

# **South Worcestershire Development Plan**

## **Traveller and Travelling Showpeople Policy and Site Allocations Development Planning Document (DPD) Proposed Submission**

### **Statement of Consultation (Final Draft)**

**September 2022**

## 1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who has been consulted on the Traveller and Travelling Showpeople Site Allocations Development Planning Document (DPD) Preferred Option, when and how, and summarises the representations received and how they have influenced the Traveller and Travelling Showpeople Policy and Site Allocations DPD.

## 2. Name and Purpose of the DPD

### ***Name***

- 2.1 South Worcestershire Traveller and Travelling Showpeople Policy and Site Allocations Development Planning Document (DPD) Proposed Submission

### ***Purpose***

- 2.2 The purpose of the Traveller and Travelling Showpeople Policy and Site Allocations DPD is:
- In light of the delay of the SWDPR it is proposed to remove policy SWDPR19 (Meeting the needs of Travellers) from the SWDPR and include it (and a design policy) within this DPD to meet the needs as set out in the policy and the Gypsy and Traveller Accommodation Assessment (GTAA). It will also include reference to the SWDP allocations at Worcester South (WDP45/1) and Worcester West (SWDP45/2)
- 2.3 It is intended for use by all interested parties including Travellers, developers, planning agents and the general public. It seeks to clarify where new pitches are allocated for Travellers to meet the need for the first 10 years (known as deliverable sites).

## 3. Who was Consulted on the DPD

- 3.1 The Traveller and Travelling Showpeople Site Allocations DPD consultation was targeted towards those organisations, agents and developers with an interest in Travellers and Travelling Showpeople and the Travellers themselves. Also consulted were: the Parish Councils and residents within 200m of a proposed Traveller site allocation (both new ones and existing Traveller site where additional

pitches were proposed) within the Preferred or Revised Preferred Options document. Furthermore, the statutory consultees set out in regulation 4 of The Town and Country Planning (Local Planning) (England) regulations 2012 were all consulted. Appendix 1 provides an overview of the types of organisations consulted. A collaborative approach has been taken to the preparation of the Traveller and Travelling Showpeople Site Allocations DPD; relevant internal colleagues have been directly involved in contributing to and reviewing the draft.

#### **4. How Were People Consulted?**

4.1 A Traveller and Travelling Showpeople Site Allocations DPD has been the subject of previous public consultation exercises for the Preferred Options during 2016 and 2018. The latest Preferred Options consultation was scheduled to run for seven weeks from 1 March to 19 April 2021 and subsequently ran from 17 May to 5 July 2021 due to Purdah issues surrounding local elections.

##### **Preferred Options Consultation:**

4.2 During May to July 2021 the SWC consulted on the Preferred Options for how the future accommodation needs of Travellers and Travelling Showpeople can be met. The consultation document identified five 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.

4.3 **Public Consultation:** The approaches to public consultation on planning policy documents relating to the statutory stages of plan making are set out in the 2018 adopted Statement of Community Involvement. In accordance with the revised regulations issued in July 2020 regarding public consultation in the planning process, since the advent of Covid-19 the SCI was temporarily amended in October 2020. Essentially this amended any of the 'face to face' requirement to ensure social distancing could be observed in accordance with Government guidance.

4.4 The public consultation ran for seven weeks from 17 May to 5 July 2021. The consultation documents and any supporting information were placed on deposit in the following locations:

- Council reception or contact centres
  - Public libraries (where open)
  - Relevant council websites and the SWDPR website
- 4.5 All the statutory bodies, neighbouring local authorities, parish councils, organisations and individuals held on the SWDP database were advised via e-mail of the consultation and a press release was issued. In addition, householders within 200m of a proposed site allocation or proposed pitch increase to existing sites were also be notified of the PO consultation.
- 4.6 An on-line briefing was provided for Parish and Town Councils on 20 May 2021 6-7.30pm for Parish and Town Councils and 25 May 2021 6.30 - 8pm for local communities (both open to district and city councillors). This addressed the content and purpose of the consultation and provide a Q&A opportunity.

