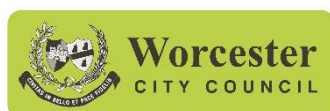


**South Worcestershire Traveller and Travelling Showpeople Policy and Site
Allocations Development Plan Document**

Habitats Regulations Assessment Screening Report

October 2022



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1. Summary

- 1.1 This screening report is intended to identify Habitats sites which could possibly be affected by the south Worcestershire Councils' Traveller and Travelling Showpeople Policy and Site Allocations Development Plan Document (DPD). A Regulation 19 draft version of the DPD has been prepared and will be available for public consultation for six weeks from 1st November. Previous versions of Habitats Regulations Assessment (HRA) screening for the DPD have been published in February 2018 and May 2021. They have screened potential Traveller and Travelling Showpeople sites. This version of the DPD HRA screening considers the selected Traveller and Travelling Showpeople Site Allocations within the Regulation 19 draft DPD.
- 1.2 The DPD follows on from the South Worcestershire Development Plan (SWDP) which was adopted in February 2016. HRA was first undertaken for the SWDP in August 2008 and updates were undertaken throughout the preparation of the SWDP. The HRA Screening Report for the SWDP concluded that a full Appropriate Assessment was required and reports were published in September 2011, July 2012 and November 2012. Natural England was involved throughout the process.
- 1.3 This HRA Screening Report concludes that the Traveller and Travelling Showpeople DPD will not have any significant effects on Habitats Sites.

2. Introduction

- 2.1 South Worcestershire is the area covered by the districts of Malvern Hills, Wychavon and the City of Worcester. The area is not a formal sub region or an administrative area but the three Councils - Malvern Hills District Council, Worcester City Council and Wychavon District Council - have chosen to work jointly in the preparation of the SWDP, and subsequent planning policy documents, given the strong functional, economic, infrastructure, policy and cross boundary relationships between the local authorities.
- 2.2 This report presents the findings of the HRA screening of the South Worcestershire Councils' Traveller and Travelling Showpeople Policies and Site Allocations DPD. The findings of the HRA screening have informed the parallel Sustainability Appraisal (SA). ClearLead Consulting Limited have been appointed to review the SA, acting as a 'critical friend' to the Councils. ClearLead Consulting Limited have also reviewed and updated this HRA screening report in September 2022.

3. Background

- 3.1 The Conservation of Habitats and Species Regulations (as amended) 2017¹ [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance.
- 3.2 The Habitats Regulations transpose the requirements of the European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna [the Habitats Directive] which aims to protect habitats and species of European nature conservation importance. The Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Habitats Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) which are designated under European Directive (2009/147/EC) on the conservation of wild birds [the Birds Directive]. In addition, Government guidance also requires that Ramsar sites (which support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance [Ramsar Convention]) are also included within the HRA process.
- 3.3 The process of HRA is based on the precautionary principle and evidence should be presented to allow a determination of whether the effects of a land-use plan, when considered in combination with the effects of other plans and projects against the conservation objectives of a European Habitats Site; would adversely affect the integrity of that site. Where effects are considered uncertain, the potential for adverse effects should be assumed.
- 3.4 This Screening Report considers whether the Traveller and Travelling Showpeople DPD will have any significant effects on Habitats Sites which would therefore require a full Appropriate Assessment (AA) to be undertaken. It is being published alongside the Publication (Regulation 19) DPD consultation document however, it will continue to be updated as the DPD develops

¹ Updated by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

to take into account any comments arising from the consultation, particularly those of Natural England, and any changes to the policies and sites set out within the DPD.

4. Methodology

4.1 The application of HRA to Local Development Documents is an evolving field and has been informed by a number of key guidance and practice documents. Draft guidance for HRA ‘Planning for the Protection of Natura 2000 Sites: Appropriate Assessment’, was published by the Government (DCLG, 2006) and is based on the European Commission’s (2001) guidance for the Appropriate Assessment of Plans. The DCLG draft guidance recommends three main stages to the HRA process:

- **Stage 1:** Screening for Likely Significant Effects (LSEs)
- **Stage 2:** Appropriate Assessment, Ascertain Effects on Integrity
- **Stage 3:** Mitigations Measures and Alternatives Assessment.

4.2 If alternative solutions or avoidance/ mitigation measures to avoid adverse effects on site integrity cannot be delivered then current guidance recommends an additional stage to consider Imperative Reasons of Overriding Public Interest (IROPI) for why the plan should proceed. For the HRA of land use plans IROPI is only likely to be justified in a very limited set of circumstances and must be accompanied by agreed, deliverable compensation measures for the habitats and species affected. For this reason the IROPI stage is not detailed further in this report.

