

**South Worcestershire
Travellers and Travelling Showpeople**

**Site Allocations
Development Plan Document**

**Revised Preferred Options
Consultation**

February 2018

Contents

	Page
1. Introduction and Context	
Purpose of the Consultation	5
Purpose of the Travellers and Travelling Showpeople Site Allocations Development Plan Document	5
Sustainability Appraisal	6
How to Comment	6
Definition of Travellers and Travelling Showpeople	7
National Planning Policy Context	7
Local Plan Context	8
Policy SWDP 17 and Related Policies	8
Existing Provision of Traveller Pitches and Showpeople Plots in South Worcestershire	10
Why We Need A Traveller and Travelling Showpeople Site Allocations Development Plan Document	10
2. What We Have Done So Far	
Vision	12
Objectives	12
The Evidence Base	13
Development to Date	15
Tolerated Sites	16
Call for Sites – Spring 2015	16
Preferred Options Consultation – Spring 2016	17
Call for Sites – Winter 2016/17	17
Site Selection Process	18
3. Proposed Site Allocations	
Meeting The Need For Deliverable Traveller Pitches To 2021/22	20
Specific Consultation Questions	

Travelling Showpeople	22
Transit Sites	22
Proposed Deliverable Pitches	22
Meeting The Need For Developable Pitches and Plots	23
Figure 1: Broad Locations for the Growth of Sites for Travellers and Travelling Showpeople	24
4. Other Planning Issues	
Tenure Of Proposed New Pitches	25
Nomadic Habit Of Life	25
Rural Exception Sites	26
Site Design Considerations	26
Safeguarding Of Sites	28
General	28
5. Next Steps	
Timetable	29
Appendix 1 Glossary	30
Appendix 2 Site Assessment Criteria and Detailed Considerations	33
Appendix 3 Proposed Site Allocations	35
Figure 2: Location of Proposed Deliverable & Developable Sites	35
Hillbee Farm, Welland Road, Upton upon Severn	36
The Orchard, Knowle Hill, Evesham	37
Shorthill Caravan Park, Crossway Green	38
Mountain View, Bastonford	39
Willows End, Guarlford	40
Main Road, Kempsey¹	

¹ This site is no longer included in the Revised Preferred Options because the landowner confirmed on 30 Jan 2018 that it is not available for Gypsy and Traveller use but instead want it considered for Travelling Showpeople use. The Council has not yet had the opportunity to assess the site for Travelling Showpeople use and therefore the site does not form part of the Revised Preferred Options consultation.

Blossom Hill, Village St, Aldington	41
Hughes Barn, Bretforton Rd, Badsey	42

1. Introduction and Context

Purpose of the Consultation

The South Worcestershire Councils (Malvern Hills, Worcester and Wychavon) are preparing a Travellers and Travelling Showpeople Site Allocations Development Plan Document which will set out the requirement for the number of pitches and plots to be provided to meet the needs of Travellers and Travelling Showpeople in south Worcestershire over the coming years.

The final Development Plan Document (DPD) will allocate new sites or extensions/intensifications to existing Travellers and Travelling Showpeople sites and will become part of the Development Plan for the South Worcestershire Councils (SWCs).

In March / April 2016 a Preferred Options Consultation was carried out following an initial call for sites in February / March 2015, but due to issues raised in the representations received some sites were deleted and so a second call for sites was required (between November 2016 and January 2017). The current Revised Preferred Options Consultation Document includes sites from both calls for sites and outlines the SWC preferred options for delivering the Travellers and Travelling Showpeople accommodation requirements set out in SWDP17. Sites were sieved out which failed on the grounds of either the site being unavailable for Travellers or Travelling Showpeople purposes or the site had major constraints such as being within planning designations, areas prone to flooding, or on contaminated land, etc. Remaining sites went through a more detailed assessment. This is explained further in the section on Site Selection Process (page 17).

Purpose of the Travellers and Travelling Showpeople Site Allocations Development Plan Document

The Travellers and Travelling Showpeople Site Allocations Development Plan Document (TTS DPD) allocates sites to meet the need as identified in the Gypsy and Traveller Accommodation Assessment (GTAA) and presented in policy SWDP17:

- The short term needs (for the first 5 years) will be met through the allocation of sites to meet the identified needs in the GTAA – this includes the allocation of existing tolerated sites, i.e. sites which do not have planning permission but do not cause any planning harm.
- The medium term need (for years 6 to 10) will be met via the new sites on the urban extensions and/or windfall sites coming forward in the broad locations indicated on Map 1.
- The longer term need (11 to 15 years) is not covered by this DPD because the level of need is likely to have changed by that time and there will have been a review of the South Worcestershire Development Plan (SWDP).

The TTS DPD also clarifies and strengthens the planning emphasis to be given to the criteria given in policy SWDP17C.

The Revised Preferred Options consultation seeks views on these matters.

Sustainability Appraisal

The TTS DPD is informed by a Sustainability Appraisal (SA) which will contribute to the evidence base with the aim of delivering sustainable development.

For the purposes of this consultation an Interim Sustainability Appraisal has been prepared to set out the assessment of the strategic options and sites and can be viewed at http://www.swdevelopmentplan.org/?page_id=13633. A full Sustainability Appraisal Report will be published alongside the Publication version of the Plan.

How to Comment

The consultation period runs for 7 weeks from 28 February to 18 April 2018 and comments can be made using the on-line form via the SWDP website http://www.swdevelopmentplan.org/?page_id=13633:

Alternatively you may wish to submit comments:

- By email. To: contact@swdevelopmentplan.org or
- By post. To: South Worcestershire Development Plan, c/o Wychavon District Council, Civic Centre, Queen Elizabeth Drive, Pershore, Worcestershire, WR10 1PT.

Further information about the TTS DPD and an electronic copy of the Response Form are available on the SWDP website at http://www.swdevelopmentplan.org/?page_id=13633

Hard copies of this Consultation Document are also available at Council Customer Service Centres and/or Libraries.

Please be aware that copies of representations will be made available for public inspection and cannot be treated as confidential. This information will include your name, organisation and your comment. Representations will also be available on the councils' websites.

Inappropriate comments submitted as part of the consultation will not be considered. These may include, but are not be limited to, representations that are deemed to be racist or discriminatory.

Definition of Travellers and Travelling Showpeople

For the purposes of planning, The Government's **Planning Policy for Traveller Sites** (August 2015) defines Gypsies and Travellers as:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such.

Planning Policy for Traveller Sites also says that "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:

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

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 family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

The National Planning Policy Context

The Government's Planning Policy for Traveller Sites (paragraph 10) 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.*"

The 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.

The Government's 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.” (paragraph 11)

Local Plan Context

The SWC prepared the SWDP which was adopted in February 2016. The SWDP sets out the strategy, together with policies and site allocations to guide the location of new pitches in south Worcestershire up to 2030.

One of the issues that the SWDP addresses is meeting the accommodation needs of Travellers and Travelling Showpeople.

The planning status of the TTS DPD equals the SWDP and uses the same evidence that informed the SWDP. The TTS DPD will allocate sites to meet the outstanding need for the number of pitches as identified in the Gypsy and Traveller Accommodation Assessment (GTAA) and presented in policy SWDP17. It is not necessary to update the GTAA because:

the TTS DPD is a subsidiary document to the SWDP;

the DPD is implementing SWDP17, which was only adopted in February 2016;

the DPD is not revisiting the GTAA need figures; and

by constantly reviewing the GTAA, it will be impossible to identify sites and progress to meeting the need on the ground.

Policy SWDP 17 (Travellers and Travelling Showpeople) and Related South Worcestershire Development Plan Policies

Policy SWDP 17 in the SWDP sets out the future pitch requirements for Travellers and plot requirements for Travelling Showpeople based on the Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) - see section on Evidence Base below. SWDP 17 says that the SWC will identify additional sites in the TTS DPD to help meet these needs.

Policy SWDP17 also sets out a number of criteria to guide land supply allocations and provide a basis for decisions when planning applications come forward. The wording of criterion xi of SWDP17 has been amended below to reflect the cancellation of the CLG Good Practice Guide on Designing Gypsy and Traveller Sites and the inclusion of good design parameters within this DPD in its place. In addition, this DPD for Travellers will strengthen these criteria by requiring planning applications for Traveller pitches and Travelling Showpeople plots to satisfy the following criteria i to x :

- i. *For new sites only- the site is within 800m of a development boundary of a town or Category 1, 2 or 3² settlement.*
- ii. *The site is not within an international or national³ planning designation, such as Areas of Outstanding Natural Beauty and Scheduled Monuments*

² Definition of Category 1, 2 and 3 settlement – see Glossary. To clarify the 800m is calculated by travel distance – i.e. along the road network and is not a radius measurement from the site.