## **5. What Issues were Raised and how have these Been Addressed in the Traveller and Travelling Showpeople Site Allocations DPD?**

- 5.1 Approximately 60 responses were received, broken down by the following: 6 from public sector organisations, 16 from Parish and Town Councils, 5 from representatives of developers, \* 11 from other statutory consultees (outside of those mentioned above), with the remaining responses received from members of the general public and travellers.
- 5.2 In light of responses received to the consultation, the following sites have been removed:

### Malvern Hills:

- Hillbee Farm, Welland Rd, Upton upon Severn 3 pitches; due to concerns regarding highway safety.

### Wychavon:

- Hughes Barn, Bretforton Rd, Badsey 6 pitches; due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.

- Severn Acres, Main Road, Cropthorne due to gaining planning permission and being implemented.

5.3 Following the Travelling and Travelling Showpeople consultation, a meeting was held between the SWCs and the Planning Inspectorate on 14 October 2021. The Inspector queried our approach to the desired maximum distance from settlements and considered this to be too prescriptive because the Planning Policy for Traveller Sites (PPTS) does not refer to particular distances from a settlement. The Inspector noted that the provision of suitable accommodation from which travellers can access education, health, welfare, and employment infrastructure is an aim of Government policy (PPTS para 4) so accessibility considerations have some bearing on the location of sites. The Inspector's comments on this matter are noted and the reference to 800m from a development boundary of a town, category 1, 2 or 3 village has been dropped but officers felt that it was necessary to have some consistent measure of accessibility to services (PPTS refers to education and health services in particular). Officers therefore opted for 2km from a primary school (with flexibility to increase to 2.5km if there were insufficient sites to allocate). This would increase the potential range of sites that can be considered and has been included in the updated document. Subsequently the final list of site allocations is now:

Malvern Hills:

- The Paddocks, Newland, Malvern: 4 pitches

Wychavon:

- The Hill, Canada Bank, Charlton: 2 pitches
- The Orchard, Knowle Hill, Evesham: 5 pitches (please note the 5 pitches (3 new and 2 tolerated) from this site have now been granted planning consent and therefore 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 those already granted planning consent)
- Blossom Hill, Village St, Aldington (please note the pitches from this site have now been granted planning consent and therefore 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 those already granted planning consent)

- There are no site allocations for Travelling Showpeople in this DPD but it is anticipated that the Travellers site at Rushwick (refer SWDPR) could be developed for Travelling Showpeople.

5.4 Five new sites were suggested as part of the Preferred Options consultation;

- the former gas works, east side of Lower Howsell Rd, Malvern, of which when subsequently assessed, has been removed from the process due to contaminated land issues and Tree Preservation Orders on the site
- Green Lane, Naunton WR8 0PY in Malvern Hills, of which was removed from the process due to being more than 4km from a primary school
- Kimberley's Field, Field Barn Lane, Cropthorne and is not being carried forward due to an extant and implemented planning permission on the land for a Travelling Showpeople site, and
- Two sites either side of the Evesham Road, Lower Moor

5.5 Two responses were received having regard to the Sustainability Appraisal, with one making reference to the fact that the sites have not been assessed through the SA process and therefore their inclusion is not justified; and another making reference to no consideration being given to meeting the need in the medium term i.e., 6 – 10 years. A further response made reference to the SA in that it expects land instability to be properly considered prior to development, this therefore is not strictly relating to the SA.

5.6 There is a mixed consensus regarding the delivery of sites at the proposed strategic settlements / growth areas, with reasons against citing there is no evidence to suggest strategic allocations are appropriate locations for additional sites; and further concerns that, due to the lengthy process of allocating and developing a new settlement, the provision will not contribute to the need in the short and medium term.