4.3 Natural England has produced additional, detailed guidance on the HRA of Local Development Documents (Tyldesley, 2009) that complements the DCLG guidance, and builds on assessment experience and relevant court rulings. The guidance sets out criteria to assist with the screening process; addresses the management of uncertainty in the assessment process; and importantly outlines that for the HRA of plans; “ ... what is expected is as rigorous an assessment as can reasonably be undertaken in accordance with the requirements of the Regulations ...”.

4.4 The key stages of the HRA process overall, and the specific tasks undertaken for each stage are set out in **Table 1**. This table is consistent with the methodologies set out within the guidance documents above.

Table 1: Habitats Regulations Assessment: Key Stages	
Stages	Habitats Regulations Assessment
Stage 1: Screening for Likely significant Effects	1. Identify Habitats Sites in and around the plan area.
	2. Examine the conservation objectives of each interest feature of the Habitat(s) Sites potentially affected.
	3. Analyse the policy/ plan and the changes to environmental conditions that may occur as a result of the plan. Consider the extent of the effects on Habitats Sites (magnitude, duration, location) based on best available information.

	4. Examine other plans and programmes that could contribute (cumulatively) to identified effects.
	5. Produce screening assessment based on evidence gathered and consult statutory nature conservation body on findings.
	6. If effects are judged likely or uncertainty exists – the precautionary principle applies proceed to Stage 2.
Stage 2: Appropriate Assessment	1. Agree scope and method of Appropriate Assessment with statutory nature conservation body.
	2. Collate all relevant information and evaluate potential effects on site(s) in light of conservation objectives.
Stage 3: Mitigation Measures and Alternatives Assessment	1. Consider how effect on integrity of site(s) could be avoided by changes to plan and the consideration of alternatives (e.g. an alternative policy/ spatial location). Develop mitigation measures (including timescale and mechanisms for delivery).
	2. Prepare HRA/ AA report and consult statutory body.
	3. Finalise HRA/AA report in line with statutory advice to accompany plan for wider consultation.

4.5 This report covers Stage 1 (evidence gathering and screening) of the above process. It has been informed by data produced by Natural England and the Joint Nature Conservation Committee. The screening process determines whether the subsequent stages 2 and 3 are required.

4.6 Department of Communities and Local Government guidance 'Planning for the Protection of European Sites: Appropriate Assessment' produced in 2006 states that AA should be made available to the community and may be consulted on as appropriate on the preferred options at regulation 26 stage (pre-submission public participation). The Screening Report is now being published alongside the Publication (Regulation 19) DPD for consultation and will be updated and re-published at the submission stage, if necessary, in order to meet this requirement. Any comments on this report should be made in writing by no later than midnight on **13th December 2022** and sent to:

- E-Mail: contact@swdevelopmentplan.org
- Post: South Worcestershire Development Plan, Civic Centre, Queen Elizabeth Drive, Pershore, Worcestershire, WR10 1PT