- iii. *The site is within Flood Zone 1 and is not vulnerable to surface water flooding that cannot be adequately overcome by mitigation measures.*
- iv. *The site does not have any significant impact on local plan designations such as Conservation Areas or Significant Gaps, and is not on a site of ecological or biodiversity interests that cannot be mitigated.*
- v. *There is no significant visual impact on the landscape that cannot be adequately overcome by mitigation measures.*
- vi. *There is no significant impact on privacy and residential amenity for both site residents and neighbouring properties that cannot be adequately overcome by mitigation measures.*
- vii. *The size of the site and the number of pitches is of an appropriate scale for the location.*
- viii. *The site has safe and convenient access to the highway network.*
- ix. *The site is capable of providing adequate on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.*
- x. *The site accords with the good design parameters set out in this DPD*

In addition to the above essential criteria the site will also be assessed to see if it has reasonable access to health services, schools and employment.

³ Examples of international designations include Special Protection Areas, Special Areas of Conservation and Ramsar sites. Examples of national designations include Areas of Outstanding Natural Beauty, Green Belts, Sites of Special Scientific Interest and National Nature Reserves.

Existing Provision of Travellers Pitches and Showpeople Plots in South Worcestershire

In south Worcestershire, as at 31 March 2017, there were 276 pitches on local authority owned sites, 162 pitches on private permanent authorised sites, 18 pitches on private temporary authorised sites, and 7 pitches on unauthorised sites, 6 of which were tolerated. This is summarised in Table 1.

Table 1

Traveller Pitches in South Worcestershire (as at 31 March 2017)

	Malvern Hills	Worcester	Wychavon	Total
Local Authority Site*	5	18	66	89
Housing Association Site	0	0	0	0
Private Site – Authorised	15	0	147	162
Private Site – Temporary Authorised*	8	0	10	18
Unauthorised	0	0	1	1
Unauthorised - tolerated	0	0	6	6
TOTAL	28	18	230	276

*Excludes Cleeve Prior Local Authority site

**Plus an additional 24 transit pitches at Crossway Green

In terms of yard provision for Travelling Showpeople, there were 17 plots on a private authorised yard in Malvern Hills District.

Why Do We Need A Traveller and Travelling Showpeople Site Allocations Development Plan Document?

The SWC are required to identify and update annually, a supply of deliverable Travellers pitches sufficient to provide five years' worth of sites against locally set targets. It is important to be able to demonstrate a 5 year supply of sites and the adoption of a DPD is the best way to evidence a suitable supply of sites and thus reduce the risk of less appropriate sites being approved, or granted temporary consent.

Further, the failure to allocate sufficient land to meet the need for new pitches could have a number of impacts including:

- Continuing the problem of unauthorised development and encampments with the associated tensions with the settled community,
- Restricting the Council's ability to enforce against unauthorised development as our ability to enforce is related to efforts to meet the need for new provision, and
- Increasing the difficulty of ensuring that the Traveller and Travelling Showpeople community has access to the same public services that are available to the settled community.

The TTS DPD will therefore seek to address these issues by identifying deliverable sites to meet the accommodation needs of Travellers and Travelling Showpeople in south Worcestershire in the 5 years from 2018/19 to 2022/23 and identify broad locations for years 6 to 10.

Doing nothing to address the issues is therefore not considered a viable option.

2. What Have We Done So Far?

Vision

The Vision for the TTS 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 settled communities have security and certainty about their future and that of their local environment.

Objectives

The overarching objective to deliver this Vision is to:

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 that meet their needs, whilst respecting the interests of the settled community.

To achieve this it will be necessary to:

- Identify sites that are available, suitable and deliverable;
- Allocate and grant planning permission for sufficient land and pitches to meet identified needs within south Worcestershire in the most appropriate locations;
- Allocate sites and pitches in the most sustainable locations to enable reasonable access to local services and facilities including health, education and employment;
- Ensure sites are of high quality design and are safe and pleasant places to live; and
- Provide clear guidance for making decisions on planning applications regarding Traveller and Travelling Showpeople sites.

The Evidence Base

In November 2014 the six Worcestershire local planning authorities published the Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA) which identifies the future accommodation needs of Gypsies and Travellers and Travelling Showpeople across the county. The Worcestershire GTAA is available at

<http://www.swdevelopmentplan.org/wp-content/uploads/2014/12/WorcestershireGTAAMainReportNov2014.pdf>

The GTAA included interviews with 297 Traveller and Travelling Showpeople households living in south Worcestershire.

The GTAA assessment of pitch and plot requirements was calculated based on the results of the survey interviews and information on the current supply of pitches / plots.

As part of the process of testing the soundness of the SWDP Examination Hearings on the Traveller and Travelling Showpeople policy (SWDP 17) were held in April 2015. The Hearings included a thorough examination of the GTAA. The assessment of need for permanent Traveller pitches in south Worcestershire was revised to reflect the Inspector's interim findings following the Examination Hearings into the SWDP.

In October 2016 the SWC published a South Worcestershire Addendum to the GTAA which verified the supply of pitches and updated the pitch turnover rate in light of relevant evidence. The South Worcestershire Addendum to the GTAA is available at

<http://www.swdevelopmentplan.org/wp-content/uploads/2016/11/South-Worc-GTAA-Addendum-Oct-2016.pdf>

The South Worcestershire Addendum to the GTAA identified a need for 34 permanent Traveller pitches across south Worcestershire in the period 2014/15 to 2018/19 – see Table 2. The identified need was primarily in Wychavon where there was a requirement for 33 pitches. There was a requirement for 6 pitches in Malvern Hills and a potential over supply of 5 pitches in Worcester up to 2018/19.

For Travelling Showpeople, the GTAA identified no overall additional need for plots across south Worcestershire in the period 2014/15 to 2018/19.

The GTAA also recommended that provision be made for a minimum of 5 transit pitches to cover the period 2014/15 to 2018/19 and suggested that the SWC cooperate with a view to providing a shared transit site.

There are currently 7 council managed sites in south Worcestershire which provide 89 pitches. The GTAA indicated a desire amongst Travellers for a mixture of private and council / Registered Social Landlord managed sites.

Table 2

Need for Permanent Traveller Pitches, Travelling Showpeople Plots and Transit Pitches - 2014/15 – 2018/19

	Permanent Traveller Pitches	Permanent Travelling Showpeople Plots	Transit Pitches
Malvern Hills	6	0	3
Worcester	-5	0	0
Wychavon	33	0	2
Total	34	0	5

source: South Worcestershire Addendum to the GTAA, October 2016

The GTAA also identified the likely longer-term requirement for pitches and plots, covering the period 2019/20 to 2033/34. The longer-term requirements, based on expected household formation rates, are set out in Table 3. The longer-term requirements make no allowance for turnover on existing sites or whether Travellers intend to live a nomadic habit of life in the future. The longer-term requirements are therefore indicative and liable to change in light of future updated turnover rates and other evidence of need.

Table 3

Longer-Term Requirement for Permanent Travellers Pitches and Travelling Showpeople Plots - 2019/20 – 2033/34

	2019/20 – 2023/24		2024/25 – 2028/29	
	Traveller Pitches	Showpeople Plots	Traveller Pitches	Showpeople Plots
Malvern Hills	6	2	6	2
Worcester	5	0	3	0
Wychavon	19	0	23	0
Total	30	2	32	2

Source: Worcestershire Gypsy & Traveller Accommodation Assessment, November 2014

The GTAA suggests a need across south Worcestershire for up to 30 Traveller pitches between 2019/20 and 2023/24, 32 pitches between 2024/25 to 2028/29, and 46 pitches between 2029/30 to 2033/34 – with most of the need arising in Wychavon.

For Travelling Showpeople, the GTAA indicates a need for an additional 2 plots in Malvern Hills between 2019/20 and 2023/24, and a further 6 plots in the period 2024/25 to 2033/34.

Development to Date

The SWC will update annually the supply of deliverable sites, with a rolling five-year cumulative requirement for pitches, set against a rolling five-year delivery of pitches.

When planning permissions are granted for permanent pitches through the development management process they will contribute towards the required 5-year land supply.

In 2014/15 4 pitches were granted planning consent in Wychavon, thus reducing the 5-year requirement for the period 2014/15 to 2018/19 from 34 pitches to 30 pitches - as shown in Table 4. In 2015/16 a further 18 pitches were granted consent in Wychavon. In 2016/17 7 more permanent pitches were granted across Malvern Hills, Worcester and Wychavon Districts.

Three pitches have been lost this year in Worcester due to the merging of 6 pitches into 3 at Waterside Park, the County Council run site. Once any planning consents granted in 2017/18 are taken into account the number of pitches can be calculated for the 5-year period 2018/19 to 2022/23. If there are no further consents for Traveller pitches in 2017/18 then the rolling 5-year requirement for Traveller pitches in 2018/19 (when the Site Allocations DPD is likely to be adopted) will increase by +6 to 32 pitches (21 in Wychavon, 10 in Malvern Hills and 1 in Worcester). – see Table 4.