## **Appendix 1: List of Consultees**

- Statutory Bodies listed in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012
- Parish and Town councils in Malvern Hills and Wychavon Districts where new pitches were proposed
- All adjoining District Councils
- All Parish and Town Councils adjoining Malvern Hills and Wychavon Districts
- Worcestershire County Council
- Travellers living on sites within south Worcestershire
- Traveller specific organisations – e.g., Showman’s Guild
- County and District Council officers responsible for Traveller and Planning matters
- Residents within 200m of a proposed allocation site – either new sites or to increase pitches at existing sites
- Developers and architects and their agents
- Libraries
- All District Councillors at Malvern Hills District Council, Worcester City Council and Wychavon District Council
- Health and public services organisations, e.g. NHS, police and Fire service (and adjoining ones)

## Appendix 2: Consultee responses

Table One: Traveller and Travelling Showpeople Site Allocations DPD Responses to latest Preferred Options Consultation (in 2021).

<u>Responder</u>	<u>Summary of comments</u>	<u>Officer Response</u>
Wychavon Council archaeologist	Comments on Hughes Barn: The site is within in area of known archaeological potential related to Romano-British occupation. There is also an elusive potential related to Anglo Saxon settlement but we have yet to tie down where that settlement was. Any application on this land which requires ground works will require archaeological evaluation and possible mitigation.	The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.
Badsey & Aldington PC	Of the 4 proposed sites, 3 are in Badsey. Wychavon has 200 of 244 and 74 out of the 104 new ones. Badsey also has 2 tolerated sites that have no permission but have been allowed on Sands Lane. There is a disproportionate number of sites in Wychavon and an increase of 13 pitches will only add to this. The site in Aldington has not fulfilled the conditions of the planning approval in 2015, additional pitches on this site will only exaggerate enforcement issues. Villages such as Badsey & Aldington are book ended, it is no good preserving conservation area in centre of villages if the access through traveller sites is not consistent with the areas. The exact need of Traveller sites should be further investigated before	There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits. Knowle Hill and Blossom Hill have now gained planning permission for extra pitches and consequently no further pitches are proposed for these sites in the DPD.



	any new pitches are considered.	
Bretforton PC	Of the 4 proposed sites, 3 are in Badsey. Wychavon has 200 of 244 and 74 out of the 104 new ones. Badsey also has 2 tolerated sites that have no permission but have been allowed on Sands Lane. There is a disproportionate number of sites in Wychavon and an increase of 13 pitches will only add to this. The site in Aldington has not fulfilled the conditions of the planning approval in 2015, additional pitches on this site will only exaggerate enforcement issues. Villages such as Badsey & Aldington are book ended, it is no good preserving conservation area in centre of villages if the access through traveller sites is not consistent with the areas. The exact need of Traveller sites should be further investigated before any new pitches are considered.	There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits. Knowle Hill and Blossom Hill have now gained planning permission for extra pitches and consequently no further pitches are proposed for these sites in the DPD.
Resident	Objects to Blossom Hill, Aldington: With the additional two pitches suggested, it would mean that there were nine pitches in this conclave. This is within 200m of several houses. Aldington is a small hamlet with about 90 houses and much of the area closest to these sites is in a Conversation Area. The number of pitches is already disproportionate in relation to the population which is against legislation, the additional two would add to the situation. This is not taking into consideration the number of Traveller pitches elsewhere in the village which make the question of ratio more serious. These increases are now	The concerns raised are noted. In any case, Knowle Hill and Blossom Hill have now gained planning permission for extra pitches and consequently no further pitches are proposed for these sites in the DPD.