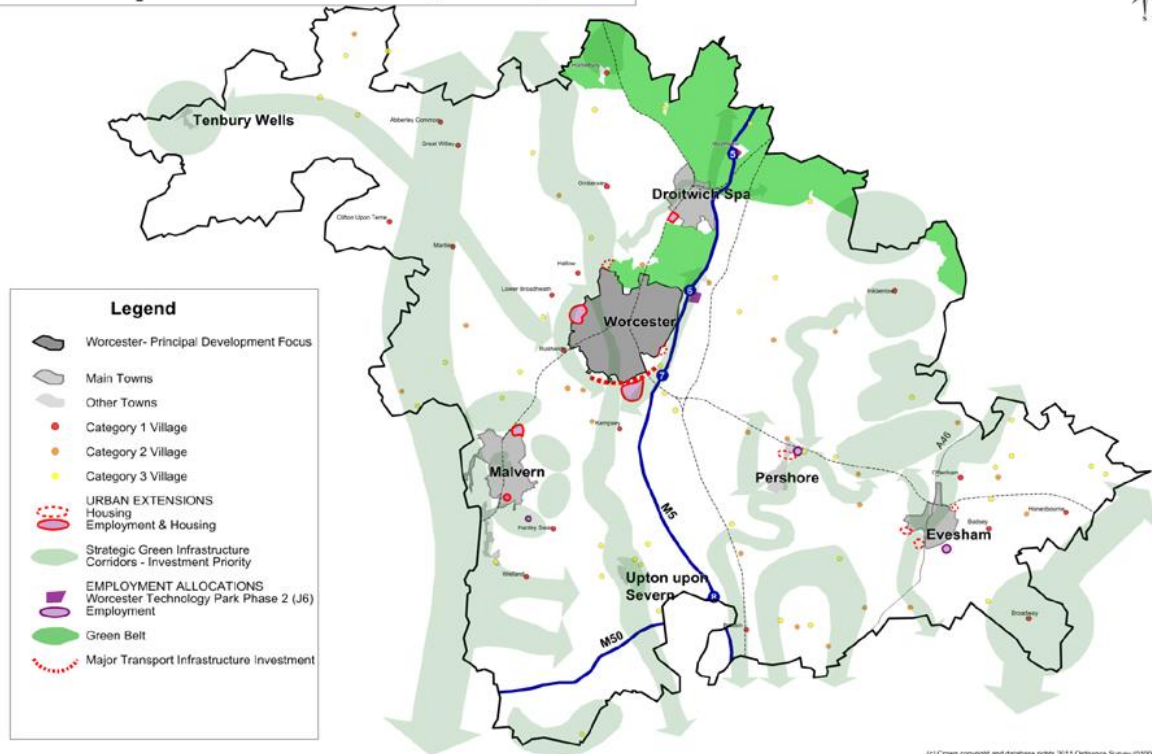
5. Traveller and Travelling Showpeople Site Allocations DPD – Key Proposals

- 5.1 The final DPD will allocate new sites or extensions or intensifications to existing Traveller and Travelling Showpeople sites, and will become part of the Development Plan for the South Worcestershire Councils (SWCs).
- 5.2 Since 1 Jan 2019 planning consent has been granted for 45 pitches and it is these plus the 4 suggested site allocations, for an additional 15 pitches, within the Traveller DPD which will meet the requirements of 50 pitches as set out in the Gypsy and Traveller Accommodation Assessment for the first 10 years. The proposed site allocations and the Habitats Sites within the plan area are mapped at Appendix 1 to this report. The DPD also sets out development management policies which are specific to Traveller and Travelling Showpeople sites.

6. Overview of the Plan Area

- 6.1 South Worcestershire covers approximately 1,300 square kilometres of the County and forms the southern limit of the West Midlands. The area is comprised of the largely rural districts of Malvern and Wychavon, with the City of Worcester forming the largest urban area. Three main towns, Droitwich Spa, Evesham and Malvern and the smaller towns of Pershore, Tenbury Wells and Upton-upon-Severn form the other main centres of population. In addition there are around 200 villages. The total population of the area is estimated at 315,800 (Census 2021).
- 6.2 South Worcestershire is characterised by a high-quality natural environment that includes the upland areas of the Cotswolds (including Bredon Hill) and the Malvern Hills Areas of Outstanding Natural Beauty (AONB) and the river valleys of the Avon, Severn and Teme. The area's biodiversity interest is reflected by a significant number of national designations (Sites of Special Scientific Interest, SSSIs) and two Special Areas of Conservation (SAC) sites. Local wildlife (including Biodiversity Action Plan habitats and species) is also an important element of the overall environmental richness of the area, which attracts a significant number of tourists and visitors accounting for approximately 11% of local expenditure.
- 6.3 South Worcestershire is easily accessible by road and rail, however, there are identified capacity issues in the current transport network and reliance on private car travel, particularly in rural areas, is a key sustainability issue for the area. Of the 127,000 employee jobs in the area, 65% are at Worcester and the main towns, therefore commuting both within and outwith the area is a requirement.
- 6.4 The map overleaf illustrates the main features of the Plan area including transport and infrastructure links.

SOUTH WORCESTERSHIRE Development Plan - Key Diagram



(c) Crown copyright and database rights 2011 Ordnance Survey (0300018890)

6.5 As detailed in Table 1, HRA typically involves a number of stages. This section of the report sets out our approach and findings for Stage 1, HRA Screening for the Traveller and Travelling Showpeople Policies and Site Allocations DPD. The aim of the screening stage is to assess in broad terms whether the policies and proposals set out in the plan are likely to have a significant effect on a Habitats Site(s), and whether in the light of available avoidance and mitigation measures, an AA is necessary.

