, ecology and biodiversity. It also supports the retention of existing trees and hedgerows and requires any trees or hedgerows lost due to development to be replaced by native trees and hedgerows
15 Value makes	protects or enhances their nature conservation value. 13.5 Create new appropriate habitats.		in appropriate areas of the site. The effect is uncertain as it will depend on how well the policy is implemented.
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	 15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings. 15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users. 	+	The policy will have a minor positive effect on this SA objective as it supports good quality design of sites that respect local landscape character. Furthermore, it requires amenity blocks to be sensitively designed and sited using appropriate materials for the area. It also requires any unacceptable adverse impacts on the landscape to be satisfactorily mitigated. Proposals should include a suitable landscaping scheme where the site boundary treatment reflects local character, local materials and local colour. The policy encourages the use of native trees, hedgerows and shrubs to form boundaries as an alternative to high close board fencing. The effect is uncertain as it will depend on how well the policy is implemented.
17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	 17.1 Reduce flood risk both presently and taking into account climate change. 17.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 17.3 Include sustainable urban drainage systems where appropriate. 	+	The policy supports the incorporation of Sustainable Drainage Systems to reduce the risk of flooding on site. Therefore, a minor positive effect is expected for this SA objective.
18. Minimise local	18.1 Minimise water, air, soil, groundwater, noise and	+	The policy supports requires proposals to include

SA Objective	Appraisal Question	SA Score	Justification
and global pollution and protect or enhance environmental resources.	light pollution from current activities and the potential for such pollution. 18.2 Protect and enhance the quality of watercourses. 18.3 Provide opportunities to improve soil quality or reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking. 18.5 Encourage the use of clean technologies and water minimisation techniques.		arrangements for clean water supply, foul sewerage disposal and surface water drainage which will help to protect the quality of watercourses. Furthermore, the policy requires external lighting to be kept to a minimum and directed down to the ground to avoid light pollution. A minor positive effect is therefore expected for this SA objective.

Policy TS 2: Travelling Showpeople plots

SA Objective	Appraisal Question	SA Score	Justification			
	Education and Employment					
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	 1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors. 1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. 1.3 Encourage fair and decent work conditions and increase median weekly earnings. 1.4 Help to increase diversity of job opportunities. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
2. Secure a more adaptable and higher skilled workforce.	 2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. 2.2 Reduce inequalities in skills across the county. 2.3 Promote the voluntary sector, lifelong learning and life/environmental skills. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
8. Raise Educational achievements throughout the County	8.1 Ensure that education infrastructure meets projected future demand and need.	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.			
	Healthy and Prospe	rous Commu	ınities			
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.	 5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. 5.2 Help to reduce inequalities in health. 5.3 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation. 	+	The policy will have a minor positive effect, enabling older members of the Travelling Show community to stay at home – and thus access consistent, good quality healthcare – year-round if desirable. Similarly, parents and young children could enjoy similar continuity of care. This could help to address health inequalities between this and settled communities.			
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the	9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour.9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour	+	This policy is likely to have a minor positive effect, through the live-work element of appropriate sites – ensuring that the equipment on which Travelling Showpeople rely for their income is secure and conveniently located adjacent to			

SA Objective	Appraisal Question	SA Score	Justification
county.	through design measures. 9.3 Encourage respect for people and the environment.	SA Score	residential sites. The design and amenity considerations contained in the policy should help to ensure that any adverse effects on neighbouring residents are minimised through appropriate
			siting of storage and maintenance yards for equipment. Similarly, the provisions in relation to playspace for children, should ensure that such sites are safe, secure and pleasant locations for users.
10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas	10.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age.		The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.
in the county and the rest of the county.	 10.2 Enable the involvement of all affected parties, including hard to reach groups. 10.3 Promote equality, fairness and respect for people and the environment. 10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages. 	0	
	Transport a	nd Access	
4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	 4.1 Reduce the need to travel. 4.2 Promote more sustainable transport patterns in areas suffering from congestion, 4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 4.4 Increase the use of public transport, cycling and walking. 4.6 Minimise risks associated with car travel. 	-	The policy is likely to have a minor negative effect on this SA objective, as sites are explicitly required to facilitate road transport, within reasonable proximity to the strategic road network. While appropriate siting and design considerations included in the policy should help to reduce the impact of such sites on the local road network, some degree of disruption as a consequence of large vehicles, including those carrying fairground equipment, is inevitable – although this is likely to be limited to a few occurrences a year (depending on travel patterns).
6. Improve equality of access to and engagement in quality cultural,	6.1 Maintain or increase the type or quality of facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport.	+	The policy is likely to have a minor positive effect, ensuring that children can – if desirable – remain in a fixed location and access consistent educational provision, along with other relevant local amenities on the same basis as settled

