

**South Worcestershire  
Traveller and Travelling Showpeople  
Policy and Site Allocations  
Development Plan Document  
Publication: Regulation 19 Stage**

**Equalities Impact Assessment**

**September 2022**



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## 1. Introduction

- 1.1 The purpose of this Equalities Impact Assessment (EqIA) is to examine the content of the South Worcestershire Travellers and Travelling Showpeople Policies and Site Allocations Development Plan Regulation 19 Publication version in terms of its likely impact on different community groups and how the needs of such groups have been taken into account in the evolution of the DPD policies. Therefore, the main question for this EqIA is:

**“Does the South Worcestershire Travellers and Travelling Showpeople Site Allocations DPD have the potential to cause adverse impact on or unlawfully discriminate against any groups in the community”?**

## 2. Background to the Travellers DPD

- 2.1 The South Worcestershire Travellers and Travelling Showpeople Site Allocations Development Plan Document (the Travellers DPD) sets out a strategy to deliver sufficient traveller and travelling showpeople sites to meet identified needs by safeguarding existing sites in addition to identifying specific traveller sites and setting out criteria for their development and future safeguarding to 2033.
- 2.2 National planning policy as set out in the 2021 National Planning Policy Framework (NPPF) and more specifically guidance in the Planning Policy for Travellers Sites (2015) requires local authorities to assess the accommodation requirements of travellers and to develop a strategy that addresses any unmet identified need.
- 2.3 Since the last public consultation (Preferred Options, 2021), officers met with the Planning Inspectorate on a scheduled advisory meeting designed to provide advice on this plan making process. The Inspector noted the delay of the South Worcestershire Development Plan Review and advised that the Traveller and Travelling Showpeople DPD should also seek to update Policy SWDP17: Travellers and Travelling Showpeople. The DPD will therefore include the main policy (an update of SWDP17 which will be removed from the SWDPR), the design guidance and the allocations. The 2021 Local Development Scheme (LDS), covering the South Worcestershire Councils (SWC) of Worcester City, Malvern Hills and Wychavon District Councils sets out a requirement and timetable for the delivery of the Travellers DPD, in support of SWDP17, to identify and allocate sufficient sites to meet the identified need in the latest Gypsy Travellers Accommodation Assessment (GTAA). An update to the LDS is scheduled for late 2022/early 2023 in order to reflect the latest project timetable.

- 2.4 The Regulation 18 Traveller DPD Revised Preferred Options was published for consultation between 17 May to 5 July 2021. The Regulation 19 version of the plan is published for six weeks consultation from 1 November 2022. Therefore, this is an appropriate stage at which to undertake an EqIA on the final draft sites and policies in the DPD. The EqIA is available on the SWDP website as part of the consultation. This will allow any recommendations from this report and feedback from the consultation to be submitted for examination to the Planning Inspectorate in early 2023.
- 2.5 Further to the Publication version consultation, and following an update to the LDS, the next key stage for the Travellers DPD is the Submission to the Planning Inspectorate. The examination will be later in 2023.

### 3. Equality Guidance

- 3.1 The SWC are subject to a legal requirement to carry out what is referred to as the public sector equality duty. This is set out in the Equalities Act 2010 and states that public bodies must, in carrying out their functions, have **due regard** to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
  - Advance equality of opportunity between people who share a protected characteristic and those who do not; and
  - Foster good relations between people who share a protected characteristic and those who do not.
- 3.2 The Equality Act explains that the second aim (advancing equality of opportunity) involves having due regard to the need to:
- Remove or minimise disadvantages suffered by people due to their protected characteristics;
  - Take steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; and
  - Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.
- 3.3 People and individuals who are protected under the Equalities Act have protected characteristics which are:
- age

- disability
- gender reassignment (transgender)
- marriage and civil partnership
- pregnancy and maternity
- race
- religion and belief
- sex (gender)
- sexual orientation

#### 4. Equality and Planning

4.1 Targeted advice on improving planning outcomes for the community is set out in ‘Equality and Diversity’ produced by the Planning Advisory Service (PAS) in partnership with Improvement and Development Agency for local government (I&DeA). This focuses on the aspects of:

- Evidence gathering
- Plan-making
- Community engagement
- Development Management
- Employment and training

4.2 The PAS advice sets out particular issues in regard to plan-making, advising that there are certain steps that local authorities must undertake if they are to succeed in mainstreaming equality. Table 1 below illustrates how these apply to the Traveller DPD.