Table 4

Rolling Five-Year Requirement for Traveller Pitches in South Worcestershire to 2022/23 (as at 1st April 2017)

1. Year	2. Pitch Requirement	3. Cumulative Requirement for Permanent Traveller Pitches	4. Net Additional Pitches Granted Consent During The Year	5. Cumulative Consents for Permanent Traveller Pitches	6. Cumulative Five Year Requirement (column 3 – column 5)
2014/15	GTAA Addendum (2016) 34 pitches 2014/15 – 2018/19 6.8 pitches p.a.	34	4	4	30
2015/16		40	18	22	18
2016/17		46	7	29	17
2017/18		52	-3 ⁴	26	26
2018/19		(58)	(0)	(26)	(32)

⁴ The net loss of 3 pitches arises from 6 pitches being merged into 3 at Waterside, Worcester during April 2017 and is shown in the table to ensure that the number of pitches across south Worcestershire are not over-inflated.

2019/20	GTAA (2014)				
2020/21	30 pitches*				
2021/22	2019/20 – 2023/23				
2022/23	6 pitches p.a.				
2023/24					

* The longer-term pitch requirements make no allowance for turnover on existing sites and are therefore indicative and liable to change in light of future updated turnover rates.

In addition, since 2014/15 temporary planning consent has been granted for a further 18 (8 in Malvern Hills and 10 in Wychavon) residential Traveller pitches and 24 transit pitches. As these residential and transit pitches have temporary rather than permanent consent, they cannot count towards the councils' five-year supply of pitches.

Tolerated Sites

It is suggested that the existing tolerated sites are allocated in the TTS DPD notwithstanding that they do not have planning permission as they have been in existence for many years and are not considered to cause any planning harm. The tolerated sites are all in Wychavon and are:

- The Gravel, Lineholt: 2 pitches,
- The Orchards, Knowle hill, Evesham: 2 pitches, and
- Sands Lane, Badsey: 2 pitches.

The inclusion of these tolerated sites will in effect increase supply by 6 pitches but without actually physically increasing the number of pitches on any of the sites. This would reduce the requirement from 32 pitches to 26 pitches for the first 5 year period from 1st April 2018/19 up to March 31st 2022/23.

Spring 2015 Call for Sites

In February / March 2015, the SWC conducted a 'call for sites' which provided an opportunity for individuals, organisations and other stakeholders to submit sites that they considered might be suitable for Travellers or Travelling Showpeople use. A Press Notice was also issued. Proposals were invited for either new sites or an expansion or intensification of existing sites. Proposals were also invited for permanent residential sites or transit sites / temporary stopping places.

17 sites were submitted during the call for sites including requests from the owners of some existing authorised sites to intensify (increase the number of pitches on the existing site) or extend their sites. The full list of sites submitted to the councils is available in a separate Site Allocations Background Report available on the SWDP website at [\(new link\)](#)

It was made clear that any sites submitted in the call for sites exercise, together with those proposed for the urban extensions, would be assessed for their suitability against the criteria

in SWDP17 and other good practice guidance, and then subject to public consultation, in order to determine which sites may be identified for allocation in this DPD.

The SWC also considered the potential suitability of Traveller sites with temporary planning permission which did not have a personal occupancy restriction.

Preferred Options Consultation – Spring 2016

In March / April 2016 the SWC consulted on Preferred Options for how the future accommodation needs of Travellers and Travelling Showpeople can be met. The consultation document identified nine potential sites where it was considered that new or additional Traveller pitches could be allocated. The document also outlined more detailed planning issues that would need to be considered when dealing with Traveller and Travelling Showpeople related development.

In light of responses received to the consultation:

- It is proposed that one of the sites included in the Preferred Options (at Cropthorne) is now deleted from the DPD,
- The number of additional pitches proposed on two sites (at Upton upon Severn and Evesham) are reduced,
- The extra pitches originally suggested for the site at Bredon have been deleted because the site is within a Local Gap as defined in policy NP2 of the adopted Bredon Parish Neighbourhood Plan (July 2017) and intensification of this site would conflict with this policy,
- Planning permission has subsequently been granted for the two pitches originally proposed at Aldington and for three pitches at 8 Evergreen, Cropthorne, so these are also no longer proposed allocations,
- Two further pitches were submitted in the second call for sites on adjoining land at Aldington and these are now proposed allocations.

Comments on the Preferred Options consultation have also helped to shape the SWC response on other planning issues in relation to Travellers and Travelling Showpeople related development. These are outlined in Chapter 4 of this document.

Call for Sites – Winter 2016/17

Following deliberation over the responses to the Preferred Options consultation the SWC considered that additional Traveller pitches may be required to provide five years' worth of sites against the locally set targets.

Between November 2016 and January 2017 the SWC therefore conducted a second call for sites which provided an opportunity for individuals and organisations to suggest any further sites that they considered might be suitable for allocation as a Travellers or Travelling Showpeople site.

A total of 21 sites were submitted during the second call for sites including requests from the owners of some existing authorised sites to intensify or extend their sites. One site was

submitted twice by different interested parties, so 20 separate sites were submitted in the second call for sites. The full list of sites submitted to the councils is available in the Site Allocations Background Report available on the SWDP website at http://www.swdevelopmentplan.org/?page_id=13633

The SWC have not discounted the possibility of other sites coming forward during the preparation of this DPD or through approvals of planning applications.

Site Selection Process

The SWC have used a staged approach to producing this Site Allocations DPD.

The first stage was to contact landowners, through the call for sites, who may have land that they wish to be considered for potential use by Travellers or Travelling Showpeople. These included owners of existing authorised sites, sites with temporary planning permission, tolerated sites, unauthorised developments, caravan parks, public sector land, and land submitted for consideration as potential housing allocations during the preparation of the SWDP.

The second stage involved a desk-based assessment of the submitted sites against the planning criteria set out in Appendix 2, together with an initial investigation of the likely availability. This stage sieved out immediately sites which failed on the grounds of either the site being unavailable for Travellers or Travelling Showpeople purposes or sites with major constraints such as being within planning designations, areas prone to flooding, or on contaminated land, etc. Sites which did not satisfy all of the essential criteria were rejected.

All of the remaining sites then went forward to stage three – a detailed on-site assessment. The on-site assessment helped determine whether:

- The land is relatively flat and stable.
- The site has (or has potential of) safe and convenient access to the highway network.
- There is likely to be any significant adverse visual impact which can not be adequately mitigated.
- There is likely to be a significant adverse impact on privacy and residential amenity for either site residents or neighbouring property that can not be mitigated.
- 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.

In addition to the essential criteria, sites were also assessed against the following 'desirable' criteria. Whilst a failure to meet the one or more of 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 accessible by walking, cycling and public transport.
- Whether it would be an extension to an existing site or a new site.

- Whether the site would be on previously developed land.

The Site Assessment Criteria and detailed considerations are summarised in Appendix 2.

3. Proposed Site Allocations

Following the detailed assessment of the 37 sites submitted in the call for sites, temporary Traveller sites without personal occupancy restrictions and sites submitted on (or in lieu of sites on) the proposed urban extensions, 8 sites meet, or have the potential to meet, the essential site suitability criteria and are proposed as potentially deliverable sites.

A copy of the Site Assessment Background Report is available on the SWDP website at http://www.swdevelopmentplan.org/?page_id=13633

The 8 potentially suitable deliverable sites and the 2 potentially developable sites and the broad locations for growth (for years 6 to 10) were considered by the three SWC in January/February 2018.

Meeting The Need For Deliverable Traveller Pitches To 2022/23

To meet the need for 26 deliverable permanent residential Traveller pitches in the first 5 year period to 2022/23 the SWC propose that new or additional pitches be allocated at the 8 sites listed in Tables 5 and 6 below.

Seven sites were consulted upon through the Preferred Options consultation in March/April 2016. Comments received have been reviewed and the number of sites subsequently reduced from 7 to 3 – the remaining 3 are listed below in Table 5. **It is not necessary to resubmit previous comments on these sites but if you did not make comments previously or you wish to submit new points then you can do so.**

Further information is provided on each of the 8 sites in Appendix 3.

Table 5

Proposed New or Additional Deliverable Pitches Consulted on in March / April 2016

Site Name and Location	District	New site or Extension to or intensification of Existing Site	Proposed Number of Additional Permanent Pitches
Hillbee Farm, Welland Road, Upton upon Severn	Malvern Hills	Existing: Intensification	3
The Orchard, Knowle Hill, Evesham	Wychavon	Existing: Extension	5
Shorthill Caravan Park, Crossway Green	Wychavon	New (currently has temporary planning permission)	10
Total			18

The 4 sites listed within Table 6 are new proposals. Comments on the suitability of the 4 new proposed potentially deliverable sites are being sought as part of this Revised Preferred Options consultation.