	beginning to erode the character of the village and impinge on village life which the Government seeks to protect.	
British Pipeline Agency Limited	No objections	Noted.
Canal & River Trust	No objections	Noted.
Resident	Objects to Blossom Hill, Aldington: Strongly objects to further Traveller sites being placed within 200 metres of homes: will compound harmful visual impact of several existing traveller sites on each of the 2 roads serving the historic village of Aldington and its conservation area; adverse impact on row of Grade 2 listed buildings; concerned will result in increase in businesses operating from Traveller sites; sites are not dispersed across south Worcestershire but 3 out of 4 are within short distance of each other; dangerous road junctions serving Aldington; is dangerous walking to school from the village; lack of school places; loss of rural landscape with proliferation of caravans and associated buildings; already exceeded acceptable ratio of caravans to houses.	The concerns raised are noted. In any case, this site has now gained planning permission for an additional 4 pitches.
Resident	Objects to The Orchards, Knowle Hill: This consultation is a simplified regurgitation of the 2016 and 2018 preferred options. A 3rd call for sites in 2020 in a final attempt to justify this DPD when the previous 2 attempts failed seems pointless as Wychavon can demonstrate a 5 year supply of pitches and therefore does not need DPD. Remaining councils have not allocated sites and therefore the DPD is irrelevant.	Comments noted but the DPD is a joint DPD across south Worcestershire. The councils are required to plan for the future housing needs of all part of the community including Travellers and Travelling Showpeople. The lack of footpath and cycle access from the Traveller site at Knowle Hill is acknowledged but this is not unique to this site. The site is close to the edge of Evesham and therefore car journeys will be short – the site is therefore

	<p>The location at The Orchards is a sporadic mix of older housing and horticultural holdings along Badsey Lane accessed from either the A46T or Badsey Lane. It is restricted in width with no footpaths cycle ways, bus service or street lighting and no safe crossings. Residents are reliant on motor vehicles for access to local services and facilities. No infrastructure exists to promote or encourage other modes of journey. Knowle Hill is physically isolated from Evesham by the A46T and A44 with no footpaths or cycle ways on the A46 if pedestrians/cyclists access from Badsey Lane. Only a central refuge exists to aid crossing. The continuous fast flow of traffic on the A46T makes access by motorised vehicles from Badsey Lane difficult and potentially dangerous. This view has been supported with the refusals of a number of planning application and appeals for new housing. The DPD fails to respect the interests of the settled community.</p>	<p>considered to have reasonable access to services and facilities notwithstanding that the journeys are likely to be made in the car. The comments regarding the A46T are noted but the highway authority do not object to the principle of additional pitches on the site. The site now has planning permission for the 5 pitches (2 tolerated and 3 new) and consequently no further pitches are proposed in the DPD.</p>
<p>Drakes Broughton and Wadborough PC</p>	<p>Q1 and 2 Yes Q3 - 6, broadly in agreement Q7 Objects to new Traveller sites at new settlements – use brownfield sites not greenfield ones; lack of infrastructure.</p>	<p>Noted. Noted. Noted. Forward planning to locate traveller sites at the new settlements is an effective way of ensuring we meet our Traveller Site need. Furthermore, master planning is being undertaken at each of the new settlements meaning any proposed sites can be planned so that they can be positioned in the most suitable and sustainable location in relation to the new settlements.</p>

	<p>Q8: Travellers have private transport so do not agree sites should be within 800m of settlement</p> <p>Q10: Suggests an annual self-assessment for LPA to audit</p>	<p>This criterion has been removed instead it is suggested that sites should be 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. access to schooling.</p> <p>Noted.</p>
Earls Croome PC	<p>Q1 No – should also involve a third party that represents land/property owners and local people, such as the Country Land and Business Association or a similar organisation.</p> <p>Q3 Hillbee Farm - Access is onto a busy road with no provision for pedestrians and amenities are not within reasonable walking distance.</p> <p>Q8 Generally yes but where safety features such as footpaths and speed limits allow this should be flexible within a reasonable margin.</p> <p>Q9 To have a robust enforcement procedure to ensure the rents are paid.</p> <p>Q10 Travellers could have an official method of notification for them to inform their local Council of the periods when they will be travelling and the Council would monitor whether they have indeed</p>	<p>Noted, landowner agreement would be required before a site is allocated.</p> <p>Noted. Hillbee Farm is not being proposed for allocation on Highways Safety grounds.</p> <p>Noted. Ideally factors such as footpaths, speed limits, street lighting would be taken into account in the assessment of site accessibility to services but Traveller sites are often in rural areas where these opportunities are limited and therefore the selection of sites has to take this into account.</p> <p>Noted. Payment of rents is not a planning matter.</p> <p>Noted.</p>