**Table 1: How the DPD Addresses Equality**

<b>PAS/I&amp;DeA Advice</b>	<b>SW Traveller DPD</b>
Understand the demographics of the area served, together with the needs and aspirations of the communities that live there.	The DPD preparation is underpinned by detailed demographic evidence of the area. The plan is informed by the Worcestershire Gypsy & Traveller Accommodation Assessment (GTAA) published in October 2019.
Ensuring inclusive consultation	Consultation on draft documents and

methods and targets if necessary, of previously excluded groups.	evidence base via a variety of means, including the SWC websites, local press, Local Plan database mail out, briefings for parish and town councils, local residents and the wider public.
Take clear steps to promote equality in plans.	The SWC corporate strategies, Statement of Community Involvement, Sustainability Appraisals.
Assess who is benefiting from existing plans and develop systems to reconcile issues revealed through the analysis of data.	As above. The Traveller DPD attempts to balance benefits to travellers with the needs of the wider community.
Use influence to ensure private developers and other stakeholders do the same.	As above. A variety of consultation techniques have been utilised to encourage participation.
Set specific equality objectives.	The SWC corporate strategies and this EqIA. The DPDs (i.e. the SWDP and the emerging Traveller DPD) also set local targets for pitch provision to meet an identified need.
Monitor plans through data collection, engagement, and feedback.	The Traveller DPD has a monitoring framework built in. The planning applications process provides this data on an ongoing basis.

## 5. South Worcestershire Councils Corporate and Equality Policies

- 5.1 Malvern Hills District Council has produced an Equality Scheme incorporated within a Five Year Plan adopted in 2021. The purpose of the scheme is to set out how the council intends to promote equality of opportunity and eradicate discrimination in the delivery of public services and in its actions as an employer through meeting the statutory responsibility and addressing the needs of all who face inequality and discrimination.
- 5.2 Worcester City Council adopted a new Equality, Diversity and Inclusion Strategy in 2022. The strategy sets out Worcester City Council's commitment to increasing equality, providing better opportunities inside the organisation, within our services and in the wider City, recognising that diversity and inclusion can deliver better outcomes for everyone. The council is committed

to promoting and supporting good relations and cohesion between all communities in the City so that everyone feels welcome and safe in Worcester and can benefit from the different perspectives and experiences of different groups.

5.3 Wychavon District Council seeks to address the relevant aspects of the Equality Act 2010 through the district council's corporate 2020 four year strategy which includes the strategic priority of **strong communities**. The following goals are set under this policy to promote equality:

- Target services and support to those who need them most.
- Provide great value services.
- Listen to communities and to support people play an active role in their communities.

## **6. EqIA of the Regulation 19 Traveller DPD Publication version**

6.1 The Traveller DPD has been produced to address the needs of travellers and travelling showpeople who may be considered a disadvantaged and discriminated group or race (EHRC, 2017 'Gypsies and Travellers: simple solutions for living together'). The DPD therefore aims to have a positive effect on a group containing the protected characteristics as outlined below:

- In addressing the particular needs of travellers and travelling showpeople the DPD is promoting equality.
- By involving the travelling community directly in the initial assessment of needs and provision of subsequent policies and site allocations the DPD is encouraging the participation of these groups.
- The development of appropriate policies for travellers which provides for their accommodation needs, whilst protecting the surrounding environment and limiting impacts on the wider community, should have positive effects on promoting good relations.