Table 6

Proposed New or Additional Deliverable Pitches

Site Name and Location	District	New site or Extension to or Intensification of Existing Site	Proposed Number of Additional Permanent Pitches
Mountain View, Bastonford	Malvern Hills	Existing Temporary	2
Willows End, Guarlford	Malvern Hills	Existing: Intensification	2
Main Road, Kempsey⁵	Malvern Hills	New	6
Blossom Hill, Village St, Aldington	Wychavon	Existing: Extension	2
Hughes Barn, Bretforton Rd, Badsey	Wychavon	New	6
Total			12

The SWC will update annually the supply of deliverable sites, with a rolling five-year cumulative requirement for pitches, set against a rolling five-year delivery of pitches. When planning permissions are granted through the development management process, these will contribute towards meeting the required 5-year land supply.

⁵ This site is no longer included in the Revised Preferred Options because the landowner confirmed on 30 Jan 2018 that it is not available for Gypsy and Traveller use but instead want it considered for Travelling Showpeople use. The Council has not yet had the opportunity to assess the site for Travelling Showpeople use and therefore the site does not form part of the Revised Preferred Options consultation.

Specific Consultation Questions

Travelling Showpeople

In the 2016 Preferred Options consultation respondents considered that since the GTAA did not identify a specific need for Travelling Showpeople plots in the next five years, the SWC need not allocate additional plots for Travelling Showpeople in the Site Allocations DPD. However, the GTAA identifies that 2 plots are required for the period from 2018/19 to 2022/23 – hence the need to now find sites for 2 plots.

Question 1 There have not been any suggested sites for Travelling Showpeople plots and therefore it is proposed that the SWC work with the Showman's Guild to identify a suitable site. Do you agree with this approach?

If no, please give your reasons.

Transit Sites

In the 2016 Preferred Options consultation respondents considered that some of the transit pitches granted temporary planning permission in 2015 could meet the need for transit pitches identified in the GTAA and considered that there is not a need to allocate additional transit pitches in the Site Allocations DPD.

Question 2 In July 2015 temporary planning permission was granted for 24 transit pitches in south Worcestershire to 2020 at Shorthill Caravan site, Crossway Green. The SWC suggest that only 5 of these 24 transit pitches are allocated in the DPD as transit pitches because it is considered that 24 transit pitches in one location is too many and likely to give rise to nuisance and disturbance to neighbouring businesses and residents both on the adjoining Gypsy site and in the settled community. The other 19 transit pitches allowed on appeal would be removed from the site. Do you agree with this approach?

If no, please give your reasons.

Proposed Deliverable Traveller Pitches

Question 3 Do you have any comments on the suitability of increasing the number of pitches (by 3 pitches) at the existing Traveller site at Hillbee Farm in Upton upon Severn?

Question 4 Do you have any comments on the suitability of increasing the number of pitches at the existing Traveller site by 5 pitches and allocating the 2 existing tolerated pitches at The Orchard, Knowle Hill in Evesham?

Question 5 Do you have any comments on the suitability of Shorthill Caravan Park in Crossway Green as a potential new permanent Traveller site for 10 pitches as well as the 5 transit pitches referred to in question 2 above?

Question 6 Do you have any comments on the suitability of Mountain View in Bastonford as a potential new permanent Traveller site for 2 pitches?

- Question 7 Do you have any comments on the suitability of increasing the number of pitches (by 2 pitches) at the existing Traveller site at Willows End in Guarlford?
- Question 8 Deleted
- Question 9 Do you have any comments on the suitability of increasing the number of pitches (by 2 pitches) by extending the existing Traveller site at Blossom Hill, Village Street in Aldington?
- Question 10 Do you have any comments on the suitability of land at Hughes Barn, Bretforton Rd, Badsey as a potential new permanent Traveller site for 6 pitches?

Meeting the Need for Developable Pitches and Plots (for 2024/25 to 2028/29)

The Government's Planning Policy for Traveller Sites says that local planning authorities should identify a supply of specific, developable sites or broad locations for growth, for years' six to ten.

The Worcestershire GTAA suggests a need for 32 Traveller pitches and 2 Travelling Showpeople plots in south Worcestershire between 2024/25 to 2028/29. These longer-term requirements make no allowance for turnover on existing pitches and plots and are therefore indicative and liable to change in the future.

The SWDP allocates up to 20 pitches on the urban extensions set out in policies SWDP 45/1 and SWDP 45/2. In the first Preferred Options it was suggested that 2 new sites could be accommodated at the Worcester urban extensions – one at Worcester South (SWDP45/1) and the other at Worcester West (SWDP45/2) with up to 10 pitches on each site. Not all of the land within the urban extensions is considered suitable for new Traveller sites because of various constraints. In such cases, where a planning application has been submitted and it is supported by an agreed detailed assessment of the allocation's suitability for traveller sites, an off-site contribution may be sought instead subject to viability considerations. In other instances Policies SWDP45/1 and SWDP 45/2 will be applied unless subsequent detailed assessment suggests the remaining allocated land is unsuitable for Traveller sites. The SWC are mindful of the policy requirements established by SWDP45/1 and SWDP45/2 and agree that this is the preferred means of providing new Gypsy and Traveller sites for years 6 to 10, nevertheless, it would be prudent to have an alternative option should these sites fail to deliver – i.e. to indicate broad locations of growth.

Broad locations for growth are shown on Figure 1, which shows areas within 800 metres (the recognised threshold beyond which it is very unlikely people would walk to access a service) of a town or Category 1, 2 or 3 settlement excluding land within either the Green Belt or Areas of Outstanding Natural Beauty (in accordance with the Site Assessment Methodology and reflecting SWDP 17Ci). In the ten year period, April 2007 to March 2017, 66 Traveller pitches were granted consent in South Worcestershire within 800 metres of towns or Category 1, 2 or 3 settlements. It therefore seems reasonable to assume that further windfall sites will come forward within or on the edge of towns or Category 1, 2 or 3 settlements through the development management process to meet any outstanding need in the period to 2027. Windfall development proposals will be assessed in accordance with the criteria in

Policy SWDP17 and the policies in this Traveller and Travelling Showpeople Site Allocations DPD.

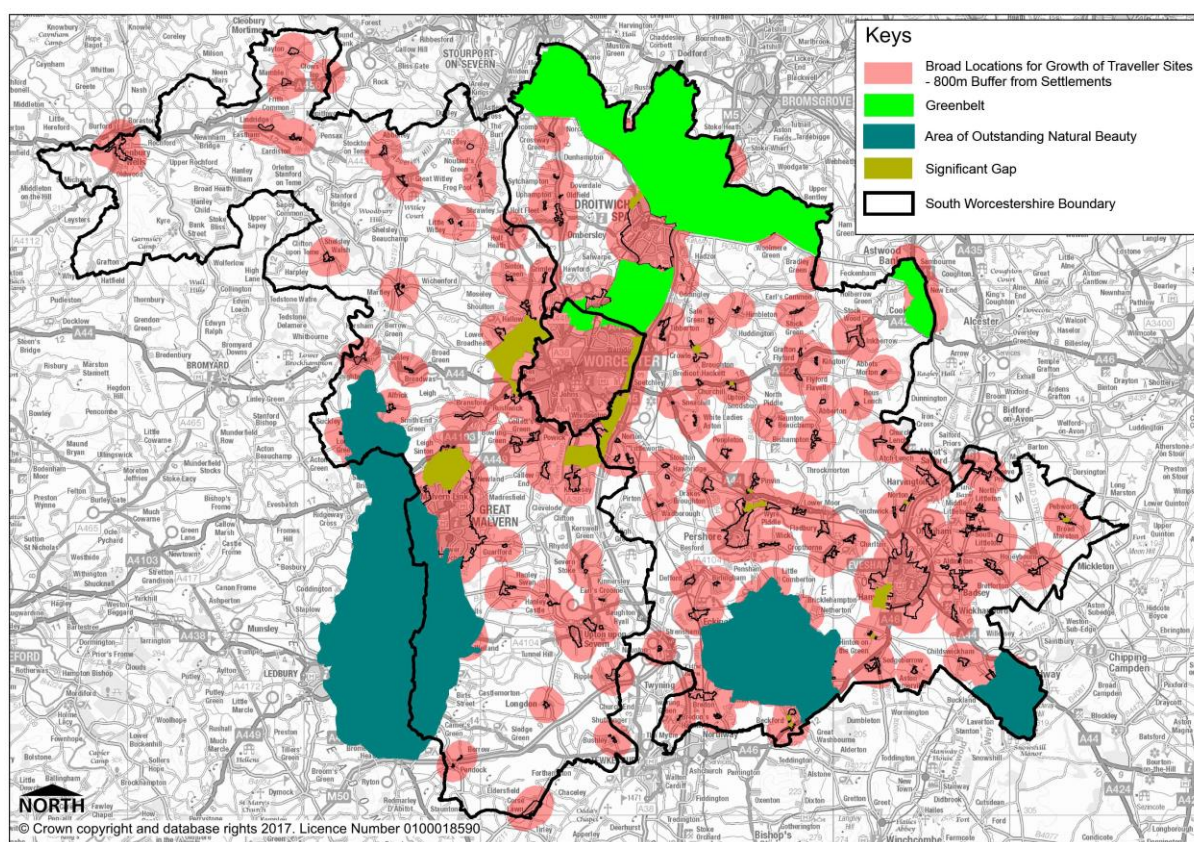


Figure 1: Broad Locations for the Growth of Sites for Travellers and Travelling Showpeople

The SWC will monitor the longer-term need for pitches and plots in light of future updated turnover rates and sites granted planning permission through the development management process which will count towards meeting the need for pitches beyond 2024.

