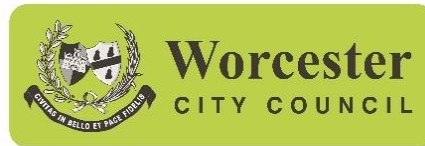




**South Worcestershire  
Traveller and Travelling Showpeople  
Policy and Site Allocations  
Development Plan Document**

**Regulation 19 Stage Sustainability Appraisal  
Report - Non-Technical Summary**



**Date:** 12<sup>th</sup> October 2022

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## Quality Management

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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"> <li>• Continual; or</li> <li>• Defined by number of occurrences (e.g. per annum); or</li> <li>• Intermittent.</li> </ul>
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

This is the non-technical summary of the Sustainability Appraisal (SA) Report which presents the detailed assessment of potential environmental, social and economic effects of the South Worcestershire Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD).

The South Worcestershire Councils (SWC) of Malvern Hills, Worcester City and Wychavon District Councils have been working together 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, 2015<sup>1</sup>) and the 2021 National Planning Policy Framework (NPPF<sup>2</sup>; 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 DPD that will complement the policies in the SWDP. The DPD allocates sites to meet the housing needs of Traveller and Travelling Showpeople in south Worcestershire. As part of the preparation of the Traveller and Travelling Showpeople Site Allocations DPD there is a requirement to assess the sustainability of the DPD and prepare a SA Report.

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.

The SA Report has been prepared on behalf of the South Worcestershire Councils (SWC) by ClearLead Consulting Ltd. The SA Report (and this summary) are being published and consulted on alongside the DPD.

### 1.1 Habitats Regulations Assessment

A separate assessment which relates to internationally designated wildlife sites, a Habitats Regulations Assessment (HRA), has also been undertaken and a HRA Screening Report prepared. There is a requirement in legislation for the SA to consider potential effects on

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

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



internationally designated wildlife sites and the HRA therefore provides information for the SA. The HRA Screening Report (October 2022) can be found on the SWDP website: [South Worcestershire Development Plan - South Worcestershire Development Plan \(swdevelopmentplan.org\)](http://swdevelopmentplan.org)

HRA Screening has been undertaken in an iterative manner as the DPD has been developed. Two internationally designated wildlife sites have been considered for potential significant effects from the DPD and these are:

- Lyppard Grange Ponds Special Area of Conservation (SAC); and
- Bredon Hill SAC.

The HRA Screening Report did not identify any potential significant effects arising from the DPD.

## 1.2 How to comment on this document

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

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

### 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 **13<sup>th</sup> December 2022** to:

South Worcestershire Development Plan Team

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

Email: [contact@swdevelopmentplan.org](mailto:contact@swdevelopmentplan.org)



## 2 Approach to the SA

### 2.1 SA process and requirements

SA is a staged process. The SA Report encompasses Stages B and C of the SA process and fulfils the requirements to:

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

The most important product of Stage A of the SA is the SA Framework (Table NTS.1), which contains a set of sustainability objectives against which the DPD and its alternatives have been tested. The objectives reflect the sustainability issues identified in Stage A.

**Table NTS.1: The SA Framework**

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

SA Objectives	Decision-Making Criteria
<b>SA5. To contribute towards improving the health and wellbeing of all</b>	Is there/will there be access to health care facilities by public transport or walking?
	Is there access to open space, biodiversity and recreational facilities by cycling, walking and public transport?
<b>SA6. To reduce the causes of climate change and adapt to its impacts</b>	Does the site provide access to a permanent power supply?
<b>SA7. To minimise waste and promote recycling, reuse and recovery</b>	Is the site in a location where existing kerb side recycling services can be extended, or big enough to provide onsite recycling facilities?
<b>SA8. To reduce the need to travel and promote sustainable travel options</b>	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).
<b>SA9. To improve, restore and recreate biodiversity and geodiversity</b>	Could the site have any adverse impact on sites designated under international, European, national or local designations?
	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).
	Is the site, or part of the site, previously developed land?
	Is the site greenfield?
<b>SA10. To protect and enhance landscape and townscape character and quality</b>	Could the site have any adverse impact on Registered Parks and Gardens, protected landscapes e.g. AONB?
	Is the site in the Green Belt?
<b>SA11. To protect and enhance the historic environment, historic character and quality of landscapes and townscapes</b>	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"> <li>- Conservation Areas</li> <li>- Listed buildings</li> <li>- Archaeological sites</li> <li>- Historic Parks and Gardens</li> <li>- Historic landscape</li> <li>- battlefields</li> </ul>
<b>SA12. To minimise pollution</b>	Could the proposed use of the site cause increased noise, light or air pollution conflicts for existing development?