SA Objective	Appraisal Question	SA Score	Justification
educational, leisure, sporting, recreational and community activities for all.	 6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration. 	SA Score	communities.
	The Built En	vironment	
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	 11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction. 11.6 Improve the wider built environment and sense of place. 	+	The policy inherently makes provision for the development of housing / residential accommodation tailored to the needs of Travelling Showpeople. While it will not increase overall supply, it will cater to an important identified need. Design and amenity elements of the policy should contribute to the conservation and enhancement of the built environment.
19. Ensure integrated, efficient and balanced land use.	 19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials. 	+/-	The policy has the potential to generate either/both positive or negative effects. Brownfield sites may not be appropriate, given the potential need for remediation and frequent town centre locations – which would not be suitable, given the need for HGV and, often, outsize load access. Such locations could give rise to significant disruption to the local road network – albeit frequency of effects may vary depending on travel patterns. The inherent need for good accessibility of the strategic road network suggests edge-of-town locations, contrary to the desire for sustainable transport-focused development.
20. Value, protect and enhance the	20.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner	+?	The policy will have an uncertain minor positive effect on this SA objective as it requires an overall good quality design

SA Objective	Appraisal Question	SA Score	Justification
character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings. 20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area. 20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place? 20.4 Encourage cleanliness and/or improve the general appearance of the area.		which respects the setting of the site, local landscape character and the character and significance of designated and undesignated heritage assets (as recommended in the previous iteration of the SA). The effect is uncertain as it will depend on how well the policy is implemented.
	Resource Consumption	and Climate	e Change
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	 12.1 Minimise the use of non re-usable materials. 12.2 Minimise waste from households, businesses etc. including hazardous waste. 12.3 Promote re-use, recovery and recycling of waste. 12.4 Deal with waste locally and/or through the best Practical Environmental Option. 	+	The policy will have a minor positive effect on this SA objective as it requires proposals to provide appropriate foul sewerage disposal on site.
14. Use natural resources and energy more efficiently.	 14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials. 14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build. 	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.
16. Reduce Herefordshire's vulnerability to the	16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and	-	The policy will have a minor negative effect on this SA objective as it requires proposals to be within reasonable proximity to the strategic road network for vehicles. While this

SA Objective	Appraisal Question	SA Score	Justification
impacts of climate	industrial sources.	SA SCOLE	is unlikely to increase overall emissions, the policy inherently
change as well as its	16.2 Increase the proportion of energy generated from		supports the use of fossil fuel-consuming HGVs and
contribution to the	renewable and low carbon sources including by		, · ·
problem.	micro-generation, Combined Heat and Power		equipment.
problem.			
	(CHP), district heating and in transportation. The Natural E	nviron mont	
12 Value maintain		nvironment	
13. Value, maintain,	13.1 Protect or enhance habitats of international,		This policy will have an uncertain minor positive effect on this
restore and expand	national, regional or local importance.		SA objective as it requires proposals to respect and minimise
county biodiversity.	13.2 Protect international, national, regional or locally		effects on any biodiversity assets.
	important terrestrial or aquatic species.		There are alcours of the maliculation to a visiting to a cond
	13.3 Maintain wildlife corridors and minimise		There are clauses of the policy that require existing trees and
	fragmentation of ecological areas and green	+?	hedgerows which are important to amenity to be retained, as
	spaces.		well as requiring any trees or hedgerows that are lost to be
	13.4 Manage access to sites in a sustainable way that		replaced by native trees/ hedgerows in appropriate areas of
	protects or enhances their nature conservation		the site. This could contribute to local biodiversity and habitat
	value.		connectivity. The effect is uncertain as it will depend on how
45.77	13.5 Create new appropriate habitats.		well the policy is implemented.
15. Value, protect,	15.1 Value, enhance and protect natural		The policy requires schemes to be well-designed, and have
enhance and restore	environmental assets including AONB's, historic		regard to local landscape character. In addition, focus on
the landscape quality	landscapes, open spaces, parks and gardens and		boundary treatment should help development blend in to the
of Herefordshire,	their settings.		local landscape.
including its rural	15.2 Encourage local stewardship of local	+	
areas and open	environments, for example by promoting best		
spaces.	practices in agricultural management.		
	15.4 Promote the use of rural areas and open space by		
	all, encourage easy non-car based access, and		
17 Deduce the state	accommodate the needs of disabled users.		A section of a section of Control of the section of
17. Reduce the risk	17.1 Reduce flood risk both presently and taking into		A minor positive effect is identified as the policy requires
of flooding and the	account climate change.		surface water drainage systems to be included in the design
resulting detriment	17.2 Prevent inappropriate development of the	+	and opportunities for sustainable drainage system areas
to public well-being,	floodplain, and include flood protection systems.		maximised.
the economy and the	17.3 Include sustainable urban drainage systems		
environment.	where appropriate.		
18. Minimise local	18.1 Minimise water, air, soil, groundwater, noise and		The policy does not contain explicit measures to control
and global pollution	light pollution from current activities and the	,	pollution. This is a potential risk in relation to the storage and
and protect or	potential for such pollution.	+/	maintenance of HGVs, plant and large-scale fairground/show
enhance	18.2 Protect and enhance the quality of watercourses.		equipment. Substantial quantities of diesel and other
environmental	18.3 Provide opportunities to improve soil quality or		hydrocarbon-based fuels and lubricants (e.g. for generators,