Questions on the Proposed Developable Sites

The SWC propose to allocate 2 sites of up to 10 pitches in each in the two large Worcester urban extensions (Worcester South SWDP45/1 and Worcester West SWDP45/2) as per policy SWDP17, but also to indicate the broad locations for growth where windfall development may be acceptable in case one or both of the urban extension sites do not come forward. The broad locations for growth are shown in Figure 1 above.

Question 11 Do you agree with the SWC proposed approach towards meeting the medium term (for years 6 to 10) need for pitches?

If no, please give reasons.

4. Other Planning Issues

Tenure of New Pitches and Plots

The Worcestershire GTAA indicated a desire amongst Travellers for a mixture of private and socially-rented sites.

In the 2016 Preferred Options consultation respondents indicated that there could be difficulties in assessing applicant's incomes and establishing discounted market values for pitches.

Question on Tenure

Question 12 Do you have any suggestions as to how the SWC can encourage the provision of socially rented pitches?

Nomadic Habit of Life

The Government's Planning Policy for Traveller Sites (August 2015) says that in determining whether persons are Gypsies and Travellers for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

The Government has not provided guidance on how long someone would need to cease travelling, or in what circumstances, before they are no longer classed as a Traveller for the purposes of planning policy. Currently, there is also no Government guidance for councils on the criteria that they should use to assess whether Gypsies and Travellers live a nomadic lifestyle.

The Worcestershire GTAA indicated that only 28% of the Gypsy and Traveller families in the county had travelled in the previous year. 76% of the Travelling Showpeople households interviewed had travelled in the previous year.

In the 2016 Preferred Options consultation respondents suggested information could be sought from applicants on their working locations over the previous 5 years and how long the Travellers are away from the site.

Question about Nomadic Habit of Life

Question 13 When determining planning applications the SWC will have to assess whether persons are Gypsies and Travellers for the purposes of planning policy. Do you have any suggestions about how the SWC should assess whether Gypsies and Travellers are leading or have permanently ceased their nomadic habit of life?

If yes, please provide suggestions.

Rural Exceptions Sites

The Government's Planning Policy for Traveller Sites says that local planning authorities should very strictly limit new Traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan.

Planning Policy for Traveller Sites (paragraph 15) however also says that if there is a lack of affordable land to meet local Traveller needs, local planning authorities in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable Traveller sites. This may include using a 'rural exception sites' policy for Traveller sites that should also be used in the determination of planning applications.

A 'rural exception site' policy enables small sites to be used, specifically for affordable Traveller sites, in small rural communities, that would not normally be used for Traveller sites. Rural exception sites should only be used for affordable Traveller sites that are secured in perpetuity. A 'rural exception site' policy would seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection to the local area, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.

In south Worcestershire virtually all of the Traveller sites coming through the Development Management process are for private family sites and are therefore not meeting the needs of those households who cannot afford private sites. The SWC consider that it is not necessary to have a specific policy for 'rural exception' Traveller sites because such applications can be judged against the criteria provided in policy SWDP17.

In the 2016 Preferred Options consultation respondents were concerned that such sites would be a blight on the countryside.

Question about Rural Exceptions Sites

Question 14 Do you agree that there is not a need for a rural exception site policy for Traveller sites?

If yes, please give reasons.

If no, please give reasons.

Site Design Considerations

Once sites have been allocated and/or detailed applications for Traveller or Travelling Showpeople development are submitted, it is considered that applications would need to be assessed against more detailed considerations to ensure that sites are appropriately designed.

DCLG published a Good Practice Guide titled "Designing Gypsy and Traveller Sites" in 2008. The Good Practice Guide was cancelled in August 2015 when the Government published its revised Planning Policy for Traveller Sites. This has left a gap in good practice guidance that this DPD needs to address.

To ensure that Travellers and Travelling Showpeople sites are appropriately designed the SWC propose that new Traveller or Travelling Showpeople sites should incorporate the following design principles:

- Generally sites should provide a maximum of 10 pitches/plots to provide a comfortable environment for residents which is easy to manage.
- Access/turning space should be sufficient for emergency vehicles and comply with Fire Service requirements.
- The design/layout should clearly define individual pitches but without 'enclosing' them too much with inappropriately high, close-boarded fencing. Communal areas without clear usage should be avoided as they may attract vandalism, fly-tipping or unauthorised caravans.
- Appropriate landscaping proposals, to include where necessary, hard landscaping, fencing and boundary treatment to soften any visual impact and protect amenity but not enclose and separate the site so much that it hampers cohesion with the neighbouring settled community.
- It is essential that there is a mains water supply and mains electricity for each pitch, sufficient to meet the reasonable requirements of the residents.
- Wherever it is economic to do so, each pitch should be connected to a public sewer. Where this is not possible, provision must be made for discharge to a properly constructed sealed septic tank.
- Look for opportunities for Sustainable Drainage Systems.
- Accommodate a travelling lifestyle by provision of room for at least one touring caravan per pitch in addition to a mobile home.
- Schemes should make clear what commercial activity, if any, would be carried out on the site and where.
- Proposed amenity buildings or day rooms should be the minimum size necessary to provide required facilities, be sensitively sited, and use sympathetic materials.
- Details of the keeping of animals to be submitted with applications.
- Details of external lighting should be submitted and kept to a minimum

In the 2016 Preferred Options consultation respondents suggested that the sites should be local authority controlled; limit employment uses; residents should have local links; service infrastructure should be available; restrictions on external lighting, number of vehicles and noise from sites.

Questions on Site Design Considerations

Question 15 To ensure that Traveller and Travelling Showpeople sites are appropriately designed the SWC propose that detailed policy considerations should be included in this DPD. Are there any other design policy considerations that

need to be identified?

If yes, please provide details of other design considerations.

Safeguarding of Sites

To ensure that permitted levels of Traveller and Travelling Showpeople accommodation are maintained the SWC propose that existing sites and any proposed new sites (where there is no personal occupancy restriction) are safeguarded for Traveller and Travelling Showpeople use in perpetuity. This would ensure that the accommodation needs of the Traveller community continue to be met in the long term and that the development or redevelopment of land on safeguarded sites for uses other than for Gypsy and Traveller accommodation would not normally be permitted.

It is not considered appropriate to safeguard sites with permanent permission where a condition limits the occupation of the site to named individuals. The expectation with such sites is that if the named occupants no longer live there the use of the site would cease and the site would be restored in accordance with the relevant condition(s) attached to the planning permission.

Where sites are granted temporary permission with a personal occupancy restriction and the site ceases to be occupied by the named individuals the site should be restored in accordance with the relevant condition(s) attached to the planning permission.

In the 2016 Preferred Options some consultation respondents indicated that sites should be time limited because of Travellers transient way of life whilst others felt that sites should be safeguarded for Traveller use if of a reasonable standard.

Question on Safeguarding Sites

Question 16 Do you agree that existing sites and potential site allocations (where there is no personal occupancy restriction) should be safeguarded for Traveller and Travelling Showpeople accommodation use in perpetuity?

If no, please give reasons.

General

In the 2016 Preferred Options consultation respondents indicated that the distribution of existing Traveller sites is not reflected equally across Worcestershire and therefore does not enable Travellers to live in other areas; sites are over concentrated in certain areas with no apparent upper limit; Travellers should become more involved in local life; if sites are too large they lead to more friction between local and travelling communities.

Question 17 Are there any other comments you wish to make about this Traveller and Travelling Showpeople Site Allocations Development Plan Revised Preferred Options Document?

5. Next Steps

The timetable for the preparation of the TTS DPD is outlined in each of the SWC Local Development Schemes, published in Autumn 2016.

