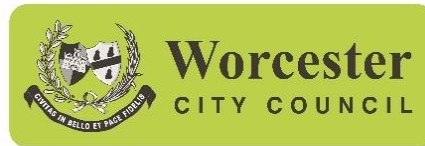




**South Worcestershire
Traveller and Travelling Showpeople
Policy and Site Allocations
Development Plan Document**

**Regulation 19 Stage Sustainability Appraisal
Report**






Date: 12th October 2022

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Glossary

Term	Explanation
Cumulative Effects	<p>Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. Includes synergistic effects where interactions produce a total effect greater than the sum of the individual effects.</p> <p>Cumulative effects are also taken to mean ‘in-combination effects’ under the Habitats Directive, where other plans or projects in combination with a plan might affect European sites.</p>
Development Plan	The statutory framework for planning decisions, comprising the Development Plan Documents prepared by local planning authorities (including the County Council and District Councils).
Direct/ Indirect	Distinguishes between effects that are a direct result of the policy (e.g. land loss) or are secondary, they occur away from the original effect or as a result of a complex pathway.
DPD (Development Plan Document)	A document containing local planning policies or proposals which form part of the Development Plan, which has been subject to independent examination.
Duration Short term: Medium term: Long-term:	<p>0 – 5 years (e.g. construction period)</p> <p>5 - 20 years (e.g. beyond construction up to the end of the plan period)</p> <p>20+ years (e.g. operation period and beyond the end of the plan period)</p>
European sites	<p>Special Areas of Conservation (SACs) - designated under the Habitats Directive (92/43/EEC); and Special Protection Areas (SPAs) - designated under the Wild Birds Directive (2009/147/EC).</p> <p>‘Ramsar sites’, designated under the Ramsar Convention 1971, are treated by UK Government policy as if they were European sites in terms of the protection and management afforded to them. They should be included in assessment, where relevant.</p>
Frequency	<p>Described in this report as either:</p> <ul style="list-style-type: none"> • Continual; or • Defined by number of occurrences (e.g. per annum); or • Intermittent.
Habitats Regulations Assessment (HRA)	An assessment in accordance with the Habitats Regulations (the Conservation (Natural Habitats, & c.) Regulations 2010 as amended) to ascertain the significance of potential impacts of a plan on relevant European sites. The assessment determines whether the plan would adversely affect the integrity of the sites in terms of its nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects.

Irreversible	The receptor would require significant intervention to return to (future) baseline condition, e.g. infrastructure improvements.
Local Plan	A plan prepared by District, Unitary and National Park authorities but which is being superseded by Development Plan Documents.
NPPF (National Planning Policy Framework)	Published in March 2012, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. The NPPF consolidates and replaces most previous planning policy guidance from Government. The NPPF is supported by the National Planning Practice Guidance (NPPG).
Magnitude	High 80%+ receptor or environmental capacity affected. Medium 40-80% of receptor or environmental capacity of affected Low 20-40% of receptor or capacity affected
Permanent	Lasting or intended to last or remaining unchanged indefinitely e.g. arising from infrastructure or continual effects from traffic
Probability	Low 20-40% Medium 40-80% High >80% e.g. highly likely that a receptor will be affected or effect will occur based on available evidence.
Reversible	The receptor can return to (future) baseline condition without significant intervention, e.g. management or operational measures.
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SCI (Statement of Community Involvement)	A document within the LDF setting out the District Council's proposals for involving the local community and other stakeholders in the preparation of LDDs and the determination of planning applications.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.
Spatial extent	International / Transboundary - Effects extending beyond the UK National - Effects within England or the UK but extending beyond region Regional - Effects within the East Midlands or extending beyond Local Local – Effects within the District Council or confined to the local area, typically <5km from source.
Temporary	Lasting for only a limited period of time; not permanent e.g. during construction.

1 Introduction

The South Worcestershire Councils (SWC) of Malvern Hills, Worcester City and Wychavon District Councils have been working on a joint basis since 2010 on the preparation of the South Worcestershire Development Plan (SWDP). The SWDP was adopted with effect from 25 February 2016. It provides the strategic, housing supply and development management framework for south Worcestershire for the period from 2006 up to 2030.

A requirement of Government Planning Policy for Traveller Sites (DCLG, 2015¹) and the 2021 National Planning Policy Framework (NPPF²; para 62) is that local authorities are required to identify and allocate sufficient sites to meet the needs of Traveller and Travelling Showpeople. Therefore, the South Worcestershire Councils have prepared a Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) that will complement the strategic and development management policies in the SWDP. The DPD allocates sites to meet the housing needs of Traveller and Travelling Showpeople in south Worcestershire. The commitment to prepare a DPD was set out in the Local Development Scheme (LDS) 2020-2023, adopted by the South Worcestershire Councils in October 2020. As part of the preparation of the Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) there is a requirement to assess the sustainability of the DPD and to prepare a report which documents the assessment known as a Sustainability Appraisal (SA).

1.1 Background

SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (July 2021) also requires SA of Local Plans. The SA must also incorporate the requirements of the Strategic Environment Assessment (SEA) Directive.

Within the context of local planning in England, it is accepted practice to integrate the requirements of SA and SEA into a single assessment process, as set out in the Planning Practice Guidance³ (updated 2020). The purpose of SA is to appraise the environmental, social, and economic effects of plans and programmes. The SA 'testing' of the site allocations and their reasonable alternatives will help to develop the most sustainable policies and proposals as an integral part of the plan's development.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

2 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

3 <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Strategic Environmental Assessment (SEA) in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

This SA report has been prepared on behalf of the South Worcestershire Councils (SWC) by ClearLead Consulting Ltd, to report on the integration of sustainable development considerations into the Traveller and Travelling Showpeople Policies and Site Allocations Development Plan Document (known as 'the DPD' in this report). It is being published and consulted on and it will inform the development of the DPD.

1.2 This document

This document forms the Regulation 19 Sustainability Appraisal Report for the SWDP Traveller and Travelling Showpeople DPD.

The remaining sections of this document are structured as follows:

- **Section 2 Methodology** describes the approach to the SA;
- **Section 3 The Scope and Content of the draft DPD** describes the scope, content, vision and objectives of the DPD;
- **Section 4 Review of Other Programmes and Plans** describes the context of the SA;
- **Section 5: Summary of Baseline Data** sets out the baseline data supporting the SA including key sustainability issues, data gaps and future evolution of the baseline;
- **Section 6 Alternatives** describes the alternatives identified and assessed, the findings of the assessment of alternatives and the reasons for choosing the proposed policies and site allocations. This section is supported by Appendix A;
- **Section 7 Results of the assessment of the draft DPD** presents the potential significant and cumulative effects of the draft DPD. This section is supported by Appendix B;
- **Section 8 Mitigation and Enhancement** presents the measures put forward to offset potential significant negative and uncertain effects of the policies and proposed site allocations and measures which could enhance sustainability performance;
- **Section 9 Monitoring** presents proposed monitoring arrangements; and
- **Section 10 Next Steps** sets out the next activities in the SA and DPD.

1.3 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2017 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e., Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

HRA Screening has been undertaken in an iterative manner as the DPD has been developed. The HRA Screening Report has most recently been updated in October 2022. HRA Screening considered the potential impact of the DPD on all of those protected European sites identified within the HRA relating to the SWDP. Two sites fall within the boundary of the Plan area:

- Lyppard Grange Ponds SAC
- Bredon Hill SAC

The HRA Screening Report did not identify any potential significant effects arising from the DPD and these findings have been considered in the SA assessments of the DPD.

1.4 How to comment on this document

This report is being consulted on with the public and statutory consultees⁴ in order to provide information in support of the consultation on the DPD and to confirm that it provides sufficient information to ensure that a robust and legally compliant SA has been carried out. Other interested parties are also being notified and the document will be also available on the SWDP's website.

The consultation period on the DPD is from 1st November to 13th December 2022. We welcome your views on this SA Report during this period.

A series of questions are set out below in order to guide responses.

⁴ Environment Agency, Historic England and Natural England.

Questions to guide responses:

1. Do you agree that all of the reasonable alternatives for policies and sites have been identified?
2. Do you agree that the potential significant effects identified in the assessment and the alternative options are correct?
3. Do you agree with the proposed mitigation?

How to comment:

Please provide responses by **13th December 2022** to:

South Worcestershire Development Plan Team

Civic Centre, Queen Elisabeth Drive, Pershore, Worcestershire WR10 1PT

Email: contact@swdevelopmentplan.org

2 Approach to the SA

2.1 SA process and requirements

The SA process is shown in Figure 1. Stage A, Scoping, was completed in 2016.

This SA Report encompasses Stages B and C of the SA process (evaluation of the proposed Site Allocations Document against the SA Framework and SA report preparation) and fulfils the requirements to:

- Evaluate the potential effects of the Site Allocations Document implementation
- Identify and propose mitigation of significant adverse effects
- Propose appropriate monitoring of significant effects
- Prepare the formal SA Report

This SA report has been prepared by ClearLead Consulting Limited, on behalf of the South Worcestershire Councils. Council officers have undertaken assessments of the DPD sites and their alternatives and have prepared the baseline data for inclusion within this report. ClearLead Consulting Ltd has reviewed and advised the officers on the content of the report and worked with the Council officers to ensure that it meets the requirements of the SEA Regulations.

Figure 1: The SA Process

Local Plan Stage 1: Pre- production - Evidence Gathering	SA Stages and Tasks
	<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p><i>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</i></p> <p><i>A2: Collecting baseline information</i></p> <p><i>A3: Identifying sustainability issues and problems</i></p> <p><i>A4: Developing the SA Assessment framework</i></p> <p><i>A5: Consulting on the scope of the SA</i></p>
Local Plan Stage 2: Production	SA Stages and Tasks
	<p>Stage B: Developing and refining options and assessing effects</p> <p><i>B1: Testing the plan objectives against the SA assessment framework</i></p> <p><i>B2: Developing the plan options and preparing an Initial or draft IIA Report (not a statutory report)</i></p> <p><i>B3: Predicting the effects of the plan and its alternatives</i></p>

	<p><i>B4: Evaluating the effects of the plan and its alternatives</i></p> <p><i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</i></p> <p><i>B6: Proposing measures to monitor significant effects of implementing local plans</i></p>
	<p>Stage C: Preparing the formal SA Report</p> <p><i>C1: Preparing the formal SA Report</i></p>
	<p>Stage D: Consulting on the preferred options of the Local Plan and SA Report</p> <p><i>D1: Public participation on the preferred options of the Local Plan and the SA Report</i></p> <p><i>D2(i): Appraising significant changes</i></p>
Local Plan Stage 3: Examination	SA Stages and Tasks
	D2 (ii): Appraising significant changes resulting from representations
Local Plan Stage 4: Adoption and monitoring	SA Stages and Tasks
	D3: Making decisions and providing information
	<p>Stage E: Monitoring the significant effects of implementing the Local Plan</p> <p><i>E1: Finalising aims and methods for monitoring</i></p> <p><i>E2: Responding to adverse effects</i></p>

2.2 Stage A: Scoping

The scoping report is the first stage of the SA process (Stage A) and documents the tasks required to be undertaken at this stage. Following consultation on the Scoping Report, further stages of the SA process were published in due course, to accompany the DPD Initial Consultation document. The Scoping Report was produced in October 2015 and consulted on with the statutory consultees (Natural England, Historic England and the Environment Agency). The report outlined the baseline characteristics for the district as well as identifying the current issues related to sustainability relevant to the influence and objectives for the plan. The baseline data has been reviewed and updated by SWC in December 2021.

The most important product of the scoping stage is the SA Framework (Table 2.1), which contains a set of sustainability objectives against which the DPD and its alternatives will be tested. The objectives reflect the sustainability issues identified in the scoping exercise. The SA Framework also sets out indicators for the purpose of monitoring the effects of DPD once it is adopted and links the SA objectives to SEA Themes which are those topics required to be addressed by the SEA Directive.

Table 2.1: SA framework

SA Objectives	Decision-Making Criteria	SEA Theme
SA1. To develop a healthy, active and diverse economy	Are a wide range of employment opportunities accessible from the site?	Population
SA2. To maintain and improve communities to meet the needs of the population and promote social inclusion	Can the site be well integrated with existing communities?	Population
	If existing facilities are not present, could the site help reduce social exclusion through the provision of new community facilities or transport links?	
SA3. To provide for adequate on-site services for water supply mains electricity, waste disposal and foul and surface water drainage	Is the site capable of being connected to an electricity supply, water supply and wastewater facilities?	Population, human health, material assets.
SA4. To promote quality design and sustainable construction for building and places	Is the number of plots proposed appropriate to the size of the site?	Material assets, human health, population.
	Could the site support Sustainable Drainage Systems?	