18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking. vehicles/machinery and may also be stored on site. Leakage may result in pollution incidents, potentially ent groundwater or watercourses in addition to contaminating	SA Objective	Appraisal Question	SA Score	Justification
water minimisation techniques. (There is a potential conflict with the aspiration for susta water drainage systems, as such surfacing in the wrong location could exacerbate groundwater and watercourse pollution.) Use of HGVs and testing/repair of equipment will genera carbon emissions and may have a local effect on air qual where such activity is extensive. The policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does however require external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how external lighting to be keeping and the policy does how externa		reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking. 18.5 Encourage the use of clean technologies and	SA Score	plant and equipment) are likely to be contained both within vehicles/machinery and may also be stored on site. Leakage may result in pollution incidents, potentially entering groundwater or watercourses in addition to contaminating soils. (There is a potential conflict with the aspiration for sustainable water drainage systems, as such surfacing in the wrong location could exacerbate groundwater and watercourse pollution.) Use of HGVs and testing/repair of equipment will generate carbon emissions and may have a local effect on air quality where such activity is extensive. The policy does however require external lighting to be kept to a minimum to avoid light pollution and that any commercial activity does not result in noise pollution affecting local

Policy TS 3: Site adjacent to roundabout on A49, Leominster

SA Objective	Apr	oraisal Question	SA Score	Justification		
	Education and Employment					
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	1.2	Maintain or increase current employment rates in knowledge and technology intensive sectors. Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. Encourage fair and decent work conditions and increase median weekly earnings. Help to increase diversity of job opportunities.	0	The policy makes no provision in relation to employment, and will therefore have a negligible effect on this objective.		
2. Secure a more adaptable and higher skilled workforce.	2.2	Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. Reduce inequalities in skills across the county. Promote the voluntary sector, lifelong learning and life/environmental skills.	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.		
8. Raise Educational achievements throughout the County	8.1	Ensure that education infrastructure meets projected future demand and need.	0	The policy contains no specific requirements with regard to educational provision. A negligible effect is therefore likely.		
		Healthy and Prosper	ous Commu	ınities		
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.		Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. Help to reduce inequalities in health. Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation.	0	The policy contains no specific requirements in relation to healthcare. A negligible effect is therefore likely.		
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the		Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. Help improve quality of life and address the opportunity for crime or anti-social behaviour	0	No specific requirements are made in the policy with regard to design considerations that could reduce crime or the fear of crime locally, and within the site itself. The requirement for a 1.8m high steel fence to prevent access		

SA Objective	Appraisal Question	SA Score	Justification
county.	through design measures.	<i>0,</i> 1, 0 0 0 1 0	to railway land should prevent potential issues with trespass
,	9.3 Encourage respect for people and the		on the railway and associated risks.
	environment.		,
10. Reduce poverty	10.1 Ensure easy and equitable access to and		The issues covered by this SA objective will not be directly
and promote	provision of services and opportunities, including		affected by the location of Traveller site options. A negligible
equality, social	jobs and learning, and avoid negative impacts on		effect is therefore likely.
inclusion by closing	different groups of people because of their		
the gap between the	ethnicity, gender, religion, disability, sexuality or		
most deprived areas in the county and the	age. 10.2 Enable the involvement of all affected parties,	0	
rest of the county.	including hard to reach groups.	U	
rest of the county.	10.3 Promote equality, fairness and respect for people		
	and the environment.		
	10.4 Address poverty and disadvantage, taking into		
	account the particular difficulties of those facing		
	multiple disadvantages.		
	Transport a	nd Access	
4. Reduce road traffic	4.1 Reduce the need to travel.		The policy requires a traffic management plan to be submitted
and congestion,	4.2 Promote more sustainable transport patterns in		to ensure that the number of turning movements into the site
pollution and	areas suffering from congestion,		across other traffic streams is minimised. Furthermore, there
accidents and	4.3 Improve the quality and/or provision of		are pedestrian and cycle links into Leominster from the site
improve health through physical	integrated transport options in areas of need and that are accessible to all.	+	where there is good access to services and facilities. Therefore, a minor positive effect is identified for this SA
activity by increasing	4.4 Increase the use of public transport, cycling and		objective.
the proportion of	walking.		objective.
journeys made by	4.6 Minimise risks associated with car travel.		
public transport,	The Thinning Hake associated with ear travell		
cycling and walking.			
6. Improve equality	6.1 Maintain or increase the type or quality of		The policy makes no specific provision with regard to equality
of access to and	facilities (including open space) in areas where		of access to facilities. It will therefore result in a negligible
engagement in	there is need, ensuring easy and equitable access		effect.
quality cultural,	by sustainable modes of transport.		
educational, leisure,	6.2 Promote Herefordshire's facilities to local people	0	
sporting, recreational	and tourists encouraging appreciation of the		
and community	heritage of the county and participation by all.		
activities for all.	6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport		
	and/or as a catalyst for urban and rural		
	and/or as a catalyst for urban and rural		