SA Objectives	Decision-Making Criteria
<b>SA13. To manage water in a sustainable manner</b>	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?

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 NTS.2: Potential Significance Scores**

Score	Significant Score description
<b>++</b>	<b>Significantly Positive.</b> Development actively encouraged as it would resolve an existing sustainability problem
<b>+</b>	<b>Positive.</b> No sustainability constraints and development acceptable
<b>0</b>	<b>Neutral</b>
<b>?</b>	<b>Unknown/uncertain effect</b>
<b>-</b>	<b>Negative.</b> Potential sustainability issues; mitigation and/or negotiation possible
<b>--</b>	<b>Significantly Negative.</b> 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 relevant guidance<sup>3</sup>. 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 /

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<sup>3</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

temporary, direct, indirect and cumulative effects (see Appendices A and B of the main SA Report).

### **Assumptions and Limitations**

Regulations<sup>4</sup> 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.

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) within Policy T1 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>

## **3 The Content of the DPD**

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*

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<sup>4</sup> 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.

*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 South Worcestershire Council 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 DPD 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

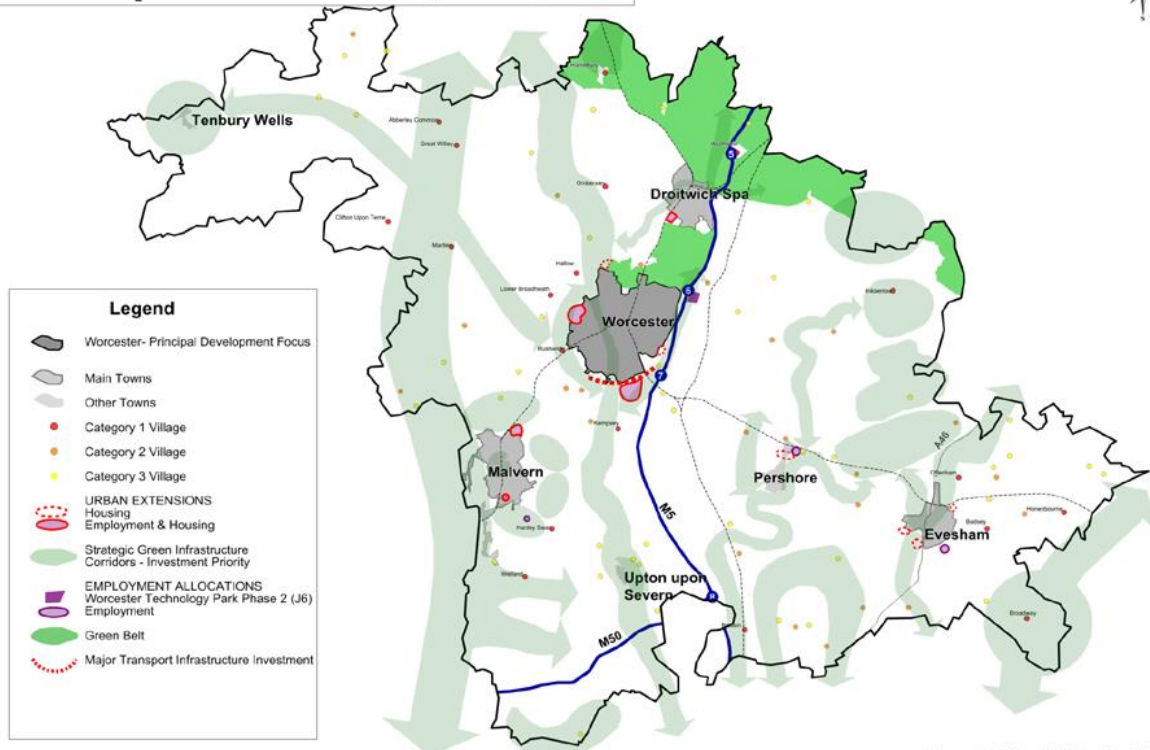
South Worcestershire covers approximately 1,300 square kilometres of the County and forms the southern limit of the West Midlands. The area is comprised of the largely rural districts of Malvern and Wychavon, with the City of Worcester forming the largest urban area. Three main towns, Droitwich Spa, 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 below illustrates the main features of the plan area including transport and infrastructure links.