7. Scope of the HRA

7.1 Plans can have spatial implications that extend beyond the intended plan boundaries. In particular, it is recognised that when considering the potential for effects on Habitats Sites, distance in itself is not a definitive guide to the likelihood or severity of an impact. Other factors such as inaccessibility/remoteness, the prevailing wind direction, river flow direction, and ground water flow direction will all have a bearing on the relative distance at which an impact can occur. This means that a plan directing development some distance away from a Natura 2000 Site could still have effects on the site when scoping the HRA, it is necessary to consider which Habitats Sites could potentially be affected by the Traveller and Travelling Showpeople DPD.

7.2 The Traveller and Travelling Showpeople Policies and Site Allocations DPD does not include significant development proposals. The principle of meeting the need for Travellers and Travelling Showpeople was previously set out within the SWDP. The SWDP itself underwent Appropriate Assessment which did not identify any significant effects on Habitats Sites,

however, it is intended that the Traveller DPD replaces the SWDP in matters relating to Travellers and Travelling Showpeople. It includes policies to clarify the need for Traveller sites and Travelling Showpeople plots, as informed by the Gypsy and Traveller Accommodation Assessment (GTAA, 2019), allocates sites and sets out more detailed policies on design to assist the Development Management process. It will sit alongside the South Worcestershire Development Plan Review which allocates new settlements three of which are also intended to provide for Traveller and Travelling Showpeople accommodation needs. This HRA Screening Report will consider the potential impact of the Traveller and Travelling Showpeople DPD on all of those sites identified within the HRA relating to the SWDP.

7.3 Two Habitats Sites fall within the boundary of the Plan area; Lyppard Grange Ponds SAC and Bredon Hill SAC. An overview of their characteristics is set out below. This is followed by a summary of the Joint Nature Conservation Committee (JNCC) information for each of the sites.

<p>Bredon Hill SAC is an area of pasture woodland and ancient parkland situated approximately 4.5km to the South West of Evesham. The site provides habitat for the Violet Click Beetle <i>Limoniscus violaceus</i>, which develops in the decaying wood either of very large, old hollow beech trees (Windsor Forest) or ash trees (Worcestershire/ Gloucestershire border sites). Currently the key site attributes which Natural England understands the species to require is related to the abundance and condition of the ancient trees on the designated site within which it develops.</p>
<p>Lyppard Grange SAC is located on the East outskirts of Worcester and is situated amongst a recent housing development on former pastoral farmland. The site is composed of two ponds in an area of grassland and scrub (public open space). The site provides habitat for Great Crested Newts <i>Triturus cristatus</i>, which are dependent on both the existing terrestrial habitat (to provide foraging areas and refuge) and on the pond, aquatic habitat (for breeding).</p>

Table 2: Information Relating to Habitats Sites Covered by the Screening Report			
Site	Reason for Designation and Conservation Objectives	Factors Affecting the Site's Integrity	Vulnerability
Bredon Hill SAC	<p><i>Limoniscus violaceus</i></p> <ul style="list-style-type: none"> for which this is one of only three known outstanding localities in the United Kingdom. which is known from 15 or fewer 10 x 10 km squares in the United Kingdom. 	<p>Habitat for <i>Limoniscus violaceus</i></p> <p>Lack of replacement trees for the current ancient trees.</p>	<p>Bredon Hill is an area of pasture woodland and ancient parkland providing habitat for <i>Limoniscus violaceus</i>.</p> <p>The main threats are the lack of a replacement generation of trees for the current ancient trees over much of the hill, as many of the younger trees have been removed to increase stock grazing areas; the overall number of ancient trees suitable for <i>Limoniscus violaceus</i> is relatively small. Management agreements are being used to preserve existing tree</p>

			stocks and to provide replacement planting.
Lyppard Grange SAC	Great Crested Newts have been identified at the site. The ponds are associated with good quality terrestrial habitats.	Great Crested Newt has been identified at the site. The ponds are associated with good quality terrestrial habitats	The site is composed of two ponds in an area of public open space surrounded by residential development. The site is vulnerable to the effects of recreational pressure and the introduction of fish which affect the suitability of the ponds as a breeding area for the Great Crested Newt.

7.4 Taking into account the potential for transboundary effects the screening has identified three European sites within a 15km buffer of the South Worcestershire Councils administrative boundary and two water dependent European sites downstream from the South Worcestershire Councils area. Summary site characterisations are provided below. A pre-screening exercise was carried out and on the basis of this analysis the five sites were scoped out of this screening. The reasoning for this is presented below each of the summary site characterisations below.