SA Objectives	Decision-Making Criteria	SEA Theme
SA5. To contribute towards improving the health and wellbeing of all	Is there/will there be access to health care facilities by public transport or walking?	Human health, population.
	Is there access to open space, biodiversity and recreational facilities by cycling, walking and public transport?	
SA6. To reduce the causes of climate change and adapt to its impacts	Does the site provide access to a permanent power supply?	Climatic factors.
SA7. To minimise waste and promote recycling, reuse and recovery	Is the site in a location where existing kerb side recycling services can be extended, or big enough to provide onsite recycling facilities?	N/A
SA8. To reduce the need to travel and promote sustainable travel options	Whether the site is accessible by walking, cycling and public transport to local services and facilities including shops, schools and health facilities (refer to site assessment background report).	Climatic factors, air, human health.
SA9. To improve, restore and recreate biodiversity and geodiversity	Could the site have any adverse impact on sites designated under international, European, national or local designations?	Biodiversity, flora, fauna, soils.
	Could the site provide new habitats or enhance the connectivity of existing sites?	
	Is the site high quality agricultural land, i.e. Grade 3/3a or above? (Long term food production potential).	Soils
	Is the site, or part of the site, previously developed land?	
	Is the site greenfield?	
SA10. To protect and enhance landscape and townscape character and quality	Could the site have any adverse impact on Registered Parks and Gardens, protected landscapes e.g. AONB?	Landscape, cultural heritage.
	Is the site in the Green Belt?	
SA11. To protect and enhance the historic environment, historic character and quality of landscapes and townscapes	Could the site have any adverse impact on designated and non-designated heritage assets and their settings, that include: <ul style="list-style-type: none"> - Conservation Areas - Listed buildings - Archaeological sites 	Cultural heritage

SA Objectives	Decision-Making Criteria	SEA Theme
	<ul style="list-style-type: none"> - Historic Parks and Gardens - Historic landscape - battlefields 	
SA12. To minimise pollution	<p>Could the proposed use of the site cause increased noise, light or air pollution conflicts for existing development?</p>	Air, water, soil
SA13. To manage water in a sustainable manner	<p>Is the site capable of providing adequate on-site services for water supply and foul and surface water drainage? Is the site in a floodplain?</p>	Water, climatic factors

2.3 Stage B: Alternative Options assessment

The alternative options considered consisted of:

- 7 policy approach options; and
- 17 reasonable site options.

All alternatives were assessed to the same level of detail against the SA Framework. The detailed potential sustainability effects of the alternative policy options and site options are presented within Appendix A and are summarised in Section 6 of this report.

2.4 Stage C: Policies and Sites Assessment and Producing the SA Report

The Traveller and Travelling Showpeople Site Allocations DPD will allocate sufficient sites within South Worcestershire to meet the requirements identified through the 2019 Gypsy and Travellers Accommodation Assessment (GTAA).

The main objective of appraising site options within the SA is to assess the likely significant effects of each option; with the overall aim of showing that the preferred site options(s) are the most sustainable, given all reasonable alternatives. The assessment of the sites and the DPD policies has been undertaken using the SA Framework. In addition to the Initial SA Report prepared for the 2016 Preferred Options, further interim reports have been prepared for the subsequent Regulation 18 consultation stages in February 2018, February 2021 and May 2021. Each objective within the SA Framework has been assessed according to its own standards and thresholds, drawing on quantitative and qualitative data and/or professional judgment. To be compliant with the SEA Regulations, it was necessary to consider short, medium, long term, cumulative and interactions etc. permanent or temporary effects.

The following significance key (or scoring system) has been used when assessing sites and policies including all alternative options. Symbols, alongside explanatory text, have been used to record the performance of each site option against each sustainability objective.

Table 2.2: Potential Significance Scores

Score	Significant Score description
++	Significantly Positive. Development actively encouraged as it would resolve an existing sustainability problem
+	Positive. No sustainability constraints and development acceptable
0	Neutral
?	Unknown/uncertain effect
-	Negative. Potential sustainability issues; mitigation and/or negotiation possible
--	Significantly Negative. Problematical and improbable because of known sustainability issues; mitigation or negotiation difficult and/or expensive

The scoring system (using a range between ++ and --) is consistent and in conformity with other SAs of plans undertaken for the South Worcestershire Councils, in particular for the SWDP and is suggested as an appropriate method to employ in the SEA guidance⁵. The symbols chosen to depict the predicted effect each site option will have on each sustainability objective, and to what extent, are accompanied with explanatory text. The assessment of each site records the nature of potential effects such as duration, magnitude and scale, probability, permanent / temporary, direct, indirect and cumulative effects (see Appendices A and B).

2.5 Assumptions and Limitations

The SEA Regulations require the SA Report to include a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

During the course of the SA of the policies and sites, the following assumption has been made:

- It has been assumed that SWDP policies will be implemented to mitigate potential effects of the allocation sites, such as policy SWDP31: Pollution and Land Instability.

⁵ ODPM (2015) A Practical Guide to the Strategic Environmental Assessment Directive https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

The following limitation was also identified:

- The strategic nature of the assessment of potential locations for Traveller site delivery (i.e. the Worcester South and Worcester West urban extensions where no actual site has been identified yet) means that the information the assessments of these locations is based on is more limited than a site by site assessment would be.
- The DPD has been developed over a series of statutory Regulation 18 consultation periods since the adoption of the SWDP in 2016 in 2016, 2018 and 2021. This has required an update to the evidence base and GTAA surveys and additional ‘call for sites’, considered against evolving development strategies, that have had to be incorporated within further updates of the SA report. Changing Government policy with respect to traveller’s accommodation has also had to be reflected in the emerging DPD over the same timeframe. For further details on the previous consultations, please see: <https://www.swdevelopmentplan.org/publications/development-plan-documents/traveller-and-travelling-showpeople-site-allocations-dpd>

2.6 How the requirements of the SEA regulations have been met

Table 2.3 outlines where elements of the SEA regulations are addressed within the report.

Table 2.3: Fulfilling the Requirements of the SEA Regulations

What the regulations say ⁶	How this is addressed
An outline of the contents, main objectives of the plan or programme.	Set out in Section 3 of this document.
An outline of the relationship with other relevant plans and programs	Set out in Section 4 of this document.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Set out in Section 5 of this document.
The environmental characteristics of areas likely to be significantly affected.	Section 3.3 of this document outlines the characteristics of the plan area in general and Section 5 outlines those areas likely to be significantly affected. These characteristics and potential interactions have been informed

⁶ Please see Schedule 2 of the SEA Regulations: *Information for Environmental Reports*.

What the regulations say ⁶	How this is addressed
	by information contained within the SA baseline data (Section 5).
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 5 of this document outlines key sustainability issues related to each SA topic. This includes sites designated pursuant to Directives 79/409/EEC and 92/43/EEC. Further information is also available in the separate Habitat Regulations Assessment (HRA) Report.
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Section 4 outlines relevant environmental protection objectives. The way that those environmental objectives have been taken into account has been through integrating them into the SA Framework.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. The identification of the above effects should consider secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 7 sets out the potential significant effects of the DPD and Section 6 discusses the significant effects of reasonable alternatives. Details of the nature of effects are provided within Appendix A and Appendix B. This includes indirect (secondary), cumulative (cumulative and synergistic), duration (short/medium/long term), permanent or temporary and negative or positive effects. Definitions are provided within the glossary.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 8 sets out mitigation measures for significant negative effects and uncertain effects.
An outline of the reasons for selecting the alternatives dealt with	Section 6 outlines the reasons for selecting the alternatives dealt with.
A description of how the assessment was undertaken including any difficulties (such as	Section 2 outlines the methodology for all stages of the SA and Section 2.5 specifically

What the regulations say ⁶	How this is addressed
technical deficiencies or lack of know-how) encountered in compiling the required information.	describes any technical difficulties that were encountered. Section 5 outlines data gaps.
A description of measures envisaged concerning monitoring.	Monitoring arrangements are set out in Section 9 and indicators will be detailed within the Adoption Statement.
A non-technical summary of the information provided under the above headings.	See separate non-technical summary.
The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment.	The whole SA Report addresses this.
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4).</p>	The Scoping Report was consulted on with key stakeholders ⁷ , adjoining authorities and the public for a 6 week period over October and November 2015. In particular the consultation included the statutory consultees, representative organisations from the travellers and travelling showpeople community, county council, parish and town councils
<p>Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.</p>	<p>A version of the SA Report was consulted on alongside the Regulation 18 DPD between 17th May and 5th July 2021.</p> <p>This version of the SA Report will be consulted on alongside the Regulation 19 DPD which is being consulted on between 1st November and 13th December 2022.</p>

⁷ Statutory consultees are Historic England, Environment Agency and Natural England.

What the regulations say ⁶	How this is addressed
<p>EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.</p>	<p>Section 7 presents the potential significant effects of the draft Site Allocations Document. The assessment has not identified any potential effects on other EU member states.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p> <p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted.</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.</p> <p>The measures decided concerning monitoring.</p>	<p>This will be set out in the SA Adoption Statement.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation.</p>	<p>Monitoring arrangements are set out in Section 9 and indicators will be detailed within the Adoption Statement.</p>

3 The Content of the South Worcestershire TTSP Allocations Document

For the purposes of planning, in the Government's Planning Policy for Traveller Sites (DCLG, 2015) Travellers are defined as:

"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds of their own or their families or dependants educational or health needs or old age have ceased to travel permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such".

Further:

"in determining whether persons are gypsies and travellers for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- *Whether they previously led a nomadic habit of life;*
- *The reasons for ceasing their nomadic habit of life;*
- *Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances".*

From the same source, Travelling Showpeople are defined as;

"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their families or dependents more localised pattern of trading, educational or health needs or old age have ceased to travel permanently, but excludes Gypsies and Travellers as defined above".

Planning Policy for Traveller Sites (DCLG, 2015) states that LPAs should set pitch targets for Travellers and plot targets for Travelling Showpeople that address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring Local Planning Authorities (LPAs). National planning policy also states that LPAs should set out criteria to provide a basis for the allocation of sites and identify sufficient deliverable pitches to provide a five-year supply when measured against locally set targets.

The South Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA), published in 2019, identifies the need for additional Traveller pitches and Travelling Showpeople plots in the period between 2019 and 2041.

The GTAA identifies an overall shortfall of 30 permanent Traveller pitches across South Worcestershire for the first 5 years in the period to 31/12/2023: a need for a minimum of 15 pitches in Malvern Hills, 1 pitch in Worcester and 14 pitches in Wychavon.

For Travelling Showpeople, the GTAA identifies a need for 7 plots across South Worcestershire in the period to 01/01/2024, all in Malvern Hills.



The GTAA also identifies the likely longer-term requirement for pitches and plots, covering the period 2024 to 2041.

The GTAA suggests a need for up to 20 Traveller pitches between 2024 and 2028, 22 pitches during 2029 to 2033 and 32 pitches during 2034 to 2041, with most of the need arising in Wychavon.

For Travelling Showpeople, the GTAA indicates a need for an additional 3 plots in Malvern Hills between 2024 and 2041.

The availability and delivery of Traveller pitches will be kept under review. Each SWC will maintain a rolling five-year supply of deliverable pitches/plots sufficient to provide five years' worth of pitches/plots against the targets set out within the draft DPD.

3.1 The Vision and Main Objectives of the Plan

Vision

The Vision stated within the Traveller and Travelling Showpeople Site Allocations Development Plan Document is that by 2030, south Worcestershire will be an area where:

“Travellers and Travelling Showpeople have the same opportunities and responsibilities as the settled community to secure a decent home which allows them to pursue and preserve their traditional way of life and there is sufficient land and pitches available to meet the identified need for accommodation.

Sites are well located, sustainable and of high quality where residents enjoy living and where they and the site are well integrated with the wider local community.

Unauthorised developments and encampments are reduced and there are harmonious relationships between the Traveller, Travelling Showpeople and settled communities.