**SOUTH WORCESTERSHIRE**  
**Development Plan - Key Diagram**



**Legend**

- Worcester- Principal Development Focus
- Main Towns
- Other Towns
- Category 1 Village
- Category 2 Village
- Category 3 Village
- URBAN EXTENSIONS Housing Employment & Housing
- Strategic Green Infrastructure Corridors - Investment Priority
- EMPLOYMENT ALLOCATIONS Worcester Technology Park Phase 2 (J6) Employment
- Green Belt
- Major Transport Infrastructure Investment

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## 4 Review of Other Programmes and Plans

A requirement of the SA process is the identification of other plans and policies that are relevant to the document that is under preparation and identification of the key messages or objectives of the other relevant plans and policies. Table NTS.3 presents the key messages identified in the review.

**Table NTS.3: 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"> <li>• 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;</li> <li>• Contribute to climate change by developing and promoting low-carbon travel choices;</li> <li>• Promotion of walking and cycling as healthy and more preferable options to car for local journeys;</li> <li>• Mitigate and minimise adverse impacts on health and quality of life;</li> <li>• Minimise pollution and other adverse effects on the local and natural environment;</li> <li>• Planning policies should limit the impact of light pollution from artificial light on local amenity and nature conservation; and</li> <li>• Support the aims and objectives of the Air Quality Management Plan for Worcestershire.</li> </ul>
Biodiversity & Green Infrastructure	<ul style="list-style-type: none"> <li>• Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks;</li> <li>• Provide accessible natural greenspace;</li> <li>• Minimise impacts on biodiversity and provide net gains in biodiversity in line with NPPF and the emerging Environment Bill;</li> <li>• Restore, recreate and reconnect wildlife habitats, landscapes and communities;</li> <li>• Support development design and restoration that incorporates and enhances our geodiversity;</li> <li>• To maintain and enhance our geodiversity through the management of sites, areas and wider landscapes;</li> <li>• Maximise the potential of Green Infrastructure and develop it for healthy communities and ecosystems;</li> <li>• Aim to prevent harm to geological conservation interests;</li> <li>• To maintain and enhance geodiversity through the management of sites, areas and wider landscapes;</li> <li>• To increase recognition of our geodiversity in international, national, regional and local environmental and planning development policies and legislation;</li> <li>• Support the aims of the Biodiversity Actions Plans; and</li> </ul>

SA Topic	Key Messages from Review
	<ul style="list-style-type: none"> <li>• Support the aims and objectives of the Worcestershire Green Infrastructure Strategy.</li> </ul>
Climate Change	<ul style="list-style-type: none"> <li>• Promote low carbon economies and adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050;</li> <li>• Increase resilience to climate change impact through the location, mix and design of development;</li> <li>• Plan for new development in locations and through orientation and design which reduce greenhouse gas emissions;</li> <li>• Adapt to climate change e.g., considering future climate change risks when allocating development sites;</li> <li>• Manage flood risks in an appropriate way taking account of the needs of the communities and the environment;</li> <li>• Avoid development in areas of flood risk;</li> <li>• Improve flood awareness and emergency planning;</li> <li>• Reducing the need to travel and providing sustainable transport to help mitigate climate change by reducing emissions;</li> <li>• Support energy efficiency and other sustainability improvements to existing buildings, particularly housing;</li> <li>• Recognise the embodied energy in existing buildings, avoid demolition and promote re-use of buildings;</li> <li>• Encourage the provision of renewable energy. Change to 'provide opportunities for renewable and low carbon energy technologies';</li> <li>• Increase energy efficiency and move towards a low carbon economy; and</li> <li>• Support the aims and objectives of each SWC's climate change action plans.</li> </ul>
Community Safety & Neighbourhood Quality	<ul style="list-style-type: none"> <li>• Planning policies should aim to achieve healthy, inclusive and safe places;</li> <li>• Local neighbourhoods are and should feel like, safe and interesting places to play; and</li> <li>• Reduce anti-social behaviour.</li> <li>• 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.</li> </ul>
Economy & Employment	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Create jobs and prosperity;</li> <li>• Support economic growth and productivity, having regard to local industrial strategies and other local policies for economic development and regeneration; and</li> </ul> <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>