6.2 The assessment for each of the protected characteristics is set out below for the Travellers DPD and reveals that the majority of the categories score positively or are not applicable. As the DPD is a land use planning document, its scope is limited to planning for Travellers and Travelling Showpeople. The DPD does not therefore attempt to deal with all sections of the community, nor all types of land use.

6.3 The preparation of the DPD has been subject to consultation with both travellers and the wider community. In March 2016 a first version of the Preferred Options was published for six weeks public consultation.

Subsequently, the SWC undertook a further call for sites over 2016/17 in order to identify additional numbers of potential allocations sites. A further key change that has influenced the preparation of this DPD was the change in definition of 'travellers' as now specified in the Governments' guidance of August 2015, this required the SWC to consider possible implications for the Gypsy And Traveller Accommodation Assessment (GTAA) which was originally undertaken in 2014 in an Addendum, published in 2016. The PPTS requires Local Planning Authorities to set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area. The NPPF requires assessment of housing needs of different groups, including Travellers, but clarifies that the needs of Travellers who accord with PPTS Annex A should be assessed in accordance with the PPTS. There is therefore a distinction in terms of the approach to plan-making for Travellers who accord with the definition in PPTS Annex A and those who do not. As a result a new GTAA was published in October 2019

- 6.4 A revised Preferred Options consultation seeking views on requirements for traveller sites was undertaken in February 2018. A further revised Preferred Options consultation seeking views on requirements for traveller sites was undertaken in May 2021.
- 6.5 The Regulation 19 Publication version of the Traveller DPD will be released for six week consultation on 1 November and December 2022. The results of the consultation will be analysed in relation to the SWC equality duties and also to ensure wide community representation and involvement. In addition, the final draft policies and site allocations, and reasonable alternative options for the Publication version have also been assessed in a final Sustainability Appraisal report which includes references to building communities through the promotion of social inclusion; providing good quality accommodation for all; and improving the health and wellbeing of all which address some of the equality issues.

## **7. Screening Assessment of Traveller DPD**

- 7.1 Table 2 appended screens each of the DPD policies against the equality groups listed in Table 1.
- 7.2 In addition to a broad score using the following symbols, the commentary notes any key issues and suggests actions to be taken when considering the detailed expression of policies and supporting text when finalising the submitted DPD.
- 7.3 The following key has been used to record the overall impact of each policy.



+ve	Positive impact
?	Neutral/don't know/unsure/negligible impact
- ve	Negative impact
n/a	Not applicable

## 8. Summary and Conclusion

- 8.1 The screening assessment has not revealed any significant deficiencies in the expression of the policies and proposals in the South Worcestershire Traveller and Travelling Showpeople Policies and Site Allocations DPD Publication Regulation 19 version in relation to equality matters. There are significant positive effects on the travelling community as a result of the proposed policies in the document. The scoping assessment has revealed some positive effects on other protected characteristics, particularly addressing the predominate needs of living in a rural area. Other positive effects may also occur on characteristics related to poverty and low income where these may be evident within the Traveller and Travelling Showpeople communities. The DPD also addresses the need of particular age groups within the communities by taking account of issues such as concealed households and future household formation. The DPD is required to meet the needs of Travellers who meet the definition in PPTS Annex A but the south Worcestershire's councils aim is to meet all Travellers needs in accordance with the Housing and Planning Act (2016)..
- 8.2 Given the specific scope of the nature of the document, the DPD does not have particular impacts on many of the protected characteristics. The DPD makes no reference to most of the characteristics and hence many of the scores are either neutral or not applicable.
- 8.3 It is recognised that some of the sites are not in ideal locations in relation to proximity to larger settlements and that this may affect the potential to access facilities and services. In particular, this could adversely impact on the young, the elderly, those with health problems or disabilities and those on low incomes without access to transport. However, as the DPD makes clear having undertaken a thorough call for sites exercise there are a lack of alternative sites coming forward for consideration in the DPD. Therefore, it has been necessary to focus on those sites that are available and considered to be deliverable.
- 8.4 The need to provide authorised sites for traveller accommodation needs is of great importance, including in regard to the right of children to a decent home.