SA Objective	Appraisal Question	SA Score	Justification
j	regeneration.		
	The Built En	vironment	
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	 11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction. 11.6 Improve the wider built environment and sense of place. 	+	All Traveller site options will contribute towards meeting the identified need for Traveller sites in Herefordshire. The policy identifies this site as being for temporary stopping pitches, rather than longer-term occupation. This will assist the Travelling community in finding appropriate locations to stay while en route through the area, generating a positive effect – but does not provide housing as such.
19. Ensure integrated, efficient and balanced land use.	 19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials. 	0	The policy makes no specific provision in terms of balance of land uses. A negligible effect is therefore likely.
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	 20.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings. 20.2 Prevent development which is inappropriate in 	0	The policy makes no specific reference to the need to conserve and enhance the historic environment. As indicated in the site assessment, there may be potential for adverse effects on heritage assets. However, given the separation distances between the site and the River Meadows Conservation Area and several Grade II Listed Buildings (within 1km), it is likely that the landscaping scheme which includes retention of existing mature native trees will mitigate

SA Objective	Appraisal Question	SA Score	Justification
	scale, form or design to its setting or to its function or local area. 20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place? 20.4 Encourage cleanliness and/or improve the general appearance of the area.		any landscape and visual impact from the development. Therefore, a negligible effect is expected for this SA objective.
	Resource Consumption	and Climate	e Change
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	 12.1 Minimise the use of non re-usable materials. 12.2 Minimise waste from households, businesses etc. including hazardous waste. 12.3 Promote re-use, recovery and recycling of waste. 12.4 Deal with waste locally and/or through the best Practical Environmental Option. 	+	The policy has been updated to provide an area of hardstanding for temporary sanitation and waste management facilities to be brought on site when it is occupied and removed at the end of the stay. Therefore, a minor positive effect is identified for this SA objective.
14. Use natural resources and energy more efficiently.	 14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials. 14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build. 	0	The policy makes no reference to resource efficiency. (A significant negative effect is identified in the site assessment with regard to the loss of agricultural land. No policy response is available to mitigate this.)
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	 16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources. 16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation. 	0	The policy makes no references to management of GHG emissions. A negligible effect is therefore likely.

SA Objective	Appraisal Question	SA Score	Justification
	The Natural E	nvironment	l e e e e e e e e e e e e e e e e e e e
13. Value, maintain, restore and expand county biodiversity.	 13.1 Protect or enhance habitats of international, national, regional or local importance. 13.2 Protect international, national, regional or locally important terrestrial or aquatic species. 13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value. 13.5 Create new appropriate habitats. 	0	The policy requires that development would have no potential adverse impact on the River Lugg SSSI. It does not require enhancement, therefore only a neutral effect is possible.
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	 15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings. 15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users. 	+	The policy states that development should retain and where possible enhance existing semi mature native trees on site boundaries to mitigate landscape effects. Therefore a minor positive effect is identified.
17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	 17.1 Reduce flood risk both presently and taking into account climate change. 17.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 17.3 Include sustainable urban drainage systems where appropriate. 	+	According to the SA of the site, it is located entirely on greenfield land which is almost entirely within flood zones 2 and 3. However, the explanatory text accompanying the policy indicates that consultation with the Environment Agency confirmed that the site was not subject to this level of flood risk and advised that a sequential approach to the layout of the site may be required based on any further information regarding flood risk. The EA also advised that the site would require SuDS so as not to exacerbate the nearby flooding. The policy requires the design of the site to apply the principles of sustainable urban drainage systems and therefore a minor positive effect is expected for this SA objective as this would assist in reducing risk from surface water flooding on site.

SA Objective	Appraisal Question	SA Score	Justification
18. Minimise local and global pollution and protect or enhance environmental resources.	 18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution. 18.2 Protect and enhance the quality of watercourses. 18.3 Provide opportunities to improve soil quality or reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking. 18.5 Encourage the use of clean technologies and water minimisation techniques. 	0	The use of temporary sanitation facilities on site creates a pollution risk, particularly with regard to the proximity of the River Lugg. However, the policy has been revised to state that proposals should demonstrate that there would be no potential adverse impacts on the River Lugg SSSI.