Both the travelling and the settled communities have security and certainty about their future and that of their local environment.”

Objectives

The overarching objective stated within the DPD to deliver this Vision is:

“To provide authorised pitches for Travellers and Travelling Showpeople in south Worcestershire in line with evidence of established need in the most appropriate locations, to reduce the number of unauthorised developments and encampments and enable Travellers and Travelling Showpeople to access the services and facilities to meet their needs, whilst respecting the interests of the settled community.”

This will involve further sub-objectives to:

1. Identify sites that are available, suitable and deliverable;

2. Allocate sufficient land and pitches to meet identified needs within south Worcestershire, in the most appropriate locations;
3. Allocate sites and pitches in the most sustainable location to enable reasonable access to local services and facilities including health, education and employments;
4. Ensure sites are of high-quality design, safe and pleasant places to live; and
5. Provide clear guidance for making decisions on planning applications regarding Traveller and Travelling Showpeople sites and
6. Grant planning permission in accordance with the allocations and policies in this Plan to meet identified needs within south Worcestershire in the most appropriate locations

3.2 Overview of the Plan Area

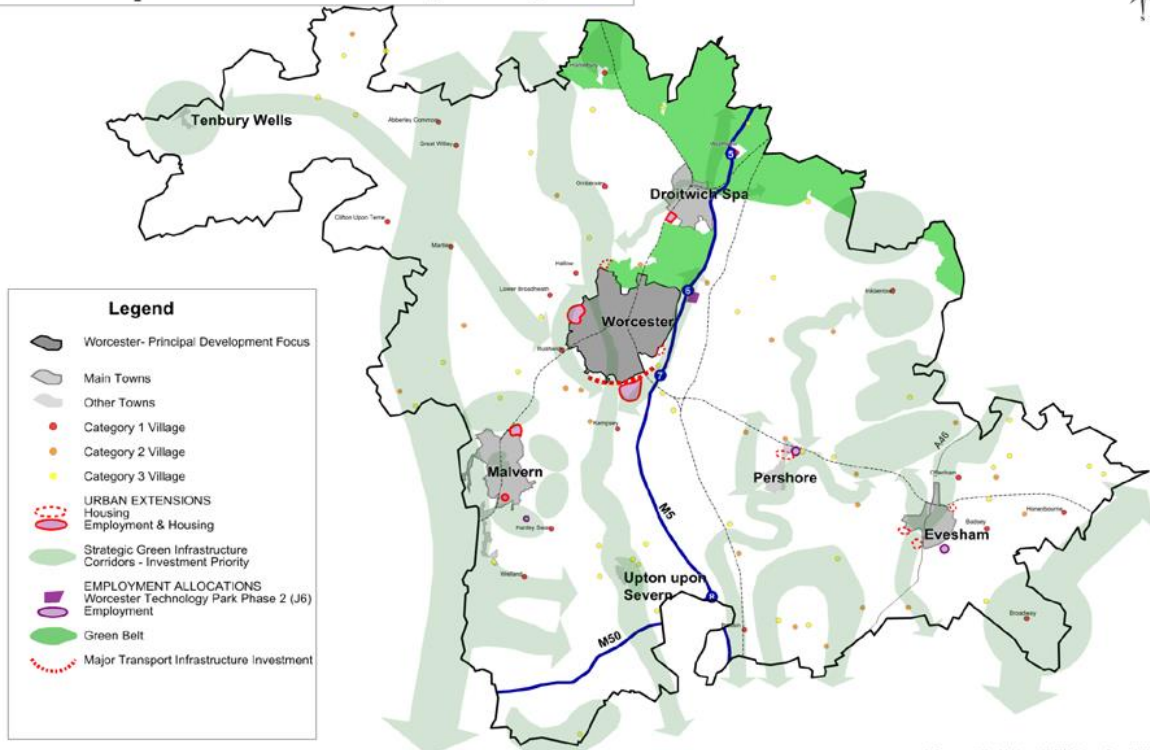
South Worcestershire covers approximately 1,300 square kilometres of the County and forms the southern limit of the West Midlands. The area is comprised of the largely rural districts of Malvern and Wychavon, with the City of Worcester forming the largest urban area. Three main towns, Droitwich Spa, 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 South Worcestershire is estimated at 315,800 (Census 2021).

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) are 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.

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 out of the area is a requirement.

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 (2100018893)

4 Review of Other Programmes and Plans

4.1 Summary of Key Messages

A requirement of the SA process is the identification of other plans and policies that are relevant to the document that is under preparation. The key documents that are relevant to the Gypsies, Travellers and Travelling Showpeople Site Allocations DPD are identified below (Table 4.1).

The identification of relevant plans and programmes is not exhaustive and seeks only to identify the key documents that are of greatest relevance to the preparation of the Travellers and Travelling Showpeople Site Allocations DPD. Consequently, the list is a snapshot of documents, and the precise list of documents will change over the time. It should also be noted that the list of relevant plans and policies excludes more evidence-based documents. These are referred to in the next section – Baseline Characteristics.

Table 4.1: Relevant Plans, Policies and Programmes⁸

Document
International and National
<ul style="list-style-type: none"> • European Directive 2001/42/EC – The Environmental Assessment of Plans and Programmes 2004 • EU Seventh Environmental Action Programme: Living Well, Within the Limits of our Planet (2013) • Planning Policy for Travellers Sites (2015), DCLG • National Planning Policy Framework (2021) • Planning Practice Guidance (March 2014 onwards) • Reducing Inequalities for Gypsies and Travellers progress report (April 2012) • Community Infrastructure Levy guidance (2014 onwards) • Natural Environment and Rural Communities Act 2006 • Planning and Compulsory Purchase Act 2004 • The Conservation of Habitats and Species Regulations 2017 • Human Rights Act 1998 • Gypsy, Roma and traveller pupils: supporting access to education (September 2014) • Countryside and Rights of Way Act 2000 • A Green Future: Our 25 Year Plan to Improve the Environment, 2018

Sub-National
<ul style="list-style-type: none"> • World Class Worcestershire: Our Strategic Economic Plan - Worcestershire LEP (2014) • Severn Trent Water – Water Resources Management Plan (2019) • Water for Life and Livelihoods – River Basin Management Plan Severn River Basin District (2015)
County and Local Plans and Programmes
<ul style="list-style-type: none"> • Worcestershire Local Transport Plan 42018-2030 – WCC 2017 • . • Worcestershire Biodiversity Action Plan 2018-2027 2018 • Worcestershire Landscape Character Assessment 2011. • Worcestershire Green Infrastructure Strategy 2013-2018 – Worcestershire GI Partnership • Air Quality action Plan for Worcestershire – Worcestershire Regulatory Services (2013) • The South Worcestershire Development Plan. Policies SWDP 17; 43; 45 • South Worcestershire Gypsy and Traveller Accommodation Assessment 2019 (WGTA) – evidence base • South Worcestershire Water Cycle Study 2019 – SWDP evidence base • South Worcestershire Strategic Flood Risk Assessment 2019 – SWDP evidence base • Statement of Community Involvement 2018

The key messages drawn from a review of Relevant Plans, Policies and Programmes are presented within Table 4.1.

Table 4.2: Key Messages from the Review of Relevant Plans, Policies and Programmes.

SA Topic	Key Messages from Review
Air, Noise & Light Pollution	<ul style="list-style-type: none"> • Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum and meet agreed air quality targets and objectives; • Contribute to climate change by developing and promoting low-carbon travel choices; • Promotion of walking and cycling as healthy and more preferable options to car for local journeys; • Mitigate and minimise adverse impacts on health and quality of life; • Minimise pollution and other adverse effects on the local and natural environment; • Planning policies should limit the impact of light pollution from artificial light on local amenity and nature conservation; and • Support the aims and objectives of the Air Quality Management Plan for Worcestershire.
Biodiversity & Green Infrastructure	<ul style="list-style-type: none"> • Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks; • Provide accessible natural greenspace; • Minimise impacts on biodiversity and provide net gains in biodiversity in line with NPPF and the emerging Environment Bill; • Restore, recreate and reconnect wildlife habitats, landscapes and communities; • Support development design and restoration that incorporates and enhances our geodiversity; • To maintain and enhance our geodiversity through the management of sites, areas and wider landscapes; • Maximise the potential of Green Infrastructure and develop it for healthy communities and ecosystems; • Aim to prevent harm to geological conservation interests; • To maintain and enhance geodiversity through the management of sites, areas and wider landscapes; • To increase recognition of our geodiversity in international, national, regional and local environmental and planning development policies and legislation; • Support the aims of the Biodiversity Actions Plans; and • Support the aims and objectives of the Worcestershire Green Infrastructure Strategy.
Climate Change	<ul style="list-style-type: none"> • Promote low carbon economies and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050; • Increase resilience to climate change impact through the location, mix and design of development; • Plan for new development in locations and through orientation and design which reduce greenhouse gas emissions; • Adapt to climate change e.g., considering future climate change risks when allocating development sites;

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Manage flood risks in an appropriate way taking account of the needs of the communities and the environment; • Avoid development in areas of flood risk; • Improve flood awareness and emergency planning; • Reducing the need to travel and providing sustainable transport to help mitigate climate change by reducing emissions; • Support energy efficiency and other sustainability improvements to existing buildings, particularly housing; • Recognise the embodied energy in existing buildings, avoid demolition and promote re-use of buildings; • Encourage the provision of renewable energy. Change to ‘provide opportunities for renewable and low carbon energy technologies’; • Increase energy efficiency and move towards a low carbon economy; and • Support the aims and objectives of each SWC’s climate change action plans.
Community Safety & Neighbourhood Quality	<ul style="list-style-type: none"> • Planning policies should aim to achieve healthy, inclusive and safe places; • Local neighbourhoods are and should feel like, safe and interesting places to play; and • Reduce anti-social behaviour. • Support the design policies in the SWDP that seek to design out crime and supporting guidance prepared by each city, district council and county council.
Economy & Employment	<ul style="list-style-type: none"> • Support the sustainable clean growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; • Create jobs and prosperity; • Support economic growth and productivity, having regard to local industrial strategies and other local policies for economic development and regeneration; and <p>Support the Worcestershire LEP and each city, district, and county councils’ economic development strategy to grow business and enterprise, create jobs and support the plan areas town centres and retail offer.</p>
Health & Wellbeing	<ul style="list-style-type: none"> • The Equality Act 2010 legally protects people from discrimination in the workplace and in the wider society; • Planning policies and decisions should aim to achieve healthy, inclusive and safe places; • Ensure a healthy standard of living for all; • Ensure equality and a prosperity for all; and

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Help to achieve the aim and objectives of the respective SWC strategies and promises to deliver on health improvements and wellbeing.
Housing	<ul style="list-style-type: none"> • Meet future housing need; • Ensure that housing growth requirements are accommodated in the most sustainable way; • Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local needs; • Make appropriate provision for gypsies, travellers and travelling show people; • Prevent homelessness; • Fulfil the requirement under the planning legislation and NPPF to provide a sufficient supply of sites to meet the need set out in the GTAA.
Landscape Character & Natural Resources	<ul style="list-style-type: none"> • Protect and enhance valued landscapes, biological and geological conservation interests and soils; • Recognise the wider benefits from natural capital and ecosystem services; • Seek to promote or reinforce local distinctiveness; • Recover nature and enhance the beauty of landscapes; and • There are major economic benefits to be gained from natural capital and their value should be considered and incorporated into decision-making in relation to land use.
Leisure & Recreation	<ul style="list-style-type: none"> • Local neighbourhoods are, and feel like, safe, interesting places to play; and • Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
Population & Equality	<ul style="list-style-type: none"> • The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society; and • Tackling rural social exclusion wherever it occurs and providing fair access to services and opportunities for all rural people. • Provide sites in locations via the development strategy that are accessible to a range of services and facilities.
Townscape Quality, Historic & Cultural Heritage	<ul style="list-style-type: none"> • Sustain and enhance the significance of heritage assets including international, national and local designated and non-designated heritage assets including locally significant historic buildings and heritage assets; • Sustain and enhance the historic environment, heritage assets and their settings; • Sustain and enhance access to cultural heritage assets; and • Ensure development in or adjacent to Conservation Areas or Listed buildings (and their settings) respects their character and context and enhances the quality of the built environment;

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> • Ensure that any alterations or repairs to traditional buildings preserve and where possible, improve the character and appearance of the building; • Promote the use of sustainable materials; • Protect the historic environment for the benefit of our own and future generations; • Maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it; and • Support the aim and objectives in the SWDP that seek to safeguard and enhance historic assets.
Transport & Accessibility	<ul style="list-style-type: none"> • Contribute to tackling climate change by developing and promoting low carbon travel choices; • Support the move to low emission vehicles; • Encourage sustainable transport and reduce the need to travel; • Make the fullest possible use of public transport, walking and cycling; make cycling and walking a natural choice for shorter journeys; • Local planning authorities should support the expansion of electronic communications networks; and • Support and enable more people to cycle and engage in active travel.
Water Resources & Flood Risk	<ul style="list-style-type: none"> • Inappropriate development in areas at high risk of flooding should be avoided; • Improve and promote water efficiency; • Ensure that water quality is improved or maintained where possible; • Prevent pollution of groundwater; and • Planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.