SA Topic	Key Messages from Review
Health & Wellbeing	<ul style="list-style-type: none"> <li>• The Equality Act 2010 legally protects people from discrimination in the workplace and in the wider society;</li> <li>• Planning policies and decisions should aim to achieve healthy, inclusive and safe places;</li> <li>• Ensure a healthy standard of living for all;</li> <li>• Ensure equality and a prosperity for all; and</li> <li>• Help to achieve the aim and objectives of the respective SWC strategies and promises to deliver on health improvements and wellbeing.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Meet future housing need;</li> <li>• Ensure that housing growth requirements are accommodated in the most sustainable way;</li> <li>• Enable housing growth and deliver a mix of high-quality housing of varying size and tenure in order to meet local needs;</li> <li>• Make appropriate provision for gypsies, travellers and travelling show people;</li> <li>• Prevent homelessness:</li> <li>• 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.</li> </ul>
Landscape Character & Natural Resources	<ul style="list-style-type: none"> <li>• Protect and enhance valued landscapes, biological and geological conservation interests and soils;</li> <li>• Recognise the wider benefits from natural capital and ecosystem services;</li> <li>• Seek to promote or reinforce local distinctiveness;</li> <li>• Recover nature and enhance the beauty of landscapes; and</li> <li>• 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.</li> </ul>
Leisure & Recreation	<ul style="list-style-type: none"> <li>• Local neighbourhoods are, and feel like, safe, interesting places to play; and</li> <li>• 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.</li> </ul>
Population & Equality	<ul style="list-style-type: none"> <li>• The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society; and</li> <li>• Tackling rural social exclusion wherever it occurs and providing fair access to services and opportunities for all rural people.</li> <li>• Provide sites in locations via the development strategy that are accessible to a range of services and facilities.</li> </ul>
Townscape Quality, Historic & Cultural Heritage	<ul style="list-style-type: none"> <li>• 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;</li> <li>• Sustain and enhance the historic environment, heritage assets and their settings;</li> <li>• Sustain and enhance access to cultural heritage assets; and</li> </ul>

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

## 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 plan area and the trends that may continue without the preparation of the DPD.

The baseline data for the plan area is set out within Chapter 5 of the main SA Report. Table NTS.4 presents the key issues of relevance to the south Worcestershire districts and the DPD and the potential future baseline conditions without the DPD. The key issues have informed the SA Framework of objectives, as demonstrated within Table NTS.4.

**Table NTS.4: SA Framework, Key Baseline Data and Issues**

SA Objectives	Key Baseline Data and Issues	Future Baseline Conditions
<p><b>SA1. To develop a healthy, active and diverse economy</b></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><b>SA2. To maintain and improve communities to meet the needs of the population and promote social inclusion</b></p>	<p>In the 2011 Census, a total of 273 households in south Worcestershire were identified as having a 'White: Gypsy or Irish Traveller' (WGoIT) ethnicity.</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><b>SA3. To provide for adequate on-site services for water supply mains electricity, waste disposal and foul and surface water drainage</b></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 absence of planned allocations would limit Severn Trent Water ability to plan for future supply and provide the necessary infrastructure etc.</p>

SA Objectives	Key Baseline Data and Issues	Future Baseline Conditions
	<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>Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.</p>
<p><b>SA4. To promote quality design and sustainable construction for building and places</b></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><b>SA5. To contribute towards improving the health and wellbeing of all</b></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><b>SA6. To reduce the causes of climate change and adapt to its impacts</b></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</p>

SA Objectives	Key Baseline Data and Issues	Future Baseline Conditions
		renewable energy generation) or resilience to climate change on sites.
<b>SA7. To minimise waste and promote recycling, reuse and recovery</b>	Existing or unauthorised sites are likely to have the minimum waste collection and recycling collection provided by the local authority.	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.
<b>SA8. To reduce the need to travel and promote sustainable travel options</b>	<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>	Unauthorised or windfall sites may not have access to existing services and facilities in nearby villages and towns.
<b>SA9. To improve, restore and recreate biodiversity and geodiversity</b>	A high-quality environment with a number of important assets including the Malvern Hills AONB and Cotswolds AONB. Part of the Abberley and Malvern Hills Geopark lies within the area within Malvern Hills. The northern	Likely to remain broadly the same although without a Plan which allocates sufficient sites