Policy TS 8: Oakfields, Nashend Lane, Bosbury

SA Objective	Apr	oraisal Question	SA Score	Justification		
	Education and Employment					
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	1.2	Maintain or increase current employment rates in knowledge and technology intensive sectors. Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. Encourage fair and decent work conditions and increase median weekly earnings. Help to increase diversity of job opportunities.	0	The policy makes no provision in relation to employment, and will therefore have a negligible effect on this objective.		
2. Secure a more adaptable and higher skilled workforce.	2.2	Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. Reduce inequalities in skills across the county. Promote the voluntary sector, lifelong learning and life/environmental skills.	0	The policy will not have a direct effect on this SA objective. A negligible effect is therefore likely.		
8. Raise Educational achievements throughout the County	8.1	Ensure that education infrastructure meets projected future demand and need.	0	The policy contains no specific requirements with regard to educational provision. A negligible effect is therefore likely.		
		Healthy and Prosper	rous Commu	inities		
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage healthy living for all.		Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. Help to reduce inequalities in health. Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to physical sports, green space and recreation.	0	The policy contains no specific requirements in relation to healthcare. A negligible effect is therefore likely.		
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the		Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. Help improve quality of life and address the opportunity for crime or anti-social behaviour	0	The policy makes no specific reference to reduction of crime or fear of crime. It will therefore have a negligible effect.		

SA Objective	Appraisal Question	SA Score	Justification
county.	through design measures.		
•	9.3 Encourage respect for people and the		
	environment.		
10. Reduce poverty	10.1 Ensure easy and equitable access to and		The policy contains no specific measures with regard to
and promote	provision of services and opportunities, including		poverty reduction or social inclusion. A negligible effect is
equality, social	jobs and learning, and avoid negative impacts on		therefore likely.
inclusion by closing	different groups of people because of their		
the gap between the	ethnicity, gender, religion, disability, sexuality or		
most deprived areas	age.	•	
in the county and the	10.2 Enable the involvement of all affected parties,	0	
rest of the county.	including hard to reach groups.		
	10.3 Promote equality, fairness and respect for people and the environment.		
	10.4 Address poverty and disadvantage, taking into		
	account the particular difficulties of those facing		
	multiple disadvantages.		
	Transport ar	nd Access	
4. Reduce road traffic	4.1 Reduce the need to travel.		While this policy requires proposals to demonstrate
and congestion,	4.2 Promote more sustainable transport patterns in		appropriate and safe vehicular access as well as appropriate
pollution and	areas suffering from congestion,		turning space within the site which will minimise risks
accidents and	4.3 Improve the quality and/or provision of		associated with car travel, the site is not within or adjoining a
improve health	integrated transport options in areas of need and		main town and is not served by public transport. It is
through physical	that are accessible to all.	+/-	therefore likely to have a mixed effect on this SA objective.
activity by increasing	4.4 Increase the use of public transport, cycling and		
the proportion of	walking.		
journeys made by	4.6 Minimise risks associated with car travel.		
public transport,			
cycling and walking. 6. Improve equality	6.1 Maintain or increase the type or quality of		The policy makes no specific provision with regard to equality
of access to and	facilities (including open space) in areas where		of access to facilities. It will therefore result in a negligible
engagement in	there is need, ensuring easy and equitable access		effect.
quality cultural,	by sustainable modes of transport.		Circuit
educational, leisure,	6.2 Promote Herefordshire's facilities to local people		
sporting, recreational	and tourists encouraging appreciation of the	0	
and community	heritage of the county and participation by all.		
activities for all.	6.3 Promote the use of inland waterways for leisure,		
	recreation, telecommunication, freight transport		
	and/or as a catalyst for urban and rural		

SA Objective	Appraisal Question	SA Score	Justification
	regeneration.		
	The Built En	vironment	
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	 11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction. 11.6 Improve the wider built environment and sense of place. 	+	All Traveller site options will contribute towards meeting the identified need for Traveller sites in Herefordshire. The site will provide four additional residential pitches and therefore a minor positive effect is identified for this SA objective.
19. Ensure integrated, efficient and balanced land use.	 19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and materials. 	-	The policy makes no reference to balancing land uses. This site is located on mostly greenfield land, which represents a less efficient use of land than development on a previously developed site and is also not within or adjoining a main town. A minor negative effect is therefore likely.
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	 20.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings. 20.2 Prevent development which is inappropriate in 	-?	This policy is expected to have a minor negative effect as it does not contain any specific consideration of need to conserve heritage assets. As the site option is within 250m of a Grade II Listed Building in Pow Green and a number of other Grade II Listed Buildings are within 1km of the site, such as Nashend Farmhouse, a negative effect is likely although as the site is relatively well screened this effect is expected to be minor in nature.

SA Objective	Appraisal Question	SA Score	Justification
	scale, form or design to its setting or to its function or local area. 20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place? 20.4 Encourage cleanliness and/or improve the general appearance of the area.		
	Resource Consumption	and Climate	e Change
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	 12.1 Minimise the use of non re-usable materials. 12.2 Minimise waste from households, businesses etc. including hazardous waste. 12.3 Promote re-use, recovery and recycling of waste. 12.4 Deal with waste locally and/or through the best Practical Environmental Option. 	+	This policy will have a minor positive effect as it requires proposals to provide for waste collection arrangements.
14. Use natural resources and energy more efficiently.	 14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials. 14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the need for new build. 	0	The policy makes no reference to resource efficiency. (A significant negative effect is identified in the site assessment with regard to the loss of Grade 3 agricultural land. No policy response is available to mitigate this.) A negligible effect is therefore expected.
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources. 16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation. The Natural E	0	The policy makes no reference to management of GHG emissions. A negligible effect is therefore likely.