The proposed timetable for the development of the TTS DPD is summarised as follows:

Stage	Timetable
Commencement	September 2014
Preferred Options Consultation	May – June 2016
Revised Preferred Options (Regulation 18) – 6 weeks	February - April 2018
Publication (Regulation 19)	August - September 2018
Submission (Regulation 22)	November 2018
Independent Examination (Regulation 24)	January 2019 <i>Precise dates of examination hearing sessions will be determined by the Inspector</i>
Receipt of Inspector's Report (Regulation 25)	June 2019
Adoption (Regulation 26)	July 2019

The next stage in the process will be for the SWC to consider and assess responses to the Revised Preferred Options consultation.

A Draft DPD will then be prepared, including the recommended final site allocations. The Draft DPD will be consulted on at the Publication stage in September 2018, the Draft DPD, together with the representations received on it, will be submitted to the Secretary of State in November 2018.

An Examination in Public will follow and the Inspector will then publish their report. Subject to the Plan being found sound it will then be adopted.

Appendix 1

Glossary

Authorised Site: A site with planning permission for use as a Traveller or Travelling Showpeople site. These sites can be private or Council-owned. Most authorised sites in south Worcestershire are permanent, but they can sometimes be temporary (see 'Temporary Sites').

Call for Sites: The way in which the councils give the public an opportunity to suggest sites for potential Traveller or Travelling Showpeople development. Respondents filled out a form with the details of the suggested site which was then considered by the councils.

Caravans: Mobile living vehicles - includes touring caravans. Section 29 (1) of the Caravan Sites and Control of Development Act 1960 Act defines a caravan as 'any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted'.

Category 1, 2 and 3 Settlements: The results of the Village Facilities and Rural Public Transport Survey enabled a hierarchy of settlements to be ranked according to their sustainability and access to local services. Category 1 settlements have at least four key services in the Village Facilities Survey. Category 2 settlements have at least two key services including a shop and have access to at least daily public transport services for employment and shopping purposes. Category 3 settlements have at least one key service (other than a parish / village hall) and have access within the settlement to at least a daily bus service to a "designated town".

DCLG: Department for Communities and Local Government. Government department responsible for making the planning system work efficiently and effectively, including planning for Gypsies, Travellers and Travelling Showpeople.

Development Plan: A document setting out the local planning authority's policies and proposals for the development and use of land and buildings in the authority's area. This includes adopted Local Plans and Neighbourhood Plans. The Traveller and Travelling Showpeople Site Allocations DPD will be one of the Local Plans that form part of the Development Plan for south Worcestershire.

Green Infrastructure: Green Infrastructure and Green Space are the network of green spaces that intersperse and connect our cities, towns and villages, providing multiple benefits for environment, economy and communities. The components of Green Infrastructure and Green Space include biodiversity, landscape, historic environment, access and recreation and water.

Gypsies and Travellers: Defined by DCLG Planning Policy for Traveller Sites (August 2015) as "persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of Travelling Showpeople or circus people travelling together as such". When determining whether persons are "gypsies and travellers", Planning Policy for Traveller Sites says that "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, and whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances."

Gypsy and Traveller Accommodation Assessment (GTAA): This was a study carried out for the six Worcestershire districts to assess the need for additional Gypsy, Traveller and

Travelling Showpeople accommodation in the County, including the SWC. The Worcestershire GTAA was published in November 2014.

Mobile Home: Legally a caravan but not normally capable of being moved by towing, may also be known as a 'trailer', 'static caravan' or 'chalet'.

National Planning Policy Framework (NPPF): NPPF sets out the Government's planning policies for England and how these are expected to be applied.

Perpetuity: For all time, for eternity, for always.

Pitch: Area of land on a Gypsy/Traveller site required to accommodate one household and their caravans, parking space and enough room for turning vehicles. There is no 'one-size fits all' measurement for a pitch; as with standard housing, this depends on the size of individual families and their particular needs.

Plot: A piece of land of unspecified size which accommodates Travelling Showpeople's caravans, trailers, mobile homes and sometimes equipment. This terminology differentiates between residential pitches for Gypsies and Travellers and mixed-use plots for Travelling Showpeople, which will need to incorporate space or be split to allow for the storage of equipment such as fairground rides. These areas used for storage are also called 'yards'.

Site: An area of land where Gypsy/Travellers live. These can be privately owned (often by particular families) or socially rented (where the site is owned by a council or registered social landlord). A site may consist of a single pitch, or may have a number of pitches and be home to several families/households.

Stopping places: A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Temporary Site: This is an authorised site that has been granted temporary planning permission. At the end of the specified time period (usually between 2-4 years, defined by a planning condition) the use of the site must cease and the site should be restored to its former condition.

Tolerated site: An unauthorised encampment/site where a local authority has decided not to take enforcement action to seek its removal.

Transit site: A permanent site intended for short-term temporary use by Travellers on the move. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Travelling Showpeople: Defined by DCLG Planning Policy for Traveller Sites (August 2015) 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 family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above".

Turnover rate: Indicates the number of pitches available annually due to turnover of stock. Turnover enables existing stock to absorb current and future households considered in need.

Unauthorised Encampment: Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner's consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the land owner to take enforcement action in conjunction with the Police.

Unauthorised Development: Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not classed as Unauthorised Encampments in that they cannot trespass on their own land – they are therefore Unauthorised Developments and enforcement is always dealt with by Local Planning Authorities enforcing planning legislation.

Appendix 2

Site Assessment Criteria and Detailed Considerations

The following essential and desirable site criteria are based on:

- Planning Policy for Traveller Sites (DCLG, 2015)
- SWDP Policy SWDP17
- Good Practice Guide: Designing Gypsy and Traveller Sites (DCLG, 2008, cancelled in August 2015), and
- General preferences of the Travelling community, based on published reports and the Worcestershire Gypsy and Traveller Accommodation Assessment (GTAA)

The site assessment methodology differentiates between 'essential' criterion which must be satisfied if a site is to be acceptable and 'desirable' criterion which are important sustainability criteria, but may not be essential for a site to be acceptable.

Essential Site Criteria

Availability	• Whether the landowner is willing to sell or is interested in developing the site for Gypsy, Traveller and Travelling Showpeople purposes.
Suitability	
<i>Physical Constraints</i>	• Whether the site is within, or on the edge of⁶, a town or Category 1, 2 or 3 settlement⁷ or within a proposed urban extension. • Whether the site is outside Flood Zone 1 or vulnerable to surface water flooding. • Whether the site is located on relatively flat and stable land. • Whether the site is affected by contamination which cannot be mitigated. • Whether the site has safe and convenient access to the public highway.
<i>Environmental, Historic or Landscape Constraints</i>	• Whether the site is within an International (Special Protection Area, Special Area of Conservation or Ramsar) or National planning designation (Sites of Special Scientific Interest, National Nature Reserves, Areas of Outstanding Natural Beauty, Ancient Woodlands, Veteran Trees, Scheduled Ancient Monuments, Registered Historic Parks and Gardens, Listed Buildings). • Whether there are any local designations affecting the site (including Local Nature Reserves, Local Wildlife Sites, Sites of Importance for Nature Conservation, Local Geological Sites, Local Heritage Assets, Conservation Areas, Local Green

⁶ 'On the edge of' equates to 800m from the development boundary – in this case the distance is measured along the road network and is not a radius measurement from the site.

⁷ Category 1, 2 and 3 Settlements - The results of the Village Facilities and Rural (Public) Transport Survey enabled a hierarchy of settlements to be ranked according to their sustainability and access to local services. Category 1 settlements have at least four key services in the Village Facilities Survey. Category 2 settlements have at least two key services including a shop and have access to at least daily bus services for employment and shopping purposes. Category 3 settlements have at least one key service (other than a parish / village hall) and have access within the settlement to at least a daily bus service to a "designated town".

	Space, Tree Preservation Orders). • Whether the site is within the Green Belt⁸. • Whether the site falls within a Significant Gap. • Whether there are any known protected species or habitats recognised in the Biodiversity Action Plan on the site.
<i>Potential impacts</i>	• Whether there is any likely adverse visual impact which cannot be adequately minimised. • Whether there is likely to be any adverse impact on privacy and residential amenity for both site residents and neighbouring land uses which cannot be mitigated. • Whether the site (and possible number of caravans stationed) respects the scale of, and would not dominate, the nearest settled community. • Whether there is likely to be any adverse impact from noise for both site residents and neighbouring land uses which cannot be mitigated.
Achievability	• 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 - or whether there are any likely abnormal costs which would prejudice the ability of the site from being developed.

Proposed Desirable Sustainability Criteria

Suitability	
<i>Sustainability Criteria</i>	• Whether the site is accessible by walking, cycling and public transport to local services and facilities including shops, schools and health facilities. • Whether the site would be an extension to or intensification of an existing serviced site. • Whether the site would be on previously developed land. • Whether the site would have an adverse impact on the Green Infrastructure and Green Space as identified in SWDP 5.