SA Objectives	Key Baseline Data and Issues	Future Baseline Conditions
<p><b>SA10. To protect and enhance landscape and townscape character and quality</b></p>	<p>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.</p> <p>There are two SAC in south Worcestershire, Bredon Hill and Lyppard Grange Ponds, 165 SSSI, 468 Special Wildlife Sites and 118ha of Area of Special Wildlife Sites.</p> <p>There is a need to maintain and enhance the high quality natural environment and biodiversity of the plan area.</p>	<p>then sites could have an impact as need overrides environmental considerations.</p>
<p><b>SA11. To protect and enhance the historic environment, historic character and quality of landscapes and townscapes</b></p>	<p>The settlements of south Worcestershire include a range of heritage assets, designated and non-designated. The area includes 105 Conservation Areas, and 5,344 listed buildings, and assets on local lists. There are 163 Scheduled Monuments and 125 historic parks and gardens and 38 structures identified on the Historic England 2020 Buildings at Risk Register.</p> <p>There is a need to maintain and enhance the high quality built and historic environment of the plan area.</p>	<p>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.</p>
<p><b>SA12. To minimise pollution</b></p>	<p>There are potential adverse impacts from windfall or tolerated sites on air, water and soil quality.</p>	<p>Without the Plan there are no policies to help control or regulate these issues on new sites.</p>



SA Objectives	Key Baseline Data and Issues	Future Baseline Conditions
<p><b>SA13. To manage water in a sustainable manner</b></p>	<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>	<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.</p>

## Data Gaps

The baseline data was collected from a number of sources including Neighbourhood Statistics, district council records and survey work, and the 2019 WGTA. 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 to the DPD

A number of alternatives to the content of the DPD have been considered and assessed.

Alternatives for policy approaches have been assessed and these are discussed in Subsection 6.1.

21 reasonable alternative sites have been identified. 17 sites have been rejected and four selected. The assessment of the site options and the DPD policy approach options has been undertaken using the SA Framework.

### 6.1 Policy Approach Alternatives

Table NTS.5 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 NTS.5. A number of alternatives have been selected.

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 of this document. The findings of the assessments of the rejected alternatives can be found in Appendix A of the main SA Report.

**Table NTS.5: Justifications for Selection and Rejection of Policy Approach Options**

Policy Approaches	Reasons for Selecting or Rejecting Options
<b>Travelling Showpeople</b>	
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. 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.
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.
<b>Transit Sites</b>	
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.

Policy Approaches	Reasons for Selecting or Rejecting Options
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.
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 DPD.
<b>Meeting the Need for Developable Pitches and Plots in years six to ten</b>	
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.
Option 2: Windfall development proposals to be assessed in accordance with the planning criteria in the Site Allocations DPD, including within 800m of a town or Category 1, 2 or 3 settlement	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 Category 1, 2 or 3 settlement may be too prescriptive.

<b>Policy Approaches</b>	<b>Reasons for Selecting or Rejecting Options</b>
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)	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.
Option 4: Extra pitches allocated in the DPD.	Select –The DPD allocates new pitches on existing sites with reasonable access to local services.
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>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.</p>
<b>Other Planning Matters</b> <b>Tenure of new Pitches and Plots</b>	
Option 1: Rely on a sufficient supply of private pitches coming forward through the Development Management process.	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 social-rented pitches.

Policy Approaches	Reasons for Selecting or Rejecting Options
<p>Option 2: Plan for socially-rented pitches / plots on sites allocated in the urban extensions and/or new settlements.</p>	<p>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.</p>
<p><b>Nomadic Habit of Life</b></p>	
<p>Option 1: Seek to meet the need for pitches based on the Government's definition of Travellers in Planning Policy for Traveller Sites</p>	<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.</p>
<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)</p>	<p>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.</p>

Policy Approaches	Reasons for Selecting or Rejecting Options
<b>Rural Exception Sites</b>	
<p>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.</p>	<p>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.</p>
<p>Option 2: Do not include a specific policy for rural exception Traveller sites within the DPD</p>	<p>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 DPD.</p>
<b>Safeguarding of Sites</b>	
<p>Option 1: Safeguard sites with planning permission (where there is no personal occupancy restriction) in perpetuity for Traveller and Travelling Showpeople accommodation use.</p>	<p>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.</p>
<p>Option 2: Do not safeguard existing sites for Traveller and Travelling Showpeople accommodation use.</p>	<p>Reject – To ensure that Traveller and Travelling Showpeople site provision is not lost to other forms of development.</p>

## 6.2 Site Allocation Alternatives

The main objective of appraising site options 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.