	<p>vacated the site for the said periods.</p> <p>Q11 New sites are highly contentious and all local stakeholders and interested parties should be consulted and have their views fully considered. Travellers seem to be given preferential treatment over non-travellers. Suggest a trade-off e.g. local starter homes if new traveller sites granted planning permission in the area.</p>	<p>This consultation period is an opportunity for all to have their views formally taken into account with all nearby neighbours and interested parties written to. The allocation of pitches is subject to rigorous assessment with allocated sites done so with robust reasoning and supporting evidence. Travellers are not given preferential treatment.</p>
<p>Environment Agency</p>	<p>The bottom south-east corner of Hughes Barn, Bretforton Road, Badsey is located close to a well and there is a watercourse that issues here. (These features are shown on the OS map extract on page 29 of the PO document). There may also be other springs or issues present that aren't mapped , and potentially there may be private boreholes used in the area for drinking water (although our maps do not indicate there are any abstraction points or source protection zones here, and the aquifer status is Secondary Undifferentiated.). We highlight the above, as if mains foul drainage is not available at this location, then there may be some restriction as to the type of foul drainage to be used and where it discharges to (for example a soakaway or discharge from a package treatment plant or septic tank may not allowed to be located close to a borehole or well if it is used for drinking water. Given there is a reasonable amount of space at the site, we do not anticipate this to be a show stopper issue.</p>	<p>Noted. The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p>

Fisher German OBO Exolum Pipeline System	Sent location plan of their apparatus – none in south Worcestershire	Contents of Map noted and no impact on proposed Traveller sites.
Resident	<p>Q.1 – Pitchcroft is a suitable site.</p> <p>Q.2 – Transit pitches should be the only areas legally used and charge for their use with a retainer for any mess left behind.</p> <p>Q.3 – Charging systems and local infrastructure should be well regulated.</p> <p>Q.4 – Same as Hillbee</p> <p>Q.5 – Same as Hillbee</p> <p>Q.6 – Same as Hillbee</p> <p>Q.7 – Agree that there should be in an increase in transit areas if there is an increase in travellers, none should be for any set duration. Need more information as to the whereabouts of the pitches.</p> <p>Q.8 - Yes</p> <p>Q.9 – There should be legislation that only certain areas can have pitches which should be charged for.</p> <p>Q.10 – There should be monitoring the movements of travellers.</p> <p>Q.11 – No comments.</p>	<p>Noted. Pitchcroft has not been submitted as a potential site.</p> <p>Noted, this would not deliver enough sites for the SWCs to meet the need.</p> <p>Noted. This is not in the control of the Planning Process.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted. The location of the proposed pitches have been set out in the DPD.</p> <p>Noted.</p> <p>Noted. The DPD is aiming to provide pitches for travellers to meet their need but windfall applications will still need to be determined as and when they are submitted.</p> <p>This would be contrary to Travellers human rights.</p>
Fisher German OBO Residents	Object to Hillbee Farm site: A) is a question as to the sites access. 20/00173 was refused on highway grounds. New access involves third party land so question of whether this land would be available, also if access moved to improve visibility from east would lessen visibility from west and would be on higher ground therefore would not meet gradient requirements for an access. B) may create an adverse impact on privacy and	The concerns raised are noted. In any case, this site is not being proposed for allocation due to highways concerns.