Given the level of identified need and the sites available, it has not been possible to select a range of sites, as sites have to be deliverable. The sites allocated have therefore been given a positive score in the screening as they are providing much needed accommodation.

- 8.5 The Traveller DPD is specifically aimed at providing planning policy guidance on meeting the accommodation needs for this often disadvantaged group in society and therefore no recommendations are considered necessary to the policies to improve their effect on equalities characteristics. Nevertheless, any representations to the Publication version on equalities matters will be considered by the Inspector examining the DPD.

**Appendix 1: Table 2: Assessment Template**

PROTECTED CHARACTERISTIC	SUB-GROUP	DISCRIMINATION & DISADVANTAGE			PROMOTING EQUALITY & PARTICIPATION			PROMOTING GOOD RELATIONS			REASONING & EVIDENCE
		+VE	-VE	N/A	YES	No	N/A	YES	NO	N/A	
<b>SEX (GENDER)</b>	Women	Y			Y			Y			<p>The policies included in the Traveller DPD do not make any distinction between genders.</p> <p>This DPD has a positive effect on women as a disadvantaged group insofar as part of the assessment of the needs of all travellers and their families and the DPD aims to accommodate the identified needs.</p> <p>The provision of a safe and secure environment accessible by all and safe and secure routes to and around sites. These references protect against particular kinds of crimes disproportionately impacting men/women.</p>
	Men	Y			Y			Y			
<b>AGE</b>	Over 80	Y			Y			Y			<p>The Gypsy and Traveller Accommodation Assessment (GTAA) fully assessed the needs for accommodation of all</p>
	Over 65	Y			Y			Y			
	22-64	Y			Y			Y			

	16 to 21	Y			Y			Y			<p>travellers through interviews and surveys as part of the GTAA methodology. These assessed the needs of individuals as well as groups and families. As such it included considering the demographics of travellers on particular sites and their anticipated needs, including an assessment of likely new household formation over the plan period.</p> <p>The DPD addresses the needs of older people who may have ceased travelling, but still need to be accommodated.</p> <p>The needs of children and younger people have also been taken account in the DPD, in respect of promotion of locations near settlements and schools. The criteria for site development provide for a safe physical environment and makes for provision of play areas where appropriate.</p> <p>However, it is acknowledged not all existing sites are ideally located in terms of access to facilities, which may</p>
	Under 16	Y			Y			Y			

											adversely impact on school age children and the less mobile.
<b>RACE</b>	White British People			Y			Y			Y	The DPD directly addresses the needs of travellers and makes no attempt to distinguish between the variables of travelling groups, e.g, Romany gypsies, Irish travellers etc.). This is in accordance with the Planning Policy for Traveller Sites (2015) which states: "persons of nomadic habit of life whatever their race or origin". The plan also provides a framework and strategy and making decisions on development in such a way to integrate sites within the settled community.
	White European or Other White People			Y			Y			Y	
	Irish People			Y			Y			Y	
	Black or Black British People			Y			Y			Y	
	Asian or Asian British People			Y			Y			Y	
	Chinese or Chinese British People			Y			Y			Y	
	Mixed Race People			Y			Y			Y	
	Travellers	Y			Y			Y			
	People from other minority ethnic			Y			Y			Y	

	groups										
<b>DISABILITY &amp; HEALTH</b>	Physical Impairment	Y			Y			Y			The Traveller DPD makes no distinction between these matters.
	Sensory Impairment	Y			Y			Y			
	Long-Term Health Problem	Y			Y			Y			
	Mental Illness	Y			Y			Y			
	Learning Disability	Y			Y			Y			
<b>SEXUAL ORIENTATION</b>	Lesbians			Y			Y			Y	The Traveller DPD makes no distinction between these groups.
	Gay Men			Y			Y			Y	
	Bisexuals			Y			Y			Y	
<b>RELIGION &amp; BELIEF</b>	Faith Groups			Y			Y			Y	The Traveller DPD makes no distinction between these groups.
	Atheist, Agnostic or Other belief			Y			Y			Y	
<b>TRANSGENDER</b>				Y			Y			Y	The Traveller DPD makes no distinction between these groups.
<b>MARRIAGE &amp;</b>	Married			Y			Y			Y	The Traveller DPD makes no