5 Summary of Baseline Data

In order to be able to identify the impact the Travellers and Travelling Showpeople Site Allocations DPD will have on sustainable development, it is important to have an understanding of the current circumstances or baseline which exists within the district and the trends that may continue without the preparation of the DPD.

This chapter sets out the baseline data that has been collected for both the plan area as a whole and is also of greatest relevance to Travellers and Travelling Showpeople. Wider information on relevant topics for south Worcestershire is set out in the suite of SWDP Sustainability Appraisals reports (see para. 3.1) [[SWDP Core Documents - South Worcestershire Development Plan \(swdevelopmentplan.org\)](http://swdevelopmentplan.org)].

5.1 Population

From the Office of National Statistics (ONS) 2019 mid-term estimates the total overall population of Worcestershire is 592,158, of which 17.7% are aged under 16 years, 63.1% are aged 16-64 and 19.2% are aged over 65 years compared to 16.6% in West Midlands, and 16.4% in England. Average household income in Worcestershire in 2021 was £32,000. This compares to an average household income for West Midlands of £34,000, and £36,357 in England.

Figures from the 2011 Census show that 92.4% of people in Worcestershire are White British. This compares to 79.2% in West Midlands and 79.8% in the whole of England. 95.7% of people in Worcestershire are from all White ethnic groups. This compares to 82.7% in West Midlands, and 85.4% in England.

In general Worcestershire has an older age profile than is seen across the whole of England. The 30-44 age group in England accounts for 20.6% of the total population, compared to 19.2% of the total population in West Midlands, and 18.2% in Worcestershire. In contrast, the 65+ age group accounts for 16.4% of the total population in England, compared to 16.6% of the population in West Midlands, and 19.2% in Worcestershire.

South Worcestershire is comprised of the largely rural districts of Malvern and Wychavon, with the City of Worcester forming the largest urban area. The total population of South Worcestershire is estimated at 315,800 (Census 2021). c

It is recognised that up to date and historical data relating to the Traveller community is difficult to source (Anglia Ruskin University, 2014). The South Worcestershire GTAA explains that for the first time, the national census, undertaken in 2011, included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. The 2011 Census suggests there were 706 Gypsies and Travellers residing in South Worcestershire representing around 0.24% of the usual resident population. This is higher compared to the West Midlands average of 0.08% (reflecting



the mainly rural characteristic of the study area). The proportion of Gypsies and Travellers recorded in the constituent South Worcestershire local authorities varied widely with 0.11% of the population of Worcester City recorded as Gypsies or Travellers, 0.18% of Malvern Hills, and 0.40% of Wychavon.

It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2011 Census data, (see Table 3.2 in the South Worcestershire GTAA) shows the tenure of 273 Gypsy and Traveller households. The most common tenure is social rented housing occupied by almost three fifths (58%) of households, followed by just over a quarter (28%) who own the housing they occupy, and around a seventh (14%) who rent privately. This includes households residing both on sites and in bricks and mortar accommodation.

The total number of caravans in South Worcestershire located on authorised pitches recorded by the MHCLG Traveller Count over the period January 2014 to January 2019. The MHCLG recorded a total of 393 caravans located on authorised pitches in January 2014 compared to 431 caravans in January 2019. The dotted trend line shows that over the 5 years from 2014 there was been a slight increase in the number of authorised caravans in South Worcestershire.

On average, around four fifths of all authorised caravans recorded by the MHCLG count in South Worcestershire are located in Wychavon. Almost all the caravans recorded by the MHCLG have permanent planning permission with only a few with temporary planning permission e.g. in January 2019 there were 8 caravans located in Malvern Hills with temporary planning permission.

However a study by The Irish Traveller Movement in Britain 'Gypsy and Traveller population in England and the 2011 Census' (2013) looked at the differences between the 2011 Census figures and an analysis of the latest GTAA reports. For the Census the total 2011 population for England based on the GTAA figures was 119,193, equating to over twice the 2011 census figure of 54,895 people and the 2011 DCLG caravan count figure of 49,634.

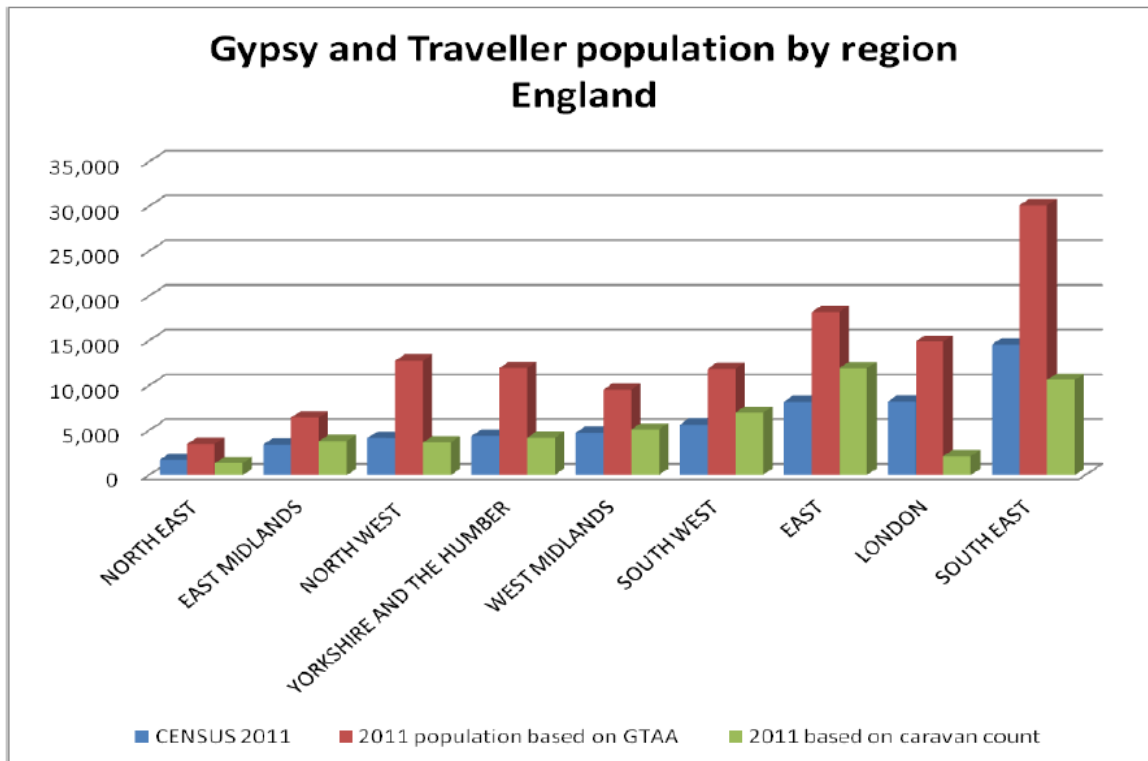


Figure 2: Gypsy and Traveller population by region

Source: The Irish Traveller Movement in Britain (2013)

Therefore it must be recognised that considering the trends against the national picture revealed in the 2011 Census needs to be treated with caution, but it is a safe assumption that the picture will be reflected (if not exacerbated given the divergence above) within south Worcestershire. Consequently, although it is recognised that some families may not identify themselves as Gypsies or Travellers in Censuses, in the 2011 Census, a total of 273 households in south Worcestershire were identified as having a ‘White: Gypsy or Irish Traveller’ (WGoIT) ethnicity. The Census figure includes households living in bricks and mortar accommodation as can be noted in Table 5.1 which identifies these households as recorded in the Census by their identified accommodation type.

Table 5.1: Households identifying as WGoIT by Accommodation Type

Households	Total: Accommodation type	House or bungalow	A flat, maisonette or apartment	A caravan or other mobile or temporary structure
Bromsgrove	23	11	5	7
Malvern Hills	48	28	14	6
Redditch	3	1	1	1

Worcester	42	21	9	12
Wychavon	183	96	19	68
Wyre Forest	127	88	16	23
South Worcestershire Total	273	145	42	86
Worcestershire TOTAL	426	245	64	117

Source: WGTA, 2014

The GTAA (2019) survey recorded 895 people residing in 230 households. Interestingly, this compares with figures derived from the 2011 Census which suggests that there were 706 Gypsies and Travellers living in the study area⁹. 10 participants did not describe themselves as Gypsies or Travellers i.e. they derived from the settled community. However, as they were either married to a Gypsy or Traveller or they have been classed by the local authority as New Travellers (according to the respondents) their household accommodation needs are included in the GTAA assessment). Whilst the Census figures are likely to reflect a larger proportion of Gypsies and Travellers living in bricks and mortar accommodation, they may not record all those residing on sites. The average size of families residing on the surveyed sites is 3.6 people compared to the 2011 UK average of 2.4 people per household (Gypsy and Traveller households tend to be larger than the settled community).

The majority of households were related to one another on their respective site. Most households had lived on their respective site since it was first developed and in some cases were born on the site. There are three generations of the same family residing on some sites.

Household size on each pitch varied between 1 person and 8 persons. In relation to age, 520 (58%) household members are adults and 375 (42%) of household members are aged 18 years or under.

The information collected via the interviews with Travellers for the 2019 GTAA revealed that there were (Spring 2019) 217 occupied permanent pitches within the study area consisting of 131 authorised private pitches, 86 local authority managed pitches (plus 4 unoccupied). There were also 30 transit pitches (24 with temporary planning permission and 6 not yet developed), 20 residential private pitches with temporary planning permission, and 7 pitches located on a unauthorised developments (1 pitch in Malvern Hills regarded as unauthorised and 6 pitches in Wychavon referred to by the local authority as tolerated pitches). There were 29 potential pitches (i.e. pitches with planning permission but which have not yet been developed) located in

⁹ See ONS 2011 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

Wychavon. There was one Travelling Showperson's yard located in Malvern Hills which provided 12 plots.

Qualitative research undertaken by the Joseph Rowntree Foundation in 2014, set out in 'Monitoring Poverty and Social Exclusion 2014', in terms of accommodation showed that a lack of appropriate trailer/caravan sites, combined with insufficient provision is having a significant detrimental impact on the lives of the Traveller community across the UK, with the poor quality being identified with corresponding problems, particularly for older people and those with young children. Due to a lack of stopping provision, many will leave their traditional lifestyle to move into conventional housing can produce social isolation and serious health issues due to cultural aversion to 'bricks and mortar' and separation from their community.

Education plays a central role in the social inclusion and well-being of Traveller children and their families. Yet, as above, travellers have the highest proportion of people with no qualifications for any ethnic group. The commonly given reason is prevalence of racist bullying, but where Traveller children do transfer to secondary school, their attendance is unlikely to continue beyond the age of 14.

Employment traditionally for Travellers has been self-employed, seasonal works and skilled labourers. However, many of the more traditional unskilled jobs had disappeared, such as seasonal work in agriculture. Scrap metal has been a traditional method of employment for many but revised legislation, the Scrap Metal Dealers Act 2013, allows local authorities to set licence fees to trade. Given the nomadic nature of travellers' lifestyle, working in a number of local authorities a number of licenses for each authority can make the business unviable.