SA Objective	Appraisal Question	SA Score	Justification
13. Value, maintain, restore and expand county biodiversity.	 13.1 Protect or enhance habitats of international, national, regional or local importance. 13.2 Protect international, national, regional or locally important terrestrial or aquatic species. 13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value. 13.5 Create new appropriate habitats. 	0	The site makes no reference to protecting natural heritage assets (the nearest designated asset is a Local Wildlife Site within 1km of the site). It will therefore result in a negligible effect.
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	 15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings. 15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users. 	+	The policy requires proposals to provide for landscaping in accordance with policy TS1. The explanatory text states that the landscaping should be retained and opportunities for any enhancement explored. Therefore a minor positive effect is identified.
17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	 17.1 Reduce flood risk both presently and taking into account climate change. 17.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 17.3 Include sustainable urban drainage systems where appropriate. 	+	This site is located entirely on greenfield land, outside flood zone areas. The policy also requires proposals to provide details of the drainage strategy and therefore a minor positive effect is expected.
18. Minimise local and global pollution and protect or enhance environmental resources.	 18.1 Minimise water, air, soil, groundwater, noise and light pollution from current activities and the potential for such pollution. 18.2 Protect and enhance the quality of watercourses. 18.3 Provide opportunities to improve soil quality or reduce contaminated land. 18.4 Help achieve the objectives of Air Quality Management Plans through for e.g. increasing use of public transport, cycling and walking. 18.5 Encourage the use of clean technologies and water minimisation techniques. 	0	This site is not within or directly connected by road to an AQMA. A negligible effect is therefore likely on this SA objective.

Broad Location for Growth: Land in the vicinity of Stoney Street, Madley

SA Objective	Appraisal Question	SA Score	Justification
Education and Employment			
1. Support, maintain or enhance the provision of high quality, local or easily accessible employment opportunities, suited to the changing needs of the local workforce.	 1.1 Maintain or increase current employment rates in knowledge and technology intensive sectors. 1.2 Provide flexible employment land near to the workforce or provide opportunities easily accessible by public transport. 1.3 Encourage fair and decent work conditions and increase median weekly earnings. 1.4 Help to increase diversity of job opportunities. 	+?/-?	The broad location for growth is not within or adjoining a main town; however there are several bus stops in close proximity which may provide access to employment opportunities further afield. The area also contains a number of industrial estates, including Stony Street Industrial Estate and Dene Industrial Estate, which may provide employment opportunities. Therefore, depending on the exact location of any future site in the broad location for growth, an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.
2. Secure a more adaptable and higher skilled workforce.	 2.1 Provide or facilitate through investment, appropriate training and learning to help build, attract and retain a highly skilled workforce that meets existing and future needs. 2.2 Reduce inequalities in skills across the county. 2.3 Promote the voluntary sector, lifelong learning and life/environmental skills. 	0	The broad location for growth will not have a direct effect on this SA objective. A negligible effect is therefore likely.
8. Raise Educational achievements throughout the County	8.1 Ensure that education infrastructure meets projected future demand and need.	+?/-?	The broad location is within close proximity to a primary and secondary school. However, depending on the exact location of any future site, the schools may or may not be within reasonable walking distance (assumed to be 800m). Therefore an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.
Healthy and Prosperous Communities			
5. Improve the health of the people of Herefordshire, reduce disparities in health geographically and demographically and encourage	 5.1 Help to ensure there is adequate provision of healthcare services appropriate to local needs, which are accessible by sustainable modes of transport. 5.2 Help to reduce inequalities in health. 5.3 Encourage healthy lifestyles, e.g. reducing car use and maintaining or enhancing access to 	+?/-?	The broad location is within close proximity to a GP surgery in Kingstone, several Public Rights of Way and areas of open space. However, depending on the exact location of any future site, the GP surgery, PRoWs and open spaces may or may not be within reasonable walking distance (assumed to be 800m). Therefore, an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.