<b>CIVIL PARTNERSHIP</b>	Civil Partners			Y			Y			Y	distinction between these groups.
<b>PREGNANCY &amp; MATERNITY</b>	Pregnant			Y			Y			Y	The Traveller DPD makes no distinction between these groups.
	On Maternity Leave			Y			Y			Y	
<b>OTHER</b>	Living in rural area	Y			Y			Y			All the sites considered within the Traveller DPD are principally within rural areas. Site assessments and individual site Sustainability Appraisals have been undertaken to attempt to ensure that sites are located where travellers can access the services of local facilities, particularly education, whilst having regard to the existing locations of current sites.
	Poor literacy &/or numeracy	Y			Y			Y			Although the Traveller DPD does not make specific reference to these groups, the assessment of the needs of the travelling community included the needs of those who were not travelling, either by age, disability etc. The DPD does make some allowance for accommodation needs of these groups as part of the wider traveller community.
	Unemployed	Y			Y			Y			By providing for the needs of
	Low Income	Y			Y			Y			

On benefits	Y			Y			Y			travellers and their family groups, the DPD may have positive effects on some of the income and poverty-related characteristics as the travelling community are disproportionately represented in these groups.
Caring role	Y			Y			Y			



### Appendix 1: Table 3: Assessment Analysis

<b>Name of the Service, Policy, or Strategy:</b>	<b>South Worcestershire Traveller and Travelling Showpeople Site Allocations DPD</b>
<b>Element(s) of the above being assessed.</b>	Whole document
<b>Date Screening undertaken:</b>	2022
<b>Screeners:</b>	South Worcestershire Planning Officers
<b>File name and location:</b>	
<b>Question</b>	
<b>1. What is the main purpose of the Service, Strategy, Policy, Practice or Procedure?</b>	Development Plan Document for the South Worcestershire Councils for the plan period 2019 - 2033. Sets out the allocation of sites for traveller requirements and policies to be applied during consideration of planning applications, in accordance with Town and Country Planning (Local Development) (England) Regulations 2012; National Planning Policy Framework 2021 and Planning Policy for Traveller Sites 2015.
<b>2. List the main activities of the Service, Strategy, Policy, Practice or Procedure.</b>	To set out the amount, type and location of sites for travellers in south Worcestershire and to include a series of detailed policies to determine planning applications against.
<b>3. See table above</b>	As above.
<b>4. Have you identified any impact(s) on any group(s)?</b>	Yes. The policies in the Travellers DPD have a positive impact on Traveller and Travelling Showpeople groups. There are also positive impacts in relation to disabilities and age, rural living, and income related poverty.
<b>5. Is the Service, Strategy, Policy, Project, Practice or Procedure promoting equality of opportunity and/or participation in public life for any group(s)?</b>	Yes. The travelling community has been interviewed specifically to identify their needs for accommodation that the DPD has been produced to address (GTAA, 2019).

	The Traveller DPD Publication version is subject to a consultation of six weeks from 1 November 2022.
<b>6. Can it be improved to do so?</b>	No see above.
<b>7. Is the Service, Strategy, Policy, Project, Practice or Procedure promoting good relations for any group(s)?</b>	Yes. The Traveller DPD is aimed at accommodating the needs of Travellers in a way that has acceptable impacts on the wider community and environment. Better planning of traveller sites should assist in promoting good relations.
<b>8. Have you gathered any new equality information during this assessment?</b>	No. The GTAA surveys of the travelling community to inform the Traveller DPD identified the characteristics of the respondents as relevant.
<b>9. Have you undertaken any consultation/engagement work during this assessment?</b>	There has not been any specific consultation undertaken in relation to the EqIA. However extensive consultation has been undertaken on the initial Preferred Options for the DPD in the spring of 2016, then in 2018 and continued with the revised draft of the Preferred Options consultation from May to July 2021. This has been fed back into the assessment on an ongoing basis.