⁸ An exceptional limited alteration to the Green Belt boundary would be required for such a site to be considered (DCLG (2015) Planning Policy for Traveller Sites (DCLG, 2015))

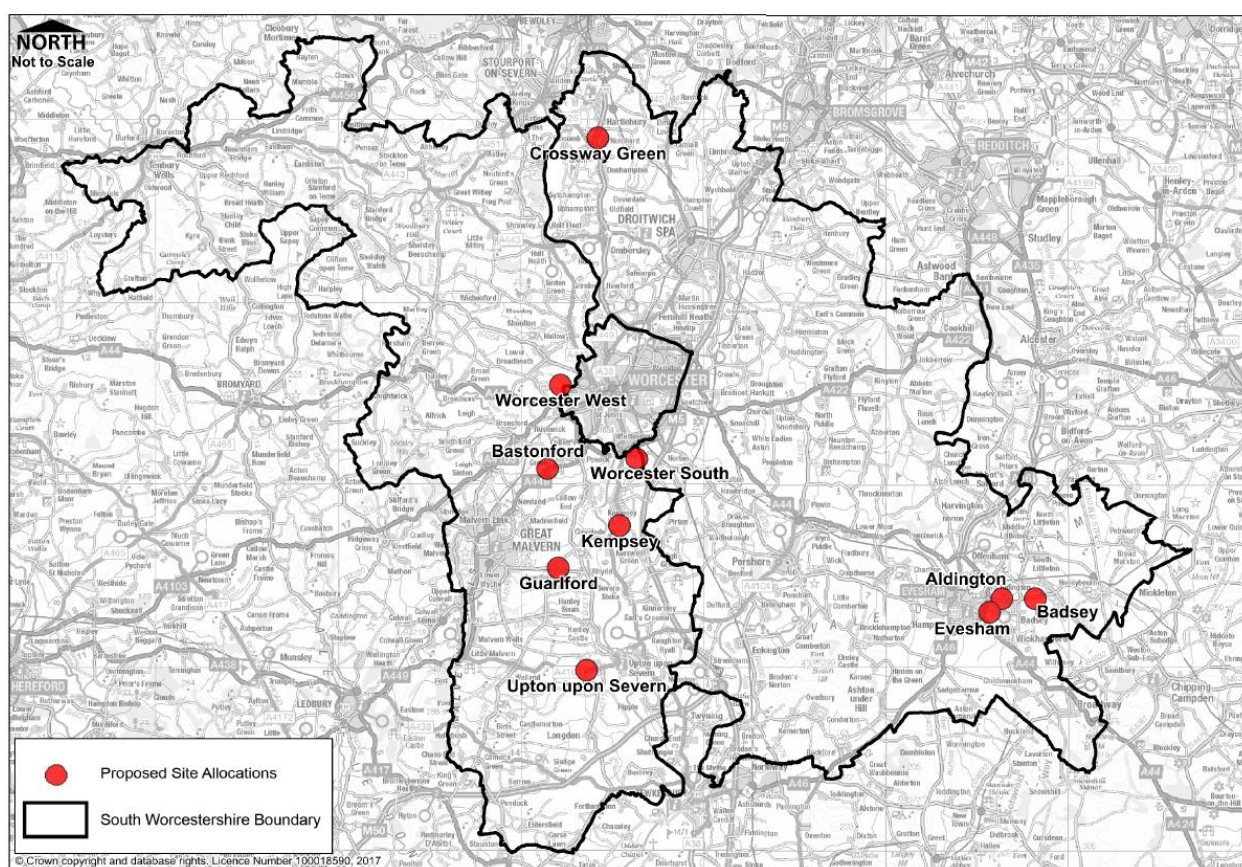
Appendix 3

Proposed Site Allocations for Traveller and Travelling Showpeople

To meet the need for 26 deliverable permanent residential Traveller pitches in the period to 2022/23 the SWC propose that new or additional pitches be allocated at 7 existing or new sites. The location of the proposed deliverable sites is shown in Figure 2.

Figure 2

Location of Proposed Deliverable and Developable Sites⁹



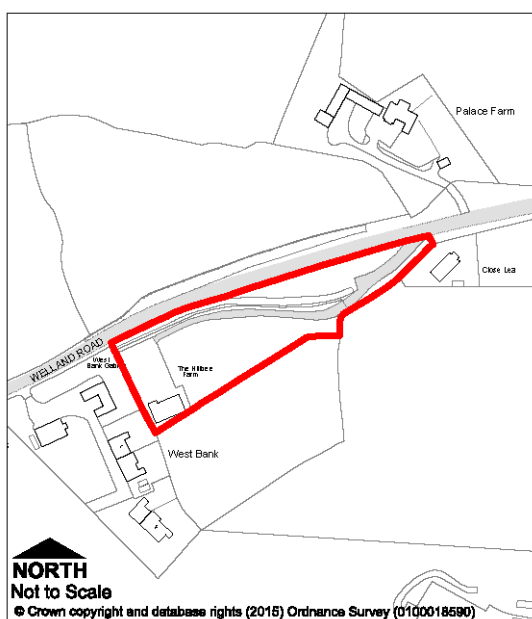
Details of the each of the sites suggested to accommodate the new pitches are given below.

⁹ The site at Kempsey is no longer included in the Revised Preferred Options because the landowner confirmed on 30 Jan 2018 that it is not available for Gypsy and Traveller use but instead want it considered for Travelling Showpeople use. The Council has not yet had the opportunity to assess the site for Travelling Showpeople use and therefore the site does not form part of the Revised Preferred Options consultation.

Site at Hillbee Farm, Welland Road, Upton upon Severn

Potential Pitch Provision: 3 additional pitches

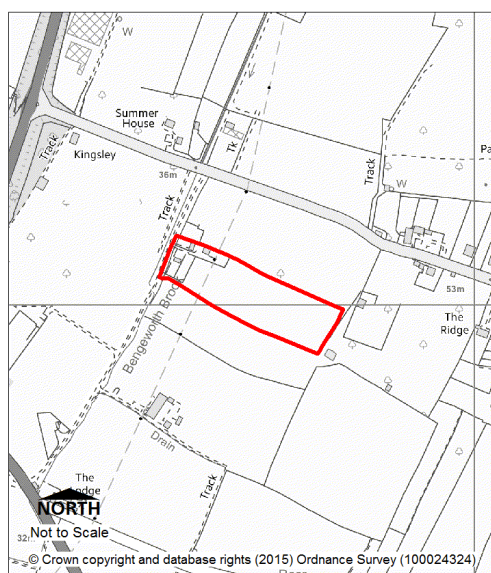
- The site has been identified by the landowner as being available for Traveller use.
- It is an existing authorised Traveller site with planning permission for 2 caravans.
- The site is located 450 metres from Tunnel Hill and comprises a paddock with a static mobile home and hard standing for a touring caravan. Adjacent uses include mainly farmland as well as 7 residential properties within 50 metres from the site.
- The site is relatively flat and not affected by flooding.
- There are no international or national planning designations affecting the site. The site would not have a significant impact on local designations that cannot be mitigated.
- The site takes access from A4104 within a 40mph speed limit. The highway authority have indicated that they would need evidence that an appropriate level of visibility could be provided for the actual traffic speeds on the road and would also require alterations to the access so that vehicles could make the left turn out of the site without crossing onto the far side of the carriageway.
- The existing site is well screened and intensification of the site is unlikely to have a significant impact on the landscape.
- There are seven residential properties within 50 metres of the site but the impact on the residential amenity for the site residents or neighbouring properties is unlikely to be significant because of existing screening.
- The site has, and is capable of providing, on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.
- The site has good access to health services and schools in Upton upon Severn.



Site at The Orchard, Knowle Hill, Evesham

Potential Pitch Provision: 5 additional pitches

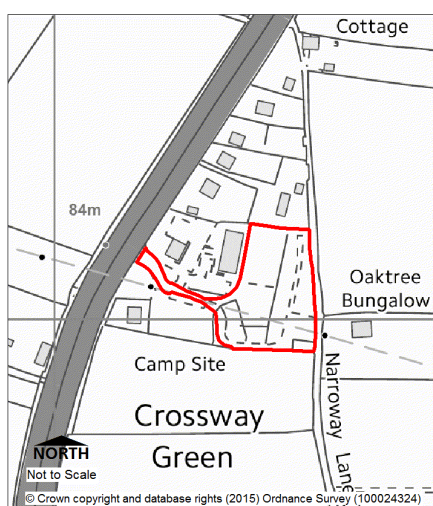
- The site has been identified by the landowner as being available for Traveller use.
- This is an existing Traveller site with planning permission for 1 mobile home and 2 tolerated pitches. The site is located 300 metres from Evesham. Adjacent uses include farmland and woodland as well as residential properties approximately 120 metres from the site, but on a slope overlooking the site.
- The site is relatively flat and not affected by flooding.
- There are no international or national planning designations affecting the site. The site would not have a significant impact on local designations that cannot be mitigated.
- The site is considered to have safe access to the highway.
- The existing site is well screened to the west and along its eastern extremity there is a woodland which is on land that slopes up from the site. However, additional planting would be required along the other boundaries to reduce the impact on the landscape. There are approximately 8 residential properties within 200 metres of the site. Although the impact on the residential amenity for the site residents or neighbouring properties is unlikely to be significant because of existing screening, but additional planting would be beneficial.
- It is not proposed that the whole of the site would be used to accommodate new pitches but to concentrate them on the western half of the site close to the existing pitches this would help to ensure that the size of the site and the number of pitches are of an appropriate scale for the location.
- The site has on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.
- The site is approximately 1800 metres from Bengeworth Primary School.