SA Objective	Appraisal Question	SA Score	Justification
healthy living for all.	physical sports, green space and recreation.	0.10010	
9. Reduce and prevent crime/fear of crime and antisocial behaviour in the county.	 9.1 Enhance community safety, security and reduce crime or fear of crime and anti-social behaviour. 9.2 Help improve quality of life and address the opportunity for crime or anti-social behaviour through design measures. 9.3 Encourage respect for people and the environment. 	0	The issues covered by this SA objective will not be directly affected by where the broad location of growth is situated and would depend on factors such as the incorporation of green space and the use of appropriate lighting. A negligible effect is therefore likely on this SA objective.
10. Reduce poverty and promote equality, social inclusion by closing the gap between the most deprived areas in the county and the rest of the county.	 10.1 Ensure easy and equitable access to and provision of services and opportunities, including jobs and learning, and avoid negative impacts on different groups of people because of their ethnicity, gender, religion, disability, sexuality or age. 10.2 Enable the involvement of all affected parties, including hard to reach groups. 10.3 Promote equality, fairness and respect for people and the environment. 10.4 Address poverty and disadvantage, taking into account the particular difficulties of those facing multiple disadvantages. 	0	The issues covered by this SA objective will not be directly affected by where the broad location of growth is situated. A negligible effect is therefore likely on this SA objective.
	Transport a	nd Access	
4. Reduce road traffic and congestion, pollution and accidents and improve health through physical activity by increasing the proportion of journeys made by public transport, cycling and walking.	 4.1 Reduce the need to travel. 4.2 Promote more sustainable transport patterns in areas suffering from congestion, 4.3 Improve the quality and/or provision of integrated transport options in areas of need and that are accessible to all. 4.4 Increase the use of public transport, cycling and walking. 4.6 Minimise risks associated with car travel. 	+?/-?	Land in the vicinity of Stoney Street is not within or adjoining a main town; however there are several bus stops situated in close proximity which may encourage sustainable travel. The Inspector's Report at Examination stage identified that there is an issue with safe vehicular access with commercial vehicles entering and leaving the Stoney Street Industrial Estate which may affect potential sites in the vicinity of Stoney Street. Therefore, a mixed effect (uncertain minor positive/uncertain minor negative) is expected for this SA objective. The effect is uncertain as it is not identified as a site allocation but as a possible broad location for growth in the medium term (2023-2028) and therefore the exact location and the deliverability of a future site is uncertain.

SA Objective	Appraisal Question	SA Score	Justification
6. Improve equality	6.1 Maintain or increase the type or quality of	SA Score	The broad location is not within or adjoining a main town but
of access to and engagement in quality cultural, educational, leisure, sporting, recreational and community activities for all.	facilities (including open space) in areas where there is need, ensuring easy and equitable access by sustainable modes of transport. 6.2 Promote Herefordshire's facilities to local people and tourists encouraging appreciation of the heritage of the county and participation by all. 6.3 Promote the use of inland waterways for leisure, recreation, telecommunication, freight transport and/or as a catalyst for urban and rural regeneration.	+?/-?	is within close proximity to several areas of open space and bus stops which would enable access to services and facilities further afield. However, depending on the exact location of any future site, the areas of open space and bus stops may or may not be within reasonable walking distance (assumed to be 800m). Therefore, an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.
	The Built En	vironment	
11. Provide everyone with the opportunity to live in good quality, affordable housing of the right type and tenure, in clear, safe and pleasant local environments.	 11.1 Increase access to good quality housing meeting people's needs (e.g. tenure, aspirations, location, affordability, size and type, accessible to disabled people). 11.2 Increase the supply of affordable housing. 11.3 Reduce the percentage of unfit homes/empty homes. 11.4 Improve the energy and resource efficiency of homes and reduce fuel poverty and ill-health. 11.5 Increase the use of sustainable design techniques, improve the quality of housing and use sustainable building materials in construction. 11.6 Improve the wider built environment and sense of place. 	+?	The broad location for growth may provide accommodation for Travellers if developed, however, the deliverability of any future site in this area is uncertain.
19. Ensure integrated, efficient and balanced land use.	19.1 Ensure new developments are in appropriate locations, optimising the use of previously developed land and buildings, primarily focussed on the urban areas and are accessible by walking, cycling or sustainable transport and/or will increase the share of these transport modes, thereby reducing the need to travel. 19.2 Encourage an appropriate density and mix of uses using sustainable resource-efficient design. 19.3 Promote ways of meeting local needs locally by encouraging local sourcing of food, goods and	+?/-?	Land in the vicinity of Stoney Street comprises a mix of previously developed land and greenfield sites. Depending on the exact location of any future site in the broad location for growth, this may or may not represent an efficient use of land. Therefore, an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.