Appendix 1: Table 4: Screening of DPD Site Allocations & Policies

Section	Equality Group											Summary/ commentary
	Gender	Age	Race	Disability and health	Sexuality	Religion and belief	Transgender	Marriage and civil partnership	Pregnancy and maternity	Low income	Living in a rural area	
<b>Proposed Site Allocations</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	<p>By allocating new sites to meet the identified need this policy has a very positive effect on the race characteristic by addressing the needs of travellers directly.</p> <p>As outlined in the scoping assessment, there are positive effects of providing specifically for the needs of travellers in respect of the protected characteristics of age, disability and health, and low income as these aspects may impact disproportionately on the travelling community. The sites are principally within the rural area, so the policy has a</p>

Section	Equality Group											Summary/ commentary
	Gender	Age	Race	Disability and health	Sexuality	Religion and belief	Transgender	Marriage and civil partnership	Pregnancy and maternity	Low income	Living in a rural area	
												positive impact in respect of this.
<b>Delivery of Travelling Showpeople sites</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	The 2019 GTAA identifies the need for 10 plots for Travelling Showpeople over the period to 2033. It is anticipated that the site at Rushwick allocated in the SWDPR, will meet their needs.

Section	Equality Group											Summary/ commentary
	Gender	Age	Race	Disability and health	Sexuality	Religion and belief	Transgender	Marriage and civil partnership	Pregnancy and maternity	Low income	Living in a rural area	
<b>The Paddocks, Newlands</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy allocates land specifically for Gypsies and Travellers, therefore this has a very positive effect on the race characteristic by addressing this groups accommodation needs directly.

Section	Equality Group											Summary/ commentary
	Gender	Age	Race	Disability and health	Sexuality	Religion and belief	Transgender	Marriage and civil partnership	Pregnancy and maternity	Low income	Living in a rural area	
<b>Blossom Hill, Village Street, Aldington</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy allocates land specifically for Gypsies and Travellers. Therefore ,this has a very positive effect on the race characteristic by addressing this groups accommodation needs directly.
<b>Knowle Hill, Evesham</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy allocates land specifically for Gypsies and Travellers, therefore this has a very positive effect on the race characteristic by addressing this groups accommodation needs directly.

<b>The Hill, Canada Bank, Charlton</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy allocates land specifically for Gypsies and Travellers. Therefore, this has a very positive effect on the race characteristic by addressing this groups accommodation needs directly.
<b>Policy T1: Meeting the Needs of Travellers and Travelling Showpeople</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	n/a	+ve	+ve	The policy sets out a strategy for allocating sites against an identified need determined through the 2019 GTAA. In so doing it helps meet the needs, requirements and aspirations of both the traveller and travelling showpeople communities. The policy puts in place criteria for determining planning applications on allocated sites, and windfall sites. The policy provides a framework to deliver appropriate accommodation and infrastructure. The process provides an open, transparent and accountable approach to delivering development for both the traveller and settled communities.

<b>Policy T2 Traveller Site Allocations</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy allocates the 4 sites, referred to above, outside of the strategic allocations.
<b>Policy T3: Design of Traveller Sites and Travelling Showpeople Yards</b>	n/a	+ve	+ve	+ve	n/a	n/a	n/a	n/a	n/a	+ve	+ve	This policy provides specific design advice for the design and layout of pitches and yards. In so doing it meets the needs of residents in providing a better quality and accessible environment for users, visitors, and neighbours alike.