According to the Census 2011, in Worcestershire 71.3% of people aged 16-74 were economically active, compared with 68.3% in West Midlands and the average across England of 69.9%. 39.2% of people worked full time, and 14.9% part time; this compares with 37.4% and 14.0% in West Midlands. 16.0% of people in Worcestershire aged 16-74 were retired compared with 14.4% in West Midlands and the figure for the whole of England of 13.7%. Gypsy or Irish Travellers had the lowest proportion of economically active at 47%, compared with 63% for England and Wales as a whole. Over half of those who were economically active were employed (51% compared to 75% for the total of England and Wales) and 20% were unemployed (compared to 7% for the whole of England and Wales). They had the highest proportion of self-employed out of the ethnic groups at 26% compared to 14% for England and Wales. Just over half were economically inactive; the most common reason was looking after the home or family (27%) which was higher than that for England and Wales (11%). For Gypsy or Irish Travellers (16 and over) in employment, elementary occupations (such as farm workers, process plant workers or service staff) were the most common type of employment at 22% (11% for England and Wales). The second highest occupation was skilled trades at 19% such as agricultural, electric and building trades, higher than England and Wales and all other ethnic groups.

5.2 Human Health

According to the 2011 ONS Census 8.1% of people in Worcestershire have long-term health problems or disabilities such that their day to activities are affected significantly, compared to 9.1% in West Midlands and 8.3% in England. 1.2% of people in Worcestershire defined their health as "very bad". This compares to average figures of 1.4% in West Midlands, and 1.2% in England. For national comparison Gypsy or Irish Travellers had the lowest proportion of people rating their general health as "very good" or "good" at 70% compared to 81% of the overall population of England and Wales (ONS, 2011).

Significant health inequalities exist between the Travellers and the general population in England. Poor living conditions are the most influential contributing factor to the poor health status, with poor quality or inappropriate accommodation exacerbating health conditions. In terms of children's health those from the Traveller community are more likely to experience early death, poor childhood development and limited access and uptake to health services.

Travellers are significantly more likely to have a long-term condition and suffer poorer health than the general population. Life expectancy has been estimated to be between 10 and 12 years less than the general population. Yet despite greater healthcare need, Travellers use mainstream health services less than others of the population often because of practical procedures for registering and accessing services.

5.3 Material assets

In Spring 2019, the GTAA records that there were 217 permanent Traveller pitches and 12 Travelling Showpeople plots within south Worcestershire:

- 131 authorised private pitches,
- 86 local authority managed pitches (plus 4 unoccupied)
- 1 Travelling Showperson's yard located in Malvern Hills which provides 12 plots.

In addition, there were:

- 30 transit pitches (24 with temporary planning permission and 6 not yet developed)
- 20 residential private pitches with temporary planning permission
- 7 pitches located on unauthorised developments (1 pitch in Malvern Hills regarded as unauthorised and 6 pitches in Wychavon referred to by the local authority as tolerated pitches)
- 29 potential pitches (i.e. pitches with planning permission but which had not yet been developed) located in Wychavon.

Table 5.2: Selected Site Allocations

	Malvern Hills	Worcester	Wychavon	Total
Local Authority Site	5	15	66	86
Housing Association Site	0	0	0	0
Private Site – Authorised	15	0	116	131
Private Site – Temporary Authorised **	8	0	12	20
Unauthorised	1	0	0	1
Unauthorised – tolerated	0	0	6	6
Total	29	15	200	244

5.4 Climatic factors

There is no specific data on the impacts of traveller sites or the traveller community on climate change. The traveller community would be expected to use the same resources (heating, electricity, car usage) as the settled population. It is expected that, due to lower levels on insulation in caravans, this may result in higher energy use requirements compared to the average. There may be potential for renewable sources of energy to be utilised on traveller sites.

5.5 Air

There are no directly recorded air quality issues with any of the sites identified, e.g., Air Quality Management Area designated by Worcestershire Regulatory Services. Any planning applications will need to comply with SWDP 31: Pollution and Land Instability within the adopted SWDP and incorporate any guidelines in the emerging Air Quality Supplementary Planning Document that is likely to be adopted in early 2023.

5.6 Biodiversity, flora and fauna

South Worcestershire has a high-quality environment with a number of important assets that include the Malvern Hills AONB and Cotswolds AONB that together cover 15,276ha. Part of the Abberley and Malvern Hills Geopark lies within the area within Malvern Hills. The northern parts



of Wychavon district are covered by the West Midlands Green Belt, which also covers areas to the north of Worcester city within the Worcester City administrative boundary. South Worcestershire contains 165 SSSI covering an area of approx. 15ha. There are two Special Areas of Conservation (SAC) in south Worcestershire, Bredon Hill and Lyppard Grange Ponds. There are 468 Special Wildlife Sites and 118ha of Area of Special Wildlife Sites.

5.7 Soils

Worcestershire County Council has published a technical research paper entitled Planning for Soils in Worcestershire (2011). Some 63% of Worcestershire soils fall within Grade 3 (Good/Moderate) and therefore this is the most common land typology that is subject to development pressure. The proposed allocated sites do not contain any Grade 1 or Grade 2 land under the Agricultural Land Classifications.

5.8 Landscape

Worcestershire County Council has produced the Worcestershire Landscape Character Assessment (2011) of the county and this information should be referred to when assessing site suitability. [[Landscape Character | Landscape Character Assessment | Worcestershire County Council](#)]

5.9 Cultural heritage

The settlements of south Worcestershire include a range of heritage assets, designated and non-designated, which are relevant to the area covered by the DPD. This area includes 105 Conservation Areas, and 5,344 listed buildings, as well as those identified on local lists. There are 38 structures identified on the Historic England 2020 Buildings at Risk Register.

In terms of the historic environment there are 163 Scheduled Monuments and 125 historic parks and gardens.

5.10 Water

The 2014 South Worcestershire Water Cycle Study (prepared for the SWDP) indicates that the Plan area is generally within a “water stressed region”. Most of the rivers within the area’s catchment are classified as “restricted water available for licensing”. Should all licensed water be abstracted there would not be enough water left for the environment, and as such no new licenses would be granted. Pershore and Evesham, on the River Avon catchment are in regions of “water available for licensing”. New licences may be considered in these areas but will be subject to



restrictions such as when water levels in the river drop below a certain threshold and environmental impacts downstream. Severn Trent Water (STW) is undertaking a detailed assessment of area. The study included predicted housing and commercial development looking forwards 25 years and included a total of 26,000 additional properties, based upon data provided by the local authority. STW are installing the necessary improvements to ensure network will be capable of meeting the predicted demands over this period and have also included investment in their new 5-year plan starting in April 2015 which will include a further analysis of the area. Notwithstanding the above investment etc. the Plan area is subject to pressures on water usage that needs to be taken into consideration when planning for future development.

Flood risk issues in Worcester relate to fluvial flooding from the River Severn, River Teme and the Barbourne Brook. Other flood risk issues in Worcester are localised surface water flooding and flooding in the Barbourne Brook catchment, caused by a possible combination of fluvial, surface and sewer flooding.

In Wychavon, flood risk is from the River Avon in Evesham and Pershore, the River Salwarpe, the Droitwich and Worcestershire canals and many small watercourses in the rural areas. In addition, surface water is an issue in many locations. A broad scale surface water sewerage model was developed as part of the original Level 2 SFRA for Droitwich prepared for the SWDP. This model confirmed that surface water discharge in some of the areas of the town will exacerbate flooding from the River Salwarpe. The main cause of flooding in Malvern Hills is local watercourses and surface water sewers. In particular, rapid response catchments are of concern, and as many of the watercourses at risk are less than 3km² in area there are no flood risk maps covering these areas.

5.11 Key Sustainability Issues

Table 5.4 presents the key issues of relevance to the South Worcestershire District and the DPD. The key issues are those which should be taken forward in the SA and reflected within an SA Framework of objectives and questions which form the scope of the subsequent assessment. The table presents the 13 SA objectives organised under SEA themes with the key baseline issues and the potential future baseline conditions without the Plan.

Table 5.3: SA Framework and Key Baseline Issues

SA Objectives	SEA Theme	SA Baseline Issues	Future Baseline Conditions
<p>SA1. To develop a healthy, active and diverse economy</p>	<p>Population</p>	<p>Relatively low employment rates in the Traveller community; therefore, there is a need to encourage employment.</p>	<p>Low employment levels are likely to remain below the settled population and will inevitably be affected by fluctuating economic cycles outside of the Plan’s control. Therefore, there is a need to encourage employment, particularly by providing enough on-site facilities for self-employment where possible and locating sites to services, facilities and markets.</p>
<p>SA2. To maintain and improve communities to meet the needs of the population and promote social inclusion</p>	<p>Population</p>	<p>Ease of access to retail, community and leisure facilities is often poor due to the location of sites – particularly those that are unauthorised. There are pockets of deprivation as a whole mostly in relation to access to local community services – this can lead to social exclusion.</p>	<p>Without the allocation of sites that are near to facilities and services, unauthorised or windfall sites may occur which would make it more difficult to integrate the traveller community with the settled community and could exacerbate social exclusion.</p>
<p>SA3. To provide for adequate on-site services for water supply mains electricity, waste disposal and foul and surface water drainage</p>	<p>Population, human health, material assets.</p>	<p>Existing sites being inefficient in terms of energy use, particularly caravans. Many sites also do not have access to a mains water supply which has knock-on implications for health.</p> <p>Water quality will need to be maintained and enhanced. Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.</p>	<p>The absence of planned allocations would limit Severn Trent Water ability to plan for future supply and provide the necessary infrastructure etc.</p> <p>Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.</p>

SA Objectives	SEA Theme	SA Baseline Issues	Future Baseline Conditions
<p>SA4. To promote quality design and sustainable construction for building and places</p>	<p>Material assets, human health, population.</p>	<p>A lack of appropriate trailer/caravan sites, combined with insufficient provision is having a significant detrimental impact on the lives of the Traveller community across the UK. The Traveller community have more health problems than the settled community – possibly due to inadequacies in living conditions.</p>	<p>The existing baseline situation is likely to prevail. Inadequacies in living conditions and insufficient provision of appropriate trailer/caravan sites could have a detrimental effect on the lives of the Traveller community. Unauthorised or windfall sites may not have access to existing services and facilities in nearby villages and towns.</p>
<p>SA5. To contribute towards improving the health and wellbeing of all</p>	<p>Human health, population.</p>	<p>The Traveller community have more health problems than the settled community – possibly due to the lack of health facilities accessible from sites, or due to inadequacies in living conditions. Due to a lack of stopping provision, many will leave their traditional lifestyle to move into conventional housing which can produce social isolation and serious health issues due to cultural aversion to ‘bricks and mortar’ and separation from their community.</p>	<p>The existing baseline situation is likely to prevail without any planning policies to improve the range of onsite services and facilities on sites for the traveller community. Unauthorised or windfall sites may not have access to existing services and facilities in nearby villages and towns.</p>
<p>SA6. To reduce the causes of climate change and adapt to its impacts</p>	<p>Climatic factors</p>	<p>Existing sites being inefficient in terms of energy use, particularly caravans. Many sites also do not have access to a mains water supply which has knock-on implications for health.</p>	<p>The existing baseline situation is likely to prevail without any planning policies to improve sustainability of permanent structure. Mains services may not be provided on unauthorised sites. Without the Plan there is little potential to improve impacts on climate change (e.g. install renewable energy generation) or resilience to climate change on sites.</p>

SA Objectives	SEA Theme	SA Baseline Issues	Future Baseline Conditions
<p>SA7. To minimise waste and promote recycling, reuse and recovery</p>		<p>Existing or unauthorised sites are likely to have the minimum waste collection and recycling collection provided by the local authority.</p>	<p>Without the Plan the existing baseline situation is likely to prevail. No improvements in waste and recycling through layout and design and proximity to existing waste recycling centres are likely to be achieved.</p>
<p>SA8. To reduce the need to travel and promote sustainable travel options</p>	<p>Climatic factors, air, human health.</p>	<p>A relatively young population, with inadequate access to educational facilities either due to the location of sites or a lack of places. This in turn has a direct effect on educational achievement.</p> <p>The Traveller community have more health problems than the settled community – possibly due to the lack of health facilities accessible from sites, or due to inadequacies in living conditions.</p> <p>Ease of access to retail, community and leisure facilities is often poor due to the location of sites – particularly those that are unauthorised. There are pockets of deprivation as a whole mostly in relation to access to local community services – this can lead to social exclusion.</p>	<p>Unauthorised or windfall sites may not have access to existing services and facilities in nearby villages and towns.</p>
<p>SA9. To improve, restore and recreate biodiversity and geodiversity</p>	<p>Biodiversity, flora, fauna, soils.</p>	<p>There is a need to maintain and enhance the high quality natural environment and biodiversity of the plan area.</p>	<p>Likely to remain broadly the same although without a Plan which allocates sufficient sites</p>

SA Objectives	SEA Theme	SA Baseline Issues	Future Baseline Conditions
SA10. To protect and enhance landscape and townscape character and quality	Landscape, cultural heritage.		then sites could have an impact as need overrides environmental considerations.
SA11. To protect and enhance the historic environment, historic character and quality of landscapes and townscapes	Cultural heritage	There is a need to maintain and enhance the high quality built and historic environment of the plan area.	Likely to remain broadly the same although without a Plan which allocates sufficient sites then sites could have an impact as need overrides environmental considerations.
SA12. To minimise pollution	Air, water, soil quality	There are potential adverse impacts from windfall or tolerated sites on air, water and soil quality.	Without the Plan there are no policies to help control or regulate these issues on new sites.
SA13. To manage water in a sustainable manner	Water, climatic factors	<p>The plan area is generally within a “water stressed region”. Water usage is increasing, putting further pressure on water resources.</p> <p>Water quality will need to be maintained and enhanced. Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.</p> <p>Flood risk is an issue across the plan area with it will be extremely important to ensure that development of sites for caravans are not within flood risk zones or areas with a history of flooding due to their vulnerable nature.</p>	May result in unplanned development that may be at risk from flooding. Planned growth will allow Environment Agency to incorporate necessary flood mitigation measures where appropriate.