	<p>residential amenity for both site residents and neighbouring land uses, which would need to be mitigated.</p> <p>C) Concerns about sustainability of site raised by highways in consideration of application - no suitable route for occupants of the proposed development to safely access the nearest bus stops.</p>	
Fladbury PC	<p>Q1 Yes, but 'suitable sites' need to be agreed with the local community, and not allowed in open countryside or in Cat.4 villages.</p> <p>Q2 Transit sites, if needed, should be distributed across the region close to major traffic arteries. Wychavon already has all the Transit Sites.</p> <p>Q7 The allocation of pitches on these sites should be specified and not exceeded.</p> <p>Q8 We believe that no Traveller or Travelling Showpeople sites should be located adjacent to Cat.4 villages or in open countryside. This limitation should also apply to extensions to existing sites.</p> <p>Q11 We believe that the travelling community should be subject to the same Planning Laws as the settled community. No new sites or extensions to existing sites should take place</p>	<p>Noted. Consultation periods allow for input from the local community. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>Noted. Each site will be assessed on its own individual merits. The SWCs cannot control how many sites are submitted for each authority.</p> <p>Noted. The number of pitches will be confirmed by the SWCs as part of the master planning process for each strategic settlement.</p> <p>Noted. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>Noted. Because the needs are different, the process is also slightly different to reflect this. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be</p>

	adjacent to Cat.4 villages, or in the open countryside.	suitable, in certain circumstances, for Traveller pitches.
Wick PC	<p>Q1 Yes, but 'suitable sites' need to be agreed with the local community, and not allowed in open countryside or in Cat.4 villages.</p> <p>Q2 Transit sites, if needed, should be distributed across the region close to major traffic arteries. Wychavon already has all the Transit Sites.</p> <p>Q7 The allocation of pitches on these sites should be specified and not exceeded.</p> <p>Q8 We believe that no Traveller or Travelling Showpeople sites should be located adjacent to Cat.4 villages or in open countryside. This limitation should also apply to extensions to existing sites.</p> <p>Q11 We believe that the travelling community should be subject to the same Planning Laws as the settled community. No new sites or extensions to existing sites should take place adjacent to Cat.4 villages, or in the open countryside.</p>	<p>Noted. Consultation periods allow for input from the local community. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>Noted. Each site will be assessed on its own individual merits. The SWCs cannot control how many sites are submitted for each authority.</p> <p>Noted. They number of pitches will be confirmed by the SWCs as part of the master planning process for each strategic settlement.</p> <p>Noted. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>Noted. Because the needs are different, the process is also slightly different to reflect this. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p>
Forest of Dean	Note intention to provide an allocations document. No further comments to make.	Noted.
Resident	Objects to Hughes Barn site: 1. The site shares a narrow	The comments and concerns raised are noted. Hughes Barn



	<p>entrance which leads to a very busy B road with a 50mph speed limit. This road carries vast amounts of traffic including many lorries. To have even more large vehicles towing caravans etc trying to pull out and into this entrance from the busy road is not going to be safe for anyone using that stretch of road. There is only a narrow green space left between Badsey and Bretforton villages. To have yet more infill of dwellings even if temporary ones will undermine the delineation of the two villages. Creeping infill is surely to be avoided.</p>	<p>is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p>
Gloucestershire County Council	No comments.	Noted
Great Comberton PC	<p>Concerned to see that the majority of the proposed allocation falls to Wychavon which already has many more than its fair share of traveller sites and feel more should be placed in the other districts. Once a full allocation is in place we would like to see much firmer action on illegal occupations and on the unauthorised sites including unauthorised expansion of existing sites.</p>	<p>Noted. The SWCs cannot control how many sites are suggested by landowners in each authority. It can only assess each site as it's proposed based on its individual merits. Whereas this may not represent a completely even final allocation split between authorities, it will be a reflection of the suitability of each site based on its individual merits.</p>
Hagley PC	No comment	Noted
Himbleton PC	No comment	Noted
Highways England	<p>Reviewed the proposed site allocations and note that none lie within close proximity to the Strategic Road Network. Furthermore, the number of additional pitches at a single site is no more than 6. In view of this we consider that it is unlikely that there will be a significant impact on the SRN as a result of the proposals.</p>	Noted
Hill & Moor PC	Q1 Does not agree with this approach.	Noted. The SWCs cannot control unauthorised encampments, they can only