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 process followed for selecting site allocations is described in detail within Chapter 6 of the main SA Report which draws information from the TTSPS DPD Further Revised Site Assessment Background Report (September 2022).

Potential site options were sieved out immediately if they were likely to fail on the grounds of either the site being unavailable for Traveller or Travelling Showpeople purposes or likely to contravene 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 (November 2021). 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 and were subject to 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.

The selected allocation sites are listed in Table NTS.7. The key to the symbols within the table can be found within Table NTS.2 on page 11. The alternative sites which were not selected are listed in Table NTS.6 along with an indication of their sustainability performance.



**Table NTS.6: Summary Sustainability Performance of Rejected Reasonable Site Alternatives**

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

**Table NTS.7: 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
<b>South Worcs Total</b>			<b>6</b>	<b>Traveller</b>

\* 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 two Traveller sites and also the proposed Strategic Allocations at Rushwick and Throckmorton Airfield shall both include one Traveller site. Each site is to have 10 pitches<sup>5</sup> and to be sited within the allocation boundaries in the locations<sup>6</sup> as defined in the masterplans for each new settlement.

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<sup>5</sup> The new Traveller site at Rushwick Expanded Settlement can be for either Travelling Showpeople or Travellers.

<sup>6</sup> 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 Predicted Sustainability Effects of the DPD

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 ; and
- 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.

Appendix B of the main SA Report presents the detailed assessments of the policies, including the potential nature of effects.

Tables NTS.8 and NTS.9 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 NTS. 8: 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 NTS.9: 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

## 7.1 Potential Cumulative Effects

Potential cumulative effects have been identified whilst undertaking the assessments of the DPD policies:

### **Communities, population and social inclusion (SA2)**

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.

### **Climate change, design and sustainable construction (SA4 and SA6)**

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).

### **Sustainable travel (SA8)**

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.

Table NTS.10 below outlines 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.

**Table NTS.10: 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"> <li>Improved housing provision for all, including affordable housing, housing for elderly people and sites for Travellers and Travelling Showpeople.</li> </ul>	<ul style="list-style-type: none"> <li>Increased pressures on open/green space and biodiversity assets from recreation, disturbance and direct development.</li> <li>Overall growth in greenhouse gas emissions from a growth in traffic/transport and emissions from the built environment.</li> <li>Increase overall in coverage of impermeable services, with potential contributions to flood risk in the long term.</li> </ul>
Community Strategies (Sustainable Community strategy for Worcestershire, 2011-2021)	<ul style="list-style-type: none"> <li>Improved delivery of neighbourhood level community services and facilities.</li> <li>Cumulative benefits for health, wellbeing and equality aims, through improvements to access/provision of facilities including for sport and recreation.</li> <li>Enhanced community cohesion through both locations of sites in the DPD and the provision of services for all.</li> </ul>	None identified.
South Worcestershire Development Plan, 2016	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Increased loss of greenfield land resulting from the development of sites for residential and employment use, including DPD sites.</li> </ul>



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

Mitigation to reduce or offset a potential negative or uncertain effect and enhancement measures to improve sustainability performance have been put forward through the SA:

### **Climate change (SA6)**

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.

### **Design and sustainable construction (SA4)**

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.

### **Biodiversity and geodiversity (SA9)**

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.

### **Landscape and townscape character and quality (SA10)**

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.

### **Historic environment, character and quality of landscapes and townscapes (SA11)**

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.

## **9 Proposed Monitoring Arrangements**

SA monitoring should cover the significant economic, environmental and social effects identified in the assessment of the plan.

Table NTS.11 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 SWDP (2016).

The policies and objectives of the DPD will be delivered in the context of the SWDP 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 NTS.11: 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"> <li>• Planning applications objected to by Natural England on the grounds of local biodiversity degradation</li> <li>• Hectares of greenfield land developed.</li> </ul>
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"> <li>• Local air quality indicators</li> <li>• Public transport utilisation data.</li> </ul>
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"> <li>• Completion of the BNG Metric to the satisfaction of the planning authority.</li> </ul>
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"> <li>• Discharge of planning obligations.</li> </ul>
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"> <li>• Discharge of planning obligations.</li> </ul>



## 10 Next Steps

The SA Report (and this summary) is being published for consultation alongside the Regulation 19 version of the DPD.

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

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