5.12 Data Gaps

The baseline data was collected from a number of sources including Neighbourhood Statistics, district council records and survey work, and the 2019 WGTAA. Where possible the most up-to-date information available was used, however, some data sets, for example 2021 Census data, are not collected annually, therefore, some data sets are less reliable.

Not all of the data was available at district level, with some data sets only being published at county level, which made identifying trends within the districts difficult. In considering the national profile in relation to specific characteristics of the Traveller community it has been assumed that these are broadly reflective of the Worcestershire picture.

6 Alternatives

6.1 Introduction

This section describes how alternatives have been considered and assessed. The process followed for identifying proposed site allocations is described below. 21 reasonable alternatives sites have been assessed. 17 sites have been rejected. The reasons for selection and rejection can be found in Subsection 6.3 below.

Alternatives for policy approaches have also been assessed and these are also discussed in Subsection 6.2.

6.2 Policy Approach Alternatives

Table 6.1 identifies policy approaches which form the preferred DPD and alternative approaches which have been rejected. The reasons for selecting and rejecting policy options are provided in Table 6.1.

All of the selected approaches have been subject to SA through the assessment of the preferred DPD policies and allocations, the findings of which are presented in Section 7. A number of alternatives have been selected.

Some alternative approaches to policies in the DPD have been identified as part of the preparation of the DPD and they have been assessed previously as discreet options. The findings of the assessments (including all of the rejected alternatives) can be found in Appendix A. The SA Framework of sustainability objectives has been used to appraise the sustainability performance of the policy approach alternatives.

Table 6.1: Justifications for Selection and Rejection of Policy Approach Options

Policy Approaches	Reasons for Selecting or Rejecting Options
Travelling Showpeople	
Option 1: Rely on the Development Management process for plots to come forward and those sites to then be assessed against the criteria provided in the Site Allocations DPD.	Select - Three calls for sites exercises have not resulted in the submission of additional Travelling Showpeople plots in Malvern Hills (where the need is). Undertaking further calls for sites would delay meeting the need for Traveller pitches in the DPD and may not result in additional plots coming forward. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 2: Undertake a further call for sites	Reject - Three calls for sites exercises have been undertaken and it is not anticipated that a further call for sites would generate further sites not already considered, but it would further delay meeting the need for Traveller pitches in the DPD. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 3: Use the allocated site at Rushwick expanded settlement for Travelling Showpeople for 10 plots	Select – The requirements of Travelling Showpeople are different from Travellers, in part because Showmen need land to store and maintain fairground equipment. The site at Rushwick expanded settlement offers the potential for sufficient land and good access to the primary road network to better meet the needs of Travelling Showpeople. Assessed as part of the preferred DPD.
Transit Sites	
Option 1: Allocate 5 transit pitches at Shorthill Caravan site, Crossway Green.	Reject – this site is no longer proposed as an allocation for transit or residential pitches because it is considered too large to allocate (more than 10 pitches in total)

	and therefore likely to be difficult to manage effectively. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 2: Allocate 24 transit pitches at Shorthill Caravan site, Crossway Green.	Reject – this site is no longer proposed as an allocation for transit or residential pitches because it is considered too large to allocate (more than 10 pitches in total) and therefore likely to be difficult to manage effectively. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 3: Rely on the Development Management process for permanent transit sites to come forward and those sites to then be assessed against the planning criteria in the Site Allocations DPD.	Select - Three calls for sites exercises process have not resulted in the submission of suitable transit sites. Undertaking further calls for sites would delay meeting the need for Traveller pitches in the DPD and may not result in additional transit sites coming forward. Potential sites coming through the Development Management process would be assessed against the criteria provided in the Site Allocations DPD. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Meeting the Need for Developable Pitches and Plots in years six to ten	
Option 1: The SWDP allocates up to 20 pitches on the urban extensions set out in policies SWDP 17 - one at Worcester South (SWDP45/1) and the other at Worcester West (SWDP45/2) with up to 10 pitches on each site. This remains an option for years 6 to 10 (2024/25 to 2028/29).	Select – Planning permissions granted on the Worcester urban extensions to date have not included on-site Traveller provision but an off-site contribution towards the provision of Traveller facilities. Nevertheless, it is considered essential that reference to on-site provision remains within policies SWDP45/1 and 45/2 for new full applications which come forward. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 2: Windfall development proposals to be assessed in accordance with the planning criteria in the	Reject – Following an advisory meeting with the Planning Inspectorate in October 2021 it was considered that a requirement for sites to be within 800m of a town or

<p>Site Allocations DPD, including within 800m of a town or Category 1, 2 or 3 settlement</p>	<p>Category 1, 2 or 3 settlement may be too prescriptive. Assessed as an alternative as part of the DPD preparation – see Appendix A.</p>
<p>Option 3: Carry forward surplus need from years 1 to 5 (from the planning permissions that have been granted to date, 49 in total) with 19 pitches to be carried forward to years 6 to 10)</p>	<p>Select – Planning permissions granted through the Development Management Process since March 2019 should count towards the supply of pitches to meet the needs of Travellers.</p>
<p>Option 4: Extra pitches allocated in the DPD.</p>	<p>Select –The DPD allocates new pitches on existing sites with reasonable access to local services. Assessed as part of the preferred DPD.</p>
<p>Option 5: Windfall development proposals to be assessed in accordance with the planning criteria in the Site Allocations DPD, including within 2 km of a primary school.</p>	<p>Select –The Government’s Planning Policy for Traveller sites says that local planning authority policies for Traveller sites should promote access to appropriate health services and ensure that children can attend school on a regular basis.</p> <p>It is considered that 2km from a primary school but with some flexibility (to 2.5km in the event that too few sites fall within the 2km) would be appropriate to enable more sites to come forward within walking distance of a primary school.</p> <p>Windfall developments would be assessed against the criteria set out in policy T1D and policy T2 of the Traveller DPD. Assessed as part of the preferred DPD.</p>
<p>Other Planning Matters</p> <p>Tenure of new Pitches and Plots</p>	
<p>Option 1: Rely on a sufficient supply of private pitches coming forward through the Development Management process.</p>	<p>Select - The majority of pitches applied for through the Development Management process are for privately owned or privately rented pitches – there are very few new</p>

	social-rented pitches. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 2: Plan for socially-rented pitches / plots on sites allocated in the urban extensions and/or new settlements.	Select - The Councils are working towards ensuring that at least some of the pitches on the new Traveller sites at the new urban extensions are socially-rented to ensure a mixture of new public and private sites or yards. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Nomadic Habit of Life	
Option 1: Seek to meet the need for pitches based on the Government’s definition of Travellers in Planning Policy for Traveller Sites	<p>Select – Annex 1 of the Government’s Planning Policy for Traveller Sites (2015) sets out the definition of “gypsies and travellers” and “travelling showpeople” for the purposes of planning policy. The definitions exclude those who have ceased to travel permanently.</p> <p>In line with para 62 of the NPPF, the south Worcestershire SHMA will assess the needs of travellers (including caravan and houseboat dwellers) who do not meet the definition given in Annex 1 of the PPTS. Assessed as an alternative as part of the DPD preparation – see Appendix A.</p>
Option 2: Seek to meet the need for pitches based on “cultural need” (ie, those that consider themselves to culturally be Travellers, even if they no longer lead a nomadic habit of life)	Reject - The new Traveller sites on the new settlements will help to meet the needs for this group, particularly those in need of social rented pitches. In accordance with of the Government’s Planning Policy for Traveller Sites (2015), the GTAA in determining whether persons were “gypsies and travellers” for the purposes of planning policy, the GTAA considered a) whether they previously led a nomadic habit of life, b) the reasons for ceasing their nomadic habit of life, and c) whether there was an intention of living a nomadic habit of life in the future, and if so, how soon and in

	what circumstances. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Rural Exception Sites	
Option 1: To meet the need for affordable Traveller pitches, include a specific policy which supports Traveller sites in small rural communities in locations that would not normally be considered suitable for Traveller sites.	Reject - Nearly all of the Traveller sites coming through the Development Management process in South Worcestershire are for private family sites and are therefore not meeting the needs of those households who cannot afford private sites. The Council's consider that it is not necessary to have a specific policy for 'rural exception' Traveller sites because such applications can be assessed against the planning criteria in the Site Allocations DPD. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Option 2: Do not include a specific policy for rural exception Traveller sites within the DPD	Select - The need for affordable Traveller pitches can be addressed on Traveller sites in the strategic allocations / urban extensions. Further, applications for rural exception Traveller sites can be against the planning criteria in the Site Allocations DPD. Assessed as an alternative as part of the DPD preparation – see Appendix A.
Safeguarding of Sites	
Option 1: Safeguard sites with planning permission (where there is no personal occupancy restriction) in perpetuity for Traveller and Travelling Showpeople accommodation use.	Select – Sites with planning permission (where there is no personal occupancy restriction) will be safeguarded in perpetuity for Traveller and Travelling Showpeople accommodation use. to ensure that Traveller site provision is not lost to other forms of development. Assessed as an alternative as part of the DPD preparation – see Appendix A.

Option 2: Do not safeguard existing sites for Traveller and Travelling Showpeople accommodation use.

Reject – To ensure that Traveller and Travelling Showpeople site provision is not lost to other forms of development. Assessed as an alternative as part of the DPD preparation – see Appendix A.

6.3 Identification of Reasonable Site Allocation Alternatives

The information in this section has been taken from the TTSPS DPD Further Revised Site Assessment Background Report (November 2021) prepared by the South Worcestershire Councils.

The Government's Planning Policy for Traveller Sites (DCLG, 2015) states that local planning authorities should, in producing their Local Plan "*identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets*". Further, Local Plans should "*identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15*".

Planning Policy for Traveller Sites says that to be deliverable, sites should:

- Be available now,
- Offer a suitable location for development now, and
- Be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development on the site is viable.

To be considered developable, sites should be in a suitable location for Traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

Planning Policy for Traveller Sites also says that "*criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community*" (DCLG, 2015).

The methodology used to identify reasonable alternative sites by the South Worcestershire Councils has been designed to be consistent with national planning policy (NPPF, 2021), Policy SWDP17 in the South Worcestershire Development Plan (SWDP, 2016) and Designing Gypsy and Traveller Sites Good Practice Guide (Communities and Local Government, 2008). SWDP17 includes criteria against which planning applications for Traveller and Travelling Showpeople sites will be assessed.

Potential alternative sites were identified from the following sources:

- Investigation of land owned by the councils for use as a Traveller site;
- Investigation of sites submitted for housing and/or employment to the Call for Sites for the South Worcestershire Development Plan Review (SWDPR), which lay within 800m of Malvern, Tenbury Wells, Upton-upon-Severn or Malvern's Category 1 villages; and
- Three "calls for sites" exercises: February to March 2015, November 2016 – January 2017 and October – November 2020.

The investigations relating to the first two bullets listed above did not identify any suitable sites.