<p>Dixton Wood SAC is situated approximately 6.7km to the South East of Tewkesbury and is an area of broadleaved woodland (formerly partially grazed) with a dominance of ash including exceptionally large ancient pollards. The site is designated for its population of Violet Click Beetle <i>Limoniscus violaceus</i>, which is largely dependent on these pollards (for breeding). Principal risks to the site's integrity are lack of future replacement pollards (age-class skewed to older generation) and game management practices.</p>
<p>Downton Gorge SAC is an example of Tilio-Acerion forests in a narrow ravine with a distinctive microclimate and a variety of slopes and aspects. Both small leaved lime <i>Tilia cordata</i> and large-leaved lime <i>T. platyphyllos</i> occur, together with ash <i>Fraxinus excelsior</i> and elm <i>Ulmus</i> spp. The ground flora includes wood fescue <i>Festuca altissima</i> and violet helleborine <i>Epipactis purpurata</i>. The gorge cliffs are rich in ferns, reflecting the humidity of the site, with a wide range of species recorded. The site is potentially vulnerable to the effects of air- and water-borne pollution, particularly in respect of its significant lichenological interest. However these effects are not related to the management of the site.</p>
<p>The River Wye SAC, on the border of England and Wales, is a large river of plain to montane levels. It has a geologically mixed catchment, including shales and sandstones, and there is a clear transition between the upland reaches, with characteristic bryophyte-dominated vegetation, and the lower reaches, with extensive Ranunculus beds. There is an exceptional range of aquatic flora in the catchment including river jelly-lichen <i>Collema dichotum</i>. The river channel is largely unmodified and includes some excellent gorges, as well as significant areas of associated woodland. The site is also designated for its populations of Lamprey, White-clawed crayfish, Twait Shad, Atlantic Salmon, Bullhead and Otter.</p>
<p>Severn Estuary SPA/Ramsar/cSAC is the largest coastal plain estuary in the UK with extensive mudflats and sandflats, rocky shore platforms, shingle and islands. Saltmarsh fringes the coast, backed by grazing marsh with freshwater and occasional brackish ditches.</p>

The estuary's classic funnel shape, unique in the UK, is a factor causing the Severn to have the second highest tidal range in the world (after the Bay of Fundy in Canada) at more than 12 meters. This tidal regime results in plant and animal communities typical of the extreme physical conditions of strong flows, mobile sediments, changing salinity, high turbidity and heavy scouring. The resultant low diversity invertebrate communities, that frequently include populations of ragworms, lugworms and other invertebrates in high densities, form an important food source for passage and wintering birds. The site is important in the spring and autumn migration periods for waders moving along the west coast of Europe, as well as in winter for large numbers of waterbirds including swans, geese, ducks and waders. These bird populations are regarded as internationally important.

Walmore Common SPA/Ramsar is located in Gloucestershire, in the west of England, about 10 km south-west of Gloucester. The site is a wetland overlying peat providing a variety of habitats including improved neutral grassland, unimproved marshy grassland and open water ditches. The area is subject to regular winter flooding and this creates suitable conditions for regular wintering by an important number of Bewick's Swan *Cygnus columbianus bewickii*. The highest bird numbers are seen during the harshest winters, when Walmore Common provides an essential feeding and roosting area.

- 7.5 A Pre-Screening exercise was carried out for the HRA of the SWDP which identified that these sites should not be included within the scope of the HRA. The sites have also not been included within the scope of this HRA for the reasons set out below.

Dixton Wood SAC

- 7.6 Dixton Wood SAC is 2.4km from the South Worcestershire Councils boundary and according to the JNCC the principal risks to the site's integrity are lack of future replacement pollards and game management practices. According to the JNCC, these issues will be addressed through localised management agreements with the owner of the site. Based on Natural England advice^{2 3}, it is generally felt that air pollution only needs to be considered at a site if a road carrying a significant proportion of new traffic related to the plan runs within 200 metres of a European site. Beyond this distance air pollution impacts that may arise from traffic fall to background levels. The Traveller and travelling Showpeople Policies and Site Allocations DPD is not considered likely to increase traffic on any roads within 200m of the SAC and therefore the DPD will not have any significant alone or in combination effects on the Dixton Woods SAC.

Downton Gorge SAC

- 7.7 Downton Gorge SAC is 12km north east from the South Worcestershire Councils boundary and is vulnerable to the effects of air and water borne pollution. As the South Worcestershire Councils area is downstream to the site it is unlikely that the associated development will have any direct effects on water levels or quality. The Traveller and Travelling Showpeople sites proposed are all small scale and are in excess of 15km away from the SAC. On the same basis as the analysis of Dixton Wood SAC in regard to diffuse air pollution, the Traveller and Travelling Showpeople Site Allocations DPD will not have significant effects alone or in combination on Downton Gorge SAC.