SA Objective	Appraisal Question	SA Score	Justification
	materials.	0.1.000.0	2.00.111.00.11.0011
20. Value, protect and enhance the character and built quality of settlements and neighbourhoods and the county's historic environment and cultural heritage.	 20.1 Conserve, protect and enhance designated and undesignated heritage assets in a manner appropriate to their significance, including Conservation Areas, Listed Buildings, archaeological remains, and areas of historical heritage and cultural value e.g. locally listed buildings. 20.2 Prevent development which is inappropriate in scale, form or design to its setting or to its function or local area. 20.3 Encourage development that creates and sustains well-designed, high quality built environments that incorporate green space, encourage biodiversity and promote local distinctiveness and sense of place? 20.4 Encourage cleanliness and/or improve the general appearance of the area. 	0?	There are no designated heritage assets within close proximity of the broad location for growth. A negligible effect is therefore likely on this SA objective, although as effects will depend on factors relating to the exact location and design of the site, which are unknown at this stage, this is uncertain.
	Resource Consumption	and Climate	e Change
12. Reduce the amount of waste requiring disposal and minimise the use of non-reusable materials and encourage recycling.	 12.1 Minimise the use of non re-usable materials. 12.2 Minimise waste from households, businesses etc. including hazardous waste. 12.3 Promote re-use, recovery and recycling of waste. 12.4 Deal with waste locally and/or through the best Practical Environmental Option. 	0	Effects on waste generation and levels of recycling will depend on the onsite practices of residents and not the location of the sites. Therefore, a negligible effect is likely on this SA objective.
14. Use natural resources and energy more efficiently.	 14.1 Maximise energy efficiency and minimise the consumption of non-renewable energy i.e. from fossil fuels. 14.2 Minimise the consumption of water, land, soil, minerals, aggregates and other raw materials by all? E.g. through integrated transport, sustainable resource-efficient design, local sourcing of food, goods, materials. 14.3 Encourage the re-use/enhancement (to high standards of sustainable resource-efficient design) of existing buildings and minimise the 	+?/-?	Land in the vicinity of Stoney Street comprises Grade 2 and 3 agricultural land which, depending on the exact location of any future site in the broad location of growth, may result in the loss of high quality agricultural land. However, there are also areas of previously developed land in the broad location for growth, which if developed, would not result in the loss of high quality agricultural land. Therefore, an uncertain mixed effect (minor positive/minor negative) is expected for this SA objective.

SA Objective	Appraisal Question	SA Score	Justification
SA Objective	need for new build.	SA SCOLE	Justification
16. Reduce Herefordshire's vulnerability to the impacts of climate change as well as its contribution to the problem.	16.1 Reduce the county's contribution to climate change by reducing greenhouse gas emissions from transport, domestic, commercial and industrial sources. 16.2 Increase the proportion of energy generated from renewable and low carbon sources including by micro-generation, Combined Heat and Power (CHP), district heating and in transportation.	0	Levels of greenhouse gas emissions from built development will not be influenced by where the broad location for growth is situated, but rather will depend on design and onsite practices. A negligible effect on this SA objective is therefore likely.
	The Natural E	nvironment	
13. Value, maintain, restore and expand county biodiversity.	 13.1 Protect or enhance habitats of international, national, regional or local importance. 13.2 Protect international, national, regional or locally important terrestrial or aquatic species. 13.3 Maintain wildlife corridors and minimise fragmentation of ecological areas and green spaces. 13.4 Manage access to sites in a sustainable way that protects or enhances their nature conservation value. 13.5 Create new appropriate habitats. 	-?	Land in the vicinity of Stoney Street is located in close proximity to several Local Wildlife Sites and SSSIs. Overall, a minor negative effect is likely. This is uncertain, however, and will depend on the location of any future site in the broad location for growth and also as appropriate mitigation may avoid adverse effects and could result in beneficial effects.
15. Value, protect, enhance and restore the landscape quality of Herefordshire, including its rural areas and open spaces.	 15.1 Value, enhance and protect natural environmental assets including AONB's, historic landscapes, open spaces, parks and gardens and their settings. 15.2 Encourage local stewardship of local environments, for example by promoting best practices in agricultural management. 15.4 Promote the use of rural areas and open space by all, encourage easy non-car based access, and accommodate the needs of disabled users. 	0	Land in the vicinity of Stoney Street is in an area of low landscape sensitivity; therefore a negligible effect is likely on this SA objective.
17. Reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment. 18. Minimise local	 17.1 Reduce flood risk both presently and taking into account climate change. 17.2 Prevent inappropriate development of the floodplain, and include flood protection systems. 17.3 Include sustainable urban drainage systems where appropriate. 18.1 Minimise water, air, soil, groundwater, noise and 	0?/-?	Land in the vicinity of Stoney Street is generally not within a flood zone; however, there are areas at risk from fluvial flooding. Depending on the exact location of any future site in the broad location for growth, this may or may not be at risk of flooding. Therefore, an uncertain mixed effect (negligible/minor negative) is expected for this SA objective. Land in the vicinity of Stoney Street is not within or directly

SA Objective	Appraisal Question	SA Score	Justification
and global pollution and protect or	light pollution from current activities and the potential for such pollution.		connected by road to an AQMA. However, due to the proximity to the Stoney Street industrial estate, there may be noise
enhance	18.2 Protect and enhance the quality of watercourses.		pollution impacting on residents of any future site in the broad
environmental resources.	18.3 Provide opportunities to improve soil quality or reduce contaminated land.		location for growth. The effect is uncertain as it is not identified as a site allocation but as a possible broad location
resources.	18.4 Help achieve the objectives of Air Quality		for growth in the medium term (2023-2028) and therefore the
	Management Plans through for e.g. increasing		exact location and the deliverability of a future site is uncertain.
	use of public transport, cycling and walking. 18.5 Encourage the use of clean technologies and		uncertain.
	water minimisation techniques.		