The call for sites exercises provided an opportunity for individuals and organisations to suggest sites that they considered might be suitable for allocation as a Traveller or Travelling Showpeople site. It was made clear that proposals could be for either new sites or an expansion or intensification of an existing site. Proposals were invited for permanent residential sites or transit sites / temporary stopping places – although it should be noted that the latest GTAA (Oct 2019) suggests that transit or temporary stopping places are not required due to the Joint Protocol for The Management of Unauthorised Encampments of Gypsies and Travellers on Local Authority Land in Worcestershire¹⁰ currently operative across Worcestershire.

It was also made clear that all sites submitted would undergo a rigorous assessment against specific criteria to assess their potential suitability. Submitting a site for consideration was not a guarantee that it would be found suitable or that it would be allocated as part of the emerging DPD. It was also explained that any sites that were included within the DPD would still be required to follow the normal planning procedures in securing planning permission.

Individuals and organisations that were invited to submit sites in the “call for sites” included:

- All Gypsy, Traveller and Travelling Showpeople households on authorised (permanent and temporary) and unauthorised Traveller and Travelling Showpeople sites in south Worcestershire.
- All registered caravan parks owners in south Worcestershire.
- Public sector landowners, including the District and County Councils and Housing Associations.
- Landowners who put land forward for consideration as potential housing allocations in the Strategic Housing Land Availability Assessment (SHLAA).

Additionally, a Press Release was issued to raise awareness so that others might put sites forward if they desired to do so.

17 site submissions were received in the first call for sites – which are summarised in Table 6.2 below. Additionally, the potential suitability of the only Traveller site in south Worcestershire (at Crossway Green), which had temporary planning permission at the time and no conditions limiting the site to named individuals, was also considered.

In addition, land at Broomhall Community and Norton Barracks Community (the proposed Worcester South urban extension) and land at Temple Laugherne (the proposed Worcester West urban extension) were also considered for their suitability for accommodating Traveller sites – but at the time no specific land parcels were identified as being suitable, available and deliverable and subsequently off-site contributions towards the provision of new Traveller

¹⁰ Joint Protocol for the Management of Unauthorised Encampments of Gypsies and Travellers on Local Authority Land in Worcestershire [[Gypsies and Travellers Downloads | Worcestershire County Council](#)]

itches were agreed as an alternative for the planning applications that have been approved so far.

21 site submissions were received in the second call for sites. The second call for sites included two sites which had previously been submitted in the first call for sites and a site at Baughton that was submitted twice. The second call for sites also included three sites which were either located within the proposed urban extensions or on sites beyond the urban extensions in lieu of sites on the urban extensions.

Ten site submissions were received in the third call for sites.

Four other sites were submitted at various times including during the 2021 Preferred Options consultation. One was the site at Broomhall Way, Worcester (previously submitted in the third call for sites) which was accompanied by further information on the highway arrangements from A4440 and therefore required the site to be reconsidered.

The second stage involved a desk-based assessment of suitability criteria, together with an initial investigation of likely availability.

This stage sieved out immediately sites which were likely to fail on the grounds of either the site being unavailable for Traveller or Travelling Showpeople purposes or potential sites contravening major constraints such as being within planning designations, areas prone to flooding, on contaminated land etc.

The accessibility of a site was measured in relation whether it was within 2km of a primary school to help encourage children to attend school on a regular basis which is in accordance with one of the objectives of the Planning policy for Traveller sites.

The initial site availability and suitability assessment is summarised in Tables 5a to 5d of the TTSPS DPD Further Revised Site Assessment Background Report (September 2022).

If a site could not satisfy all of the essential suitability and availability criteria it was rejected. All other sites not rejected in the Initial Availability and Suitability Assessment were taken forward to be considered at the next stage, the Detailed Site Assessment.

The sites which went forward into the Detailed Site Assessment are all considered reasonable alternatives with regards to the SA. Four sites passed the Detailed Site Assessment documented within the TTSPS DPD Further Revised Site Assessment Background Report (September 2022) and have been selected as site allocations. These sites are listed in Table 6.2. All of these sites have been subject to assessment against the SA Framework of sustainability objectives.

The findings of the SA of the rejected sites are summarised in the table below and details are provided within Appendix A. The key to the symbols within the table can be found within Table NT2.2.

Table 6.2: Reasonable Alternative Sites

Reasonable Alternative Sites
Hillbee Farm, Upton Upon Severn
Acton Villa, Acton, Ombersely
Comhampton Lane, Dunhampton, Ombersley
Former caravan storage site, Land off A449, Crossway Green
The Hill, Canada Bank, Charlton (selected)
Land off Narrowway Lane, Crossway Green
Orchard View, Evesham Rd, Fladbury
Mountain View, Bastonford
Badsey Road, Aldington
Orchard View, Main St, Aldington
Hughes Barn, Bretforton Rd, Badsey
Shorthill Caravan Park, Crossway Green
Plot 2 The Paddocks, Comhampton Lane, Comhampton, Ombersley
Plot 4 The Paddocks, Comhampton Lane, Comhampton, Ombersley
Main Road, Kempsey
Land at Lower Moor, north of the A44
Land at Lower Moor, south of the A44
Land at Broomhall Way, south of A4440, Worcester
The Paddocks, Newland, Malvern (selected)
The Orchard, Knowle Hill, Evesham (selected)
Blossom Hill, Village Street, Aldington (selected)

Table 6.3: Summary Sustainability Performance of Rejected Reasonable Site Alternatives at the Regulation 18 Stage

Reasonable Alternative Sites	Sustainability Performance Against SA Objectives												
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13
Hillbee Farm, Upton Upon Severn	0	+	0	-	+	-	?	+	0	0	0	0	0
Acton Villa, Acton, Ombersely	0	-	0	-	-	-	?	-	0	0	0	0	0
Comhampton Lane	0	-	-	-	-	-	?	-	?	0	0	0	0
Land off Narrowway Lane, Crossway Green	0	+	-	-	+	-	?	-	?	0	0	0	0
Orchard View, Evesham Rd, Fladbury	0	-	-	-	-	-	?	-	?	0	0	0	0
Shorthill Caravan Park, Crossway Green	0	+	0	-	+	-	?	-	0	0	0	0	0
Mountain View, Bastonford	0	+	0	-	+	-	?	0	0	0	0	0	0
Badsey Road, Aldington	0	+	-	-	-	-	?	-	?	-	0	0	0
Orchard View, Main Street, Aldington	0	-	-	-	-	-	?	-	?	0	0	0	0
Hughes Barn, Bretforton Rd, Badsey	0	+	-	-	+	-	?	+	?	-	0	0	0
Former caravan storage site, Land off A449, Crossway Green	-	+	0	-	+	-	?	-	?	-	0	0	0

Reasonable Alternative Sites	Sustainability Performance Against SA Objectives												
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13
Plot 2 The Paddocks, Comhampton Lane, Comhampton, Ombersley	0	-	-	-	-	-	?	-	?	0	0	0	0
Plot 4 The Paddocks, Comhampton Lane, Comhampton, Ombersley	0	-	-	-	-	-	?	-	?	0	0	0	0
Land at Broomhall Way, South of A4440, Worcester	0	+	-	-	-	-	?	-	0	-	0	0	-
Main Road, Kempsey	0	+	-	-	+	-	?	+	-	0	0	0	0
Land at Lower Moor, North of the A44	0	+	-	-	+	-	?	-	0	0	0	0	0
Land at Lower Moor, South of the A44	0	+	-	-	+	-	?	-	0	0	0	0	0

6.3.1 Selection of Site Allocations

The Detailed Site Assessment considered suitability, achievability and sustainability issues. The potential capacity of sites was also considered.

The Detailed Site Assessment helped determine the suitability of a site against the following essential criteria:

- Whether the land is relatively flat and stable;
- Whether the site has (or has potential of) safe and convenient access to the highway network;
- Whether there is likely to be any significant adverse visual impact which could not be adequately minimised;
- Whether there is likely to be a significant adverse impact on privacy and residential amenity for either site residents or neighbouring properties that could not be mitigated; and
- Whether the site is likely to be capable of providing adequate on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.

If a site could not satisfy all of the essential suitability and availability criterion it was rejected. In addition to the essential criterion, sites were also assessed against the following criteria “desirable” suitability criterion. Whilst a failure to meet the criteria listed below may not, in themselves, preclude the development of Traveller and Travelling Showpeople sites, they are important considerations which could assist in assessing the sustainability of sites and prioritising between a choice of potential sites:

- Whether local services and facilities such as schools and health facilities are reasonably accessible;
- Whether it would be an extension to an existing site or a new site; and/or
- Whether the site would be on previously developed land.

The results of the Detailed Site Assessment are summarised in Tables 6a to 6d of the TTSPS DPD Further Revised Site Assessment Background Report (September 2022).

The sites listed in Table 6.4 passed the Detailed Site Assessment undertaken by the South Worcestershire Councils and it was concluded that they meet, or have the potential to meet, the essential suitability criteria for Traveller or Travelling Showpeople sites. It was concluded that they meet, or have the potential to meet, the essential suitability criteria for Traveller or Travelling Showpeople sites and therefore have been selected as allocations for Traveller pitches.

Table 6.4: Selected Site Allocations

Site Name and Location	District	New or Existing Site	Potential No. New Pitches	For Traveller or Travelling Showpeople use
The Hill, Canada Bank, Charlton	Malvern	Existing	4	Traveller
The Orchard, Knowle Hill, Badsey	Wychavon	Existing	2	Traveller
The Paddocks, Newlands	Wychavon	Existing	See below*	Traveller
Blossom Hill, Village St, Aldington*	Wychavon	Existing	See below**	Traveller
South Worcs Total			6	Traveller

* The Orchard, Knowle Hill, Evesham (please note the 5 pitches (3 new and 2 unauthorised but tolerated pitches) from this site have already been taken into account in the supply of pitches calculations. The site 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 the 5 already granted planning consent)

** Blossom Hill, Village St, Aldington (please note the 4 pitches from this site have already been taken into account in the supply of pitches calculations. The site 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 the 4 already granted planning consent)

In addition to the allocation sites listed in Table 6.4, although no actual sites have been identified, the DPD proposes in Policy T1(C) that the two large urban extensions at Worcester South (SWDP45/1) and Worcester West (SWDP45/2) within the adopted South Worcestershire Development Plan (2016) shall each include a Traveller site of up to 10 pitches. The Strategic Allocation Worcestershire Parkway proposed within the SWDP Review (Regulation 19 Publication version of the SDWP Review, September 2022) shall also include 2 Traveller sites and also the proposed Strategic Allocations at Rushwick and Throckmorton Airfield shall both include 1 Traveller site. Each site is to have 10 pitches¹¹ and to be sited within the allocation boundaries in the locations¹² as defined in the masterplans for each new settlement.

¹¹ The new Traveller site at Rushwick Expanded Settlement can be for either Travelling Showpeople or Travellers.

¹² Generally, Traveller sites within Significant Gaps would not be appropriate unless exceptional circumstances can be demonstrated at the masterplanning and / or planning application stage.



The assessment of Policy T1 has considered the location of Traveller sites within the strategic Allocations and the urban extensions. The allocation of these locations has been subject to SA and HRA screening and further information can be found here:

- South Worcestershire Development Plan (2016):
<https://www.swdevelopmentplan.org/swdp-2016/swdp-core-documents>
- South Worcestershire Development Plan Review:
<https://www.swdevelopmentplan.org/consultations>

7 Potential Sustainability Effects of the DPD

7.1 Introduction

This section presents the potential sustainability effects of the three policies within the DPD:

- Policy T1: Meeting the Needs of Travellers and Travelling Showpeople
- Policy T2: Traveller Site Allocations
- Policy T3: Design of Traveller Sites and Travelling Showpeople Yards

As well as significant positive and negative effects, uncertain effects are also considered to be significant.

Policies T1 and T3 have been assessed together in one assessment table. Policy T2 allocates sites. The assessment of Policy T2 therefore consists of an assessment table for each site allocation.

This section is supported by Appendix B which presents the detailed assessments of the policies, including the potential nature of effects.

7.2 Sustainability Effects of the Policies

Tables 7.1 and 7.2 present summaries of the potential effects of the policies. A potential significant positive effect is identified in relation to SA Objective SA3 because both policies T1 and T3 will ensure that adequate on-site services for water supply mains electricity, waste disposal and foul and surface water drainage will be provided on Traveller Sites and Travelling Showpeople Yards.