² SIGNAL, K., ASHMORE, M. & POWER, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

³ RICARDO-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report no.199.

The River Wye SAC

- 7.8 The River Wye SAC is 9.2km from the South Worcestershire Councils boundary and is vulnerable to the effects of air and water borne pollution. Within the Wye Catchment, surface water is the dominant source of supply. The largest abstractor for public water is Welsh Water with 40% of the total daily licensed volume. Severn Trent Water (which supplies water to the South Worcestershire Councils area) also abstracts holding 3 licenses in the lower River Wye, which represents 10% of the total daily licensed volume. The Wye Catchment is mainly a source of water for Birmingham, South East Wales and Gloucester. Only a very small fraction of the South Worcestershire Councils area falls within the Wye Catchment making it highly unlikely that it will have a direct effect on water quality. Therefore the development proposed in the Traveller and Travelling Showpeople Policies and Site Allocations DPD will not have significant effects alone or in-combination on the River Wye SAC.

The Severn Estuary SPA/ Ramsar/ cSAC and Walmore Common SPA/Ramsar

- 7.9 The Severn Estuary SPA/ Ramsar/ cSAC and Walmore Common SPA/ Ramsar are both dependent on water and are situated downstream from South Worcestershire Councils area. Under the Habitats Regulations the Environment Agency (EA) have to assess the effects of existing abstraction licences and any new applications to make sure they are not impacting on internationally important nature conservation sites. If the assessment of a new application shows that it could have an impact on a SAC/SPA the EA will have to follow strict rules in setting a time limit for that license. Effectively this means that every tributary of the Severn Estuary and River Severn must be managed using flow restrictions to ensure an appropriate flow contribution to the River Severn. This ensures that water levels in the River Severn and Estuary do not fall below critical levels.
- 7.10 The Traveller and Traveling Showpeople Policies and Site Allocations DPD allocates sites to meet the need identified in the GTAA. The SWDP HRA Screening Report (November 2012) considered the additional water required to service the new development proposed within the SWDP and the impact of this on the Severn Estuary SPA/ Ramsar/ cSAC and Walmore Common SPA/Ramsar. It was concluded that taking into account the levels of development proposed, together with the measures in place nationally to improve water efficiency and reduce leakages, and the strict licensing of water abstraction, the SWDP would not have a significant effect, alone or in combination, on the sites.

8. Effects of the DPD

- 8.1 Based on the analysis in Section 7, Bredon Hill SAC and Lyppard Grange SAC are included within the scope of this HRA screening exercise because there are potential impact pathways between them and the Traveller and Traveling Showpeople Policies and Site Allocations DPD. The table below summarises the potential effects of the Traveller and Traveling Showpeople Policies and Site Allocations DPD on the two Habitats Sites screened in to the HRA.

Summary of the Effects of the DPD					
Site	Factors affecting the site's integrity	Possible effects arising from the Traveller and Travelling Showpeople DPD	Is there a risk of a significant effect?	Possible effects from other trends, plans etc.	Is there a risk of 'in combination' effects
Bredon Hill SAC	Habitat for <i>Limoniscus violaceus</i> violet click beetle	None	No	No	No
	Lack of replacement trees for the current ancient trees.	None	No	No	No
Lyppard Grange SAC	Great Crested Newt has been identified at the site.	None	No	No	No
	The ponds are associated with good quality terrestrial habitats	None	No	No	No

- 8.2 A table setting out the full assessment forms Appendix 2 to this report. This HRA Screening Report does not consider the strategic allocations included within Policy T1 (Worcester South and Worcester (refer policies SWDP45/1 and SWDP45/2 respectively) allocated within the SDWP 2016 and the strategic allocations at Worcestershire Parkway, Rushwick and Throckmorton Airfield proposed to be allocated within the Regulation 19 Publication version of the SDWP Review, September 2022). The Travellers sites to be delivered within these strategic sites are not allocated within the Traveller and Travelling Showpeople Policies and Site Allocations DPD.