	<p>Transit pitches should be provided in a proper manner. Unauthorised encampments harm relationships between the settled community and the traveller community – policies should be aiming to bring communities together not exacerbate tensions. In addition, the ‘Toleration policy’ is often not the approach taken in practice.</p> <p>Q7 Objects to the proposal for the new settlement at Throckmorton Airfield and does not support the addition of a traveller site at the location.</p> <p>Q8 Does not support this approach for Category 2 or Category 3 settlements where there are likely to be few services to walk to. The assumption that people will walk if the settlement is 800m away from services is simplistic, it also depends on very many other things including the walking route, what they are doing, what else they have to do and how much time they have to do it. Some people will walk more than 800m some will not walk any distance at all.</p> <p>Given the difficulty in finding suitable sites, the restriction of 800m should be discontinued.</p>	<p>use the powers that are available to them to control and enforce against them, where necessary and suitable.</p> <p>Noted.</p> <p>Noted. Each site and its accessibility to key services has been assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a town, cat 1, 2 or 3 village has been dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to community services. It is suggested that sites should be 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 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from</p>
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	<p>Q9 If landowners will not provide land for traveller settlements, the County Council should look to providing more council run sites.</p> <p>Q11 There should be more provision for traveller sites in Malvern Hills District.</p>	<p>the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling.</p> <p>The County Council continues to run its own sites but does not propose new ones.</p> <p>There have been more sites submitted in Wychavon than Malvern Hills and Worcester City. The SWCs can't control where sites are submitted from and can only assess each site on their own individual merits.</p>
Historic England	<p>Q7 In principle, yes, subject to historic environment considerations for these areas which we are continuing to work with the SWDP team on as that Plan progresses.</p> <p>Q8 Yes, subject to historic environment considerations.</p>	<p>Noted.</p> <p>Noted.</p>
Ridge & Partners on behalf of Barwood Land	<p>Q7 No:</p> <ul style="list-style-type: none"> <li>-Site assessment is overly restrictive and should not rule out expansions to new or existing sites on distance. Some sites have been dismissed due to their size but could accommodate a lesser amount of pitches than suggested.</li> <li>-Some potentially suitable sites that meet the essential criteria are ruled out due to uncertainty on access, e.g. Main Road, Kempsey and Broomhall Way, Worcester. The extent of the assessment on access is unknown, and it is</li> </ul>	<p>Noted. Each site and its accessibility to key services has been assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a town, cat 1, 2 or 3 village has been dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to community services. It is suggested that sites should be within 2km of a primary school to help encourage children to</p>

	<p>unclear if any other options for access have been considered.</p> <p>-In terms of the suitability of Strategic Allocations, whilst this robust assessment has been taken of the sites submitted in the Call for Sites, this assessment against the 'essential' or 'desirable' criteria has not been undertaken for the Strategic Allocations. As such, it is not clear whether these sites would be suitable to deliver this need.</p> <p>- There needs to be flexibility within the policy to allow for off site provision and / or financial contributions for Strategic Allocations. Furthermore, the need is on a District wide basis, and it is therefore considered that financial contribution should be sought from all major developments and the policy should be re-worded accordingly.</p>	<p>attend school on a regular basis which is in accordance with one of the objectives of the Planning policy for Traveller sites. The 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling. Further information has been submitted on Broomhall Way overcoming the Highway objection in principle. The site is now a suggested allocation. The new settlements are mixed developments and therefore should be capable of meeting the needs of Travellers as well as the settled community – the sites need to be identified to ensure that this happens. Off-site financial contributions are not considered an appropriate alternative to on-site provision.</p>
Kempsey PC	<p>Q1 The approach is agreed in principle but only if site identification is subject to further public consultation.</p> <p>Q2 Toleration policy should not permit trespass or unauthorised access onto private or public land.</p>	<p>Noted. There will be a further Regulation 19 Consultation.</p> <p>Noted.</p>