Three uncertain effects are identified in relation to Policy T1 and the delivery of pitches Traveller sites within the strategic allocations of the 2016 adopted South Worcestershire Development Plan (Worcester South and Worcester West) and strategic allocations Worcestershire Parkway, Rushwick and Throckmorton Airfield within the SWDPR 2021-2041 Publication version (September 2022). The concept plan accompanying the policies for these strategic allocations indicates a suggested position for the location of the Traveller sites which may be modified through the masterplanning process. The SA Report accompanying the SWDPR Publication version (Lepus Consulting, August 2022) identifies some potential minor negative effects of the strategic allocations on biodiversity, landscape and cultural heritage. Due to the unknown locations of the Traveller sites within the strategic allocations, and until the masterplanning processes are completed, uncertain effects have been identified for SA Objectives 9, 10 and 11.

There are no potential significant effects identified in the assessments of the site allocations policy (Policy T2).

Table 7.1: Summary Sustainability Performance of Policies T1 and T3

Policies Assessed	Sustainability Performance Against SA Objectives												
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13
Policies T1 and T3	+	+	++	-	+	+	+	-	?	?	?	0	0

Table 7.2: Summary Sustainability Performance of Selected (allocation) Site (Policy T2)

Policies Assessed	Sustainability Performance Against SA Objectives												
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13
The Hill, Canada Bank, Charlton	0	-	+	-	-	-	0	-	0	0	0	0	0
The Paddocks, Newland, Malvern	0	-	+	-	+	-	0	-	0	0	0	0	0
The Orchard, Knowle Hill, Evesham	0	+	+	-	+	-	0	-	0	0	0	0	0
Blossom Hill, Village Street, Aldington	0	+	+	-	+	-	0	-	0	0	0	0	0

7.3 Potential Cumulative Effects

7.3.1 Potential Cumulative Effects of the draft DPD Policies and Site Allocations

This section presents a discussion of potential cumulative effects identified from the assessment of the DPD policies. No uncertain or potentially significant cumulative effects are identified, only potential minor cumulative effects.

‘SA2: To maintain and improve communities, to meet the needs of the population and promote social inclusion’

A potential minor positive cumulative effect is identified in relation to objective SA2 as the following sites are predicted to result in positive effects in relation to integrated co-existence with settled communities and social inclusion:

- The Orchard, Knowle Hill, Evesham; and
- Blossom Hill, Village Street, Aldington.

‘SA4: To promote quality design and sustainable construction for building and places’ and ‘SA6. To reduce the causes of climate change and adapt to its impacts’

Potential minor negative effects for all sites / locations have been identified against SA objectives SA4 and SA6 which could result in a potential minor negative cumulative effect in relation to sustainable construction and the causes of climate change, through increasing emissions of greenhouse gases. The level of impact depends on building materials used, construction methods, transport and design.

The potential cumulative effects are minor negative due to a low magnitude of effect (there are relatively few travellers’ pitches proposed across the plan area and the amount of construction resulting from the plan will be minimal).

‘SA8: To reduce the need to travel and promote sustainable travel options’

A number of potential negative effects have been identified in the site assessments in relation to sustainable travel. The allocation of those allocation sites could lead to increased emissions to air which could also contribute to the causes of climate change:

- The Hill, Canada Bank, Charlton;
- The Paddocks, Newland, Malvern;



- The Orchard, Knowle Hill, Evesham; and
- Blossom Hill, Village Street, Aldington.

A potential minor negative cumulative effect is therefore identified in relation to SA8.

7.3.2 Potential Cumulative Effects of draft DPD with other Plans and Projects

Table 7.3 below outlines the potential significant positive and significant negative cumulative effects which could arise from the implementation of the DPD in combination with other plans. Potential cumulative effects arising from the DPD in combination with other projects have been considered, but no significant cumulative effects were identified. Therefore, none have been reported here.

Table 7.3: Potential Cumulative Effects with other Plans

Plans and programmes	Potential significant positive effects	Potential significant negative effects
Neighbouring Local Development Frameworks (Wyre Forest, Bromsgrove, Redditch)	<ul style="list-style-type: none"> Improved housing provision for all, including affordable housing, housing for elderly people and sites for Travellers and Travelling Showpeople. 	<ul style="list-style-type: none"> Increased pressures on open/green space and biodiversity assets from recreation, disturbance and direct development. Overall growth in greenhouse gas emissions from a growth in traffic/transport and emissions from the built environment. Increase overall in coverage of impermeable services, with potential contributions to flood risk in the long term.
Community Strategies (Sustainable Community strategy for Worcestershire, 2011-2021)	<ul style="list-style-type: none"> Improved delivery of neighbourhood level community services and facilities. Cumulative benefits for health, wellbeing and equality aims, through improvements to access/provision of facilities including for sport and recreation. Enhanced community cohesion through both locations of sites in the DPD and the provision of services for all. 	None identified.
South Worcestershire Development Plan, 2016	<ul style="list-style-type: none"> Land for Travellers and Travelling Show People is clearly designated and signposted in policy. This should help to ensure there is clear provision to meet identified needs across the South Worcestershire area. 	<ul style="list-style-type: none"> Increased loss of greenfield land resulting from the development of sites for residential and employment use, including DPD sites.

<p>South Worcestershire Development Plan Review, Publication Version 2022</p>	<ul style="list-style-type: none"> • Housing provision. • Employment opportunities. • Multi-functional green infrastructure network. • Promoting good physical and mental health and wellbeing. • Community Cohesion. 	<ul style="list-style-type: none"> • Reduction in air quality. • Increased pollutant emissions, including greenhouse gases. • Fragmentation of the ecological network. • Increased risk of urbanisation of the open countryside and coalescence. • Loss of tranquillity. • Increased household waste generation. • Loss of soil resources, including BMV land. • Impacts on the Cotswolds NL and Malvern Hills AONB. • Alteration of landscape character. • Increased demand for water and wastewater management.
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8 Mitigation and Enhancement Measures for Policies and Site Allocations

8.1 Introduction

Mitigation and enhancement measures were put forward in the assessment of the site allocation alternatives at the Regulation 18 stage. Where they have been taken on board within the DPD policies, this has been noted within the selected site allocation assessments in Appendix B and the potential effects adjusted where the measures make a difference to sustainability performance. A number of mitigation measures remain, however, and these have either been identified in the assessment of policies T1 and T3 which have only been assessed at the regulation 19 stage, or where mitigation put forward at the Regulation 18 stage has not been incorporated into the DPD.

8.2 Mitigation Measures

SA6: To reduce the causes of climate change and adapt to its impacts

An uncertain effect was identified in the assessment of policies T1 and T3 and several potential minor negative effects identified in the assessment of Policy T2 (site allocations).

In order to reduce the uncertain effect, the policies should encourage low emission lifestyles such as encouraging installation of electric vehicle charging points and domestic renewable energy generation on site. This mitigation measure has now been taken on board in the wording of Policy T3 which has removed the uncertainty from the assessment of Policy T3 and improves the performance of policies T1 and T3 from uncertain to a potential minor positive effect.

Ensuring sites are resilient to climate change could be emphasised within the policies, particularly Policy T3 which addresses the design of sites. Consideration could be given to the resilience of buildings on site as well as utility supplies in the light of anticipated climate change.

The DPD could encourage the use of sustainable construction techniques and sustainable materials. The plan policies should encourage the careful consideration of layout, design and landscaping to mitigate against extremes in weather and climate.

SA4: To promote quality design and sustainable construction for building and places

A potential minor negative effect has been identified in all of the selected site allocations assessments (i.e. Policy T2). In order to address this potential effect, the DPD could include a policy encouraging quality design and the use of sustainable construction techniques.

SA9. To improve, restore and recreate biodiversity and geodiversity

An uncertain effect is identified in relation to Policy T1 and the delivery of pitches Traveller sites within the strategic allocations of South Worcestershire Development Plan (Worcester South and Worcester West) and proposed strategic allocations Worcestershire Parkway, Rushwick and Throckmorton Airfield. Through the SWDPR strategic allocations masterplanning process, biodiversity net gain should be achieved for the entirety of the strategic allocations including the pitches to be provided as part of them. This should follow the mitigation hierarchy and avoid loss of biodiversity as far as possible in the first instance.

SA10. To protect and enhance landscape and townscape character and quality

An uncertain effect is identified in relation to Policy T1 and the delivery of pitches Traveller sites within the strategic allocations of South Worcestershire Development Plan (Worcester South and Worcester West) and proposed strategic allocations Worcestershire Parkway, Rushwick and Throckmorton Airfield. Through the SWDPR strategic allocations masterplanning process ensure that potential negative effects on landscapes and townscapes are minimised and mitigated through appropriate design.

SA11. To protect and enhance the historic environment, historic character and quality of landscapes and townscapes

An uncertain effect is identified in relation to Policy T1 and the delivery of pitches Traveller sites within the strategic allocations of South Worcestershire Development Plan (Worcester South and Worcester West) and proposed strategic allocations Worcestershire Parkway, Rushwick and Throckmorton Airfield. Through the SWDPR strategic allocations masterplanning process ensure that heritage assets are protected and appropriate design mitigation put in place to avoid negative effects.

Other potential minor negative effects identified in the assessments of sites relate to the isolated nature of some sites and no mitigation can be put forward to address these potential negative effects.

9 Proposed Monitoring Arrangements

The SEA Regulations require monitoring of the significant environmental effects of implementing the DPD. SA monitoring should cover the significant economic, environmental and social effects identified in the assessment of the plan.

Table 9.1 sets out the proposed measures for monitoring. The monitoring procedures proposed are linked to the SA process and the monitoring currently underway and reported annually on the South Worcestershire Development Plan (2016).

The policies and objectives of the DPD will be delivered in the context of the South Worcestershire Development Plan as a whole and within the wider policy framework that sits alongside the planning system. For this reason, monitoring the sustainability effects of implementing the DPD will be undertaken and conducted as part of the overall approach to monitoring undertaken by the South Worcestershire Councils.

The provisions on monitoring apply after the DPD has been adopted, and therefore the monitoring proposals set out in the following table are a draft framework. The final SA monitoring programme will be included in the SA adoption statement (once the DPD is adopted).

Table 9.1: Proposals for Monitoring the Sustainability Effects of Implementing the DPD

Potential significant effects	What needs to be monitored?	What sort of information is required?	Indicators
Potential significant negative cumulative effect on open/green space, biodiversity assets and greenfield land.	Whether any Traveller and Travelling Showpeople Developments take place on greenfield land, or in close proximity to local greenspaces.	Quantitative data on the use of local green spaces, as well as the condition of these sites over time.	<ul style="list-style-type: none"> • Planning applications objected to by Natural England on the grounds of local biodiversity degradation • Hectares of greenfield land developed.
Potential significant negative cumulative effect on greenhouse gas emissions from a growth in traffic/transport and emissions from the built environment.	Whether any Traveller and Travelling Showpeople Developments take place in areas with poor public transport access.	Quantitative data on local air quality, public transport access and utilisation by Travellers and Travelling Showpeople.	<ul style="list-style-type: none"> • Local air quality indicators • Public transport utilisation data.
Uncertain effect on biodiversity from Travellers sites within the strategic allocations.	Whether planning permission is granted for Travellers sites within the strategic allocations.	Planning conditions relating to biodiversity.	<ul style="list-style-type: none"> • Completion of the BNG Metric to the satisfaction of the planning authority.
Uncertain effect on landscape and townscape from Travellers sites within the strategic allocations.	Whether planning permission is granted for Travellers sites within the strategic allocations.	Planning conditions relating to landscape.	<ul style="list-style-type: none"> • Discharge of planning obligations.
Uncertain effect on heritage assets from Travellers sites within the strategic allocations.	Whether planning permission is granted for Travellers sites within the strategic allocations.	Planning conditions relating to heritage assets.	<ul style="list-style-type: none"> • Discharge of planning obligations.



10 Next Steps

This SA Report is being published for consultation alongside the Regulation 19 version of the DPD.

Following consultation on both this report and the DPD, comments received on both the plan and this SA Report will be considered. Should modifications be required following Regulation 19 consultation, these will be submitted to the Secretary of State with the DPD and this SA Report.

As soon as possible after adoption of the DPD, an SA adoption statement will be published.