- 8.3 The Worcester South and Worcester West strategic allocations have been subject to HRA as part of the preparation of the adopted SWDP. The HRA Report⁴ can be accessed here: <https://www.swdevelopmentplan.org/swdp-2016/swdp-core-documents>
- 8.4 The strategic allocations at Worcestershire Parkway, Rushwick and Throckmorton Airfield are currently being subject to HRA as a part of the preparation of the SWDP Review. The latest HRA Report⁵ can be accessed here: <https://www.swdevelopmentplan.org/>
- 8.5 Both HRA Reports of the adopted SWDP and the draft SWDPR conclude that the plans would have no adverse impact on site integrity at any Habitats site, either alone or in-combination.
- 8.6 This HRA screening concludes that no significant effects are likely as a result of the Traveller and Travelling Showpeople Policies and Site Allocations DPD. The locations of the sites and the proposed draft policies will not have a detrimental impact on the factors that affect the integrity of the Habitats Sites identified as being relevant to this Plan.

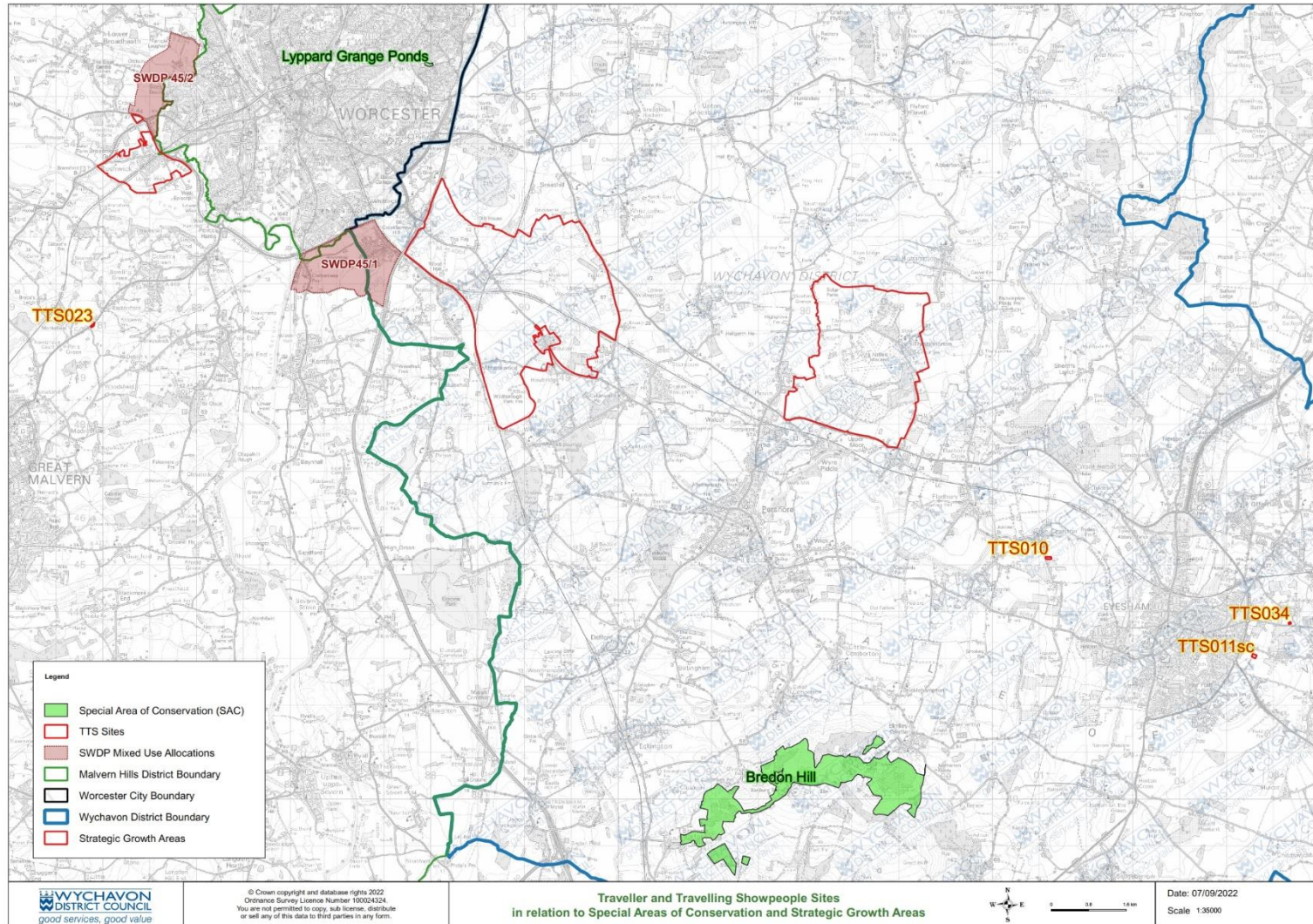
9. Conclusion

- 9.1 The HRA Screening Report does not identify any potential likely significant effects arising from the Traveller and Travelling Showpeople Policies and Site Allocations DPD. This will be reviewed as the DPD evolves and an updated version of this report will be prepared if modifications are put forward at the Submission stage.