Site at Shorthill Caravan Park, Crossway Green

Potential Pitch Provision: 10 new pitches and 5 Transit pitches

- The site is subject to temporary planning permission granted on appeal for 10 residential pitches, 1 managers pitch (occupation of this pitch is not restricted to a traveller) and 24 transit pitches in July 2015. The temporary planning permission is due to expire in July 2019, but there is a current pending application to make the temporary use permanent (w/17/01008/CU)
- The site is located 550 metres from Crossway Green and is within 300metres of a bus stop and 500 metres of a shop. Adjacent uses include Travel Lodge and restaurant, caravan sales forecourt as well as a group of approximately 10 residential properties 2 of which are immediately adjacent to the site.
- The site is relatively flat and not affected by flooding.
- There are no international or national planning designations affecting the site. The site would not have a significant impact on local designations that cannot be mitigated.
- The site is considered to have safe access to the highway although part of it is shared with the Travel Lodge and restaurant.
- The site is well screened to the A449 and the Inspector determining the appeal considered that the combination of the existing planting and additional fencing proposed would further isolate the site visually from the adjoining properties. Furthermore, the site would not be visually obtrusive in the wider landscape.
- The size of the site and the number of permanent pitches is considered to be of an appropriate scale for the location and is not considered to dominate the nearby homes. However, the appeal Inspector considered that if most of the 24 transit pitches and the 10 permanent pitches were occupied at the same time then the development could be regarded as having the potential to dominate the nearby group of houses. Therefore, it is suggested that the allocation be for 10 permanent pitches, 1 managers pitch (which does not count as a Travellers pitch) and only 5 transit pitches for Travellers, the latter is the number identified in the GTAA for transit pitches.
- The site is capable of providing on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.



Site at Mountain View, Bastonford

Potential Pitch Provision: 2 new pitches

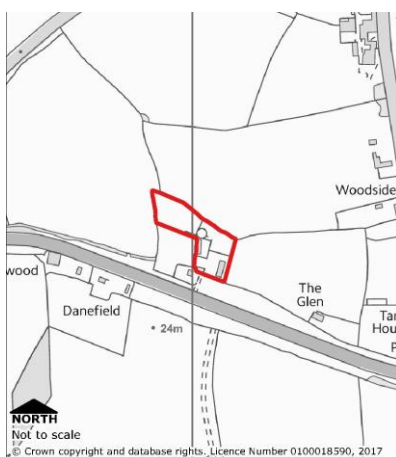
- The site has been identified by the landowner as being available for Traveller use.
- It is an existing authorised Traveller site with temporary planning permission for up to 4 touring caravans for a named family. The temporary planning permission expires in November 2019.
- The site is located in the countryside at the northern end of the hamlet of Bastonford. There is a mature hedge along its northern boundary and the A449 Malvern Road lies beyond that. To the south and west, the plot adjoins agricultural land. To the east, the site adjoins the Old Malvern Road which provides access to Bastonford. It is linked to the A449 a short distance to the north of the site and then further to the south at the southern end of the hamlet.
- The site is relatively flat and not affected by flooding.
- The nearest residential property lies about 70m to the south.
- Access to the site is gained via Old Malvern Road. The Highways Authority have indicated that the junction with the A449 is reasonable although there may be a need to provide a proper ghost island facility for right turning vehicles depending on the predicted level of traffic accessing the site. There is a concern about the level of visibility available to the left on exit and to the rear of the vehicle turning right into the site. This is exacerbated by the potential length of the vehicles accessing the site. The Highways Authority have indicated that when the vehicle speeds on this part of the highway are known it may be found that it is acceptable.
- Notwithstanding its countryside location, the appeal site is not subject to any landscape or ecological designations.
- The Planning Inspector in the Planning Appeal in September 2016 concluded that whilst the Traveller site would have an adverse impact on the landscape character of the site itself, this would not extend to the wider area including the AONB. The Inspector considered landscaping would improve the visual impact from some viewpoints but the residual harmful effect of the development would remain significant, particularly when seen from public viewpoints on higher ground.
- The site has, and is capable of providing, on-site services for water supply and mains electricity.
- The site has good access to health services and schools in Powick.



Site at Willows End, Guarlford

Potential Pitch Provision: 2 additional pitches

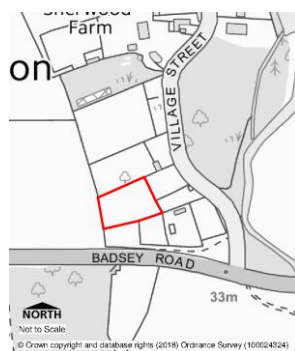
- The site has been identified by the landowner as being available for Traveller use.
- It is an existing authorised Traveller site with planning permission for 2 mobile homes.
- The site is located on the Rhydd Road (B4211) 620 metres from Guarlford and comprises a paddock with a static mobile home and hard standing. Adjacent uses include mainly farmland as well as a residential property within 30 metres of the site.
- The site is relatively flat. The area is susceptible to 1 in 200 year surface water flooding.
- There are no international or national planning designations affecting the site.
- A site of Local Wildlife Importance (Grassland Marshland Open Water – ditch scrub) runs along Rhydd Road. This runs across the entrance to the site, but is not on the site.
- The highway authority has noted that there is a wide verge across the site frontage which appears to provide the necessary visibility. The highways authority has indicated that the red line plan does not include the access to the highway but it is assumed that this can be achieved. At present the access does not appear to be wide enough to allow for two way traffic but there appears to be sufficient land to make any necessary improvements. Traffic flows/speeds on the B4211 would need to be assessed but no capacity problems are anticipated with the site access.
- It is considered that a further additional 2 pitches to the rear (north) of the site would not have a significant additional landscape impact. They would be in the least visible part of the site as a whole.
- There are approximately 6 residential properties within 200 metres of the site.
- The size of the site and the number of pitches is considered to be of an appropriate scale for the location.
- The site has, and is capable of providing, on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage.
- The site has good access to health services and schools in Malvern.



Site at Blossom Hill, Village St, Aldington

Potential Pitch Provision: 2 additional pitches

- The site has been identified by the landowner as being available for Traveller use.
- This site is adjacent to two existing authorised Traveller sites with planning permission for 6 pitches in total.
- The site is located 150 metres from Aldington and 370m from Badsey. Adjacent uses include farmland as well as residential properties approximately 130 metres from the site but the impact on the residential amenity for both the site residents and neighbouring properties could be mitigated by additional planting.
- The site is on a slope rising up from the road but appears relatively stable and is not affected by flooding.
- There are no international or national planning designations affecting the site. The site is within 100m of a Special Wildlife Site – Littleton and Badsey Brook and tributaries but the site would not have a significant impact on local designations that cannot be mitigated.
- The site is considered to have the potential for safe access to the highway.
- Given the four existing plots on the adjacent existing site and the two additional consented plots, it is not considered that a further additional 2 plots to the rear (western half) of the proposed site would have a significant additional landscape impact. They would be in the least visible part of the site as a whole.
- There are approximately 14 residential properties within 200 metres of the site.
- The size of the site and the number of pitches in conjunction with the neighbouring sites are considered to be of an appropriate scale for the location.
- The neighbouring site has on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage and therefore it is assumed that the expanded site is capable of providing the same.
- The site is within 100 metres of a bus stop and 1,330 metres of a primary school in Badsey.



Site at Hughes Barn, Bretforton Rd, Badsey

Potential Pitch Provision: 6 new pitches

- The site has been identified by the landowner as being available for Traveller use.
- This site is adjacent to an existing authorised Traveller sites with planning permission for 3 pitches in total.
- The site is located 420 metres from Badsey and 600m from Bretforton. Adjacent uses include farmland and a traveller site. The nearest residential dwelling is approximately 170m from the site.
- The site is flat and open to the west and south has an existing access which is shared with the neighbouring traveller site.
- There are no international or national planning designations affecting the site.
- The size of the site and the number of pitches is considered to be of an appropriate scale for the location.
- The neighbouring site has on-site services for water supply, mains electricity, waste disposal and foul and surface water drainage and therefore it is assumed that the same could be provided for this new site.
- The site is within 170 metres of a bus stop, 1.2km of a shop and 1.1km of a primary school in Bretforton.