⁴ Habitats Regulations Assessment (Appropriate Assessment) Report South Worcestershire Development Plan Pre-Submission Consultation, November 2012

⁵ Habitats Regulations Assessment of the South Worcestershire Development Plan Review 2021 – 2041 Publication Version Volume 1 of 2: Publication Version HRA Report, August 2022

Appendix 1: Figure Showing European Sites and Proposed Allocation Sites



Appendix 2: Assessment of Allocation Sites and Policies

SITE/POLICY	LIKELY IMPACT ON SAC
POLICIES	
Policy T1: Meeting the Needs of Travellers and Travelling Showpeople	The number of pitches to be provided over the plan period will not have a likely significant effect on the SACs identified. With reference to the factors affecting the integrity of the SACs, the locations of development of pitches could, in theory, affect the sites, and that is considered in the screening of Policy T2: Traveller Site Allocations.
Policy T3: Design of Traveller Sites and Travelling Showpeople Yards	The design of Traveller Sites and Travelling Showpeople Yards will not have a likely significant effect on the integrity of the SACs identified as no impact pathways exist with the SACs identified e.g. air quality which could be affected by Traveller Sites and Travelling Showpeople Yards design. See below for discussion of potential effects of allocation sites due to their locations.
Policy T2: Traveller Site Allocations	This policy only allocates the site allocations listed below. Therefore see below for the HRA screening of this policy.
ALLOCATION SITES	
The Paddocks, Newlands	<p>This allocation is an extension of 4 pitches to an existing Traveller site and is over 5km from the boundary of Bredon Hill SAC. The main threat to the integrity of the SAC is the lack of replacement trees. The allocation of this site will not have a detrimental impact on the implementation of the management plan for the SAC. No significant effect is likely.</p> <p>This allocation is over 8km from Lyppard Grange SAC. The main threat to the SAC is to the pond and terrestrial habitats on the site and Great Crested Newts. Given the distance between the site allocation and the SAC, it is considered that no likely significant effect will occur.</p>
The Hill, Canada Bank, Charlton	<p>This allocation is an extension of 2 pitches to an existing Traveller site and is over 5km from the boundary of Bredon Hill SAC. The main threat to the integrity of the SAC is the lack of replacement trees. The allocation of this site will not have a detrimental impact on the implementation of the management plan for the SAC. No significant effect is likely.</p> <p>This allocation is over 17km from Lyppard Grange SAC. The main threat to the SAC is to the pond and terrestrial habitats on the site and Great Crested Newts. Given the distance between the site allocation and the SAC, it is considered that no likely significant effect will occur.</p>
The Orchards, Knowle Hill, Evesham	This allocation is only included in the DPD as an allocation in accordance with the planning permission granted under 21/01725 – it is not allocated for extra pitches over and above those already granted planning consent. The allocation is over 5km from the boundary of Bredon Hill SAC. The main threat to the

	<p>integrity of the SAC is the lack of replacement trees. The allocation of this site will not have a detrimental impact on the implementation of the management plan for the SAC. No significant effect is likely.</p> <p>This allocation is over 22km from Lyppard Grange SAC. The main threat to the SAC is to the pond and terrestrial habitats on the site and Great Crested Newts. Given the distance between the site allocation and the SAC, it is considered that no likely significant effect will occur.</p>
Blossom Hill, Village Street, Aldington	<p>This allocation is only included in the DPD as an allocation in accordance with the planning permission granted under 21/00786 – it is not allocated for extra pitches over and above those already granted planning consent. The allocation is over 5km from the boundary of the nearest Habitats Site, Bredon Hill SAC. The main threat to the integrity of the SAC is the lack of replacement trees. The allocation of this site will not have a detrimental impact on the implementation of the management plan for the SAC. No significant effect is likely.</p> <p>This allocation is over 22km from Lyppard Grange SAC. The main threat to the SAC is to the pond and terrestrial habitats on the site and Great Crested Newts. Given the distance between the site allocation and the SAC, it is considered that no likely significant effect will occur.</p>