	<p>Q7 Yes. However, suitable sites should be identified within the new settlements as soon as possible and thereafter not be allowed to be negotiated out by developers and replaced by financial contributions.</p> <p>Q8 Yes but exclusions should include Strategic Gaps which have a similar purpose and functions to Green Belts.</p> <p>Q9 Not directly but is considered that effective long term control can only be secured through public ownership and control.</p> <p>Q10 This is a longstanding issue on which there is extensive case history and case law which should provide suitable guidance.</p>	<p>Noted. The ongoing master planning process is aimed at ensuring suitable pitches are identified at an early stage to ensure that the strategic settlements are plan-led.</p> <p>Sites within Significant Gaps have been ruled out.</p> <p>Noted.</p> <p>Noted.</p>
Resident	<p>Objects to The orchard, Knowle Hill: Increasing the number of pitches at The Orchard, Knowle Hill fails to meet the sustainability criteria of the SWDP. The SWDP document states that sites are to be 'sustainable' and 'well integrated with the wider local community'. There is no evidence that either of these criteria will be met.</p> <p>Knowle Hill has no pedestrian walkways; no speed limit; no street lighting; no safe pedestrian crossing of the A64 and no services within 1 kilometre.</p> <p>What measures are going to be put in place to 'increase access to local services and facilities? For example, one would assume with the proposed increase in population and traffic a speed</p>	<p>Noted. Because the needs are different, the process is also slightly different to reflect this. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>The lack of footpath and cycle access from the Traveller site at Knowle Hill is acknowledged but this is not unique to this site. The site is close to the edge of Evesham and therefore car journeys will be short – the site is therefore considered to have reasonable access to services and facilities notwithstanding that the journeys are likely to be made in the car. It would be</p>

	<p>limit on Knowle Hill and a footbridge over the A46 would be a minimum.</p> <p>Changing the nature of the open rural character of Knowle Hill has been used by planners on several occasions to decline planning permission for houses. There is no reason to treat Traveller sites any differently. To do so would be discriminatory. An extra 3 pitches represents a major intensification of population on Knowle Hill.</p> <p>Q.8: Agree with this approach but The Orchard, Knowle Hill is more than 800m from the town or category 1, 2 or 3 settlement by foot or by car.</p>	<p>unreasonable to require a new bridge over the A46 for a scheme of this size. This site now has planning permission for 5 pitches (2 tolerated and 3 new) and consequently no further pitches are proposed for it in the DPD.</p> <p>Noted. Because the needs are different, the process is also slightly different to reflect this. Whereas open Countryside and Cat 4 locations are not suitable for residential development, they can be suitable, in certain circumstances, for Traveller pitches.</p> <p>Each site and its accessibility to key services has been assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a town, cat 1, 2 or 3 village has been dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to community services. It is suggested that sites should be 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 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are</p>
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		<p>relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling.</p>
Resident	<p>Objects to Hughes Barn Site: raised concern about consultation letters; the access track belongs to travellers living on the site and not to the current owner of Hughes Barn. B4035 is very busy with approx. 750 heavy vehicles every day – access is on 50mph section, proposal would increase in probability of accidents; impact on property values; visual impact; concern about sanitary arrangements.</p>	<p>The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p>
Resident	<p>Q4 (The Orchards) The acceptance of 'tolerated sites' calls into question the integrity of the application process. Why should anybody bother with planning permission if a development can be built without permission and legitimised retrospectively by the planning authority, and recommended for extension? This site is effectively in Badsey, being separated by the A46 from Evesham. The school in Badsey is nearer than that noted in Evesham.</p>	<p>In the past there were many tolerated sites that had existed for many years but over time most of these have either been vacated or planning applications have been submitted and granted. The reduced sized site at The Orchards is considered to meet the planning criteria in the DPD and therefore there is an opportunity to regularise the 2 tolerated pitches. Comments regarding separation from Evesham via A46 are noted. This site now has planning permission for 5 pitches (2 tolerated and 3 new) and consequently no further pitches are proposed for it in the DPD.</p>

	<p>Q5 (Blossom Hill) This site is also close to Badsey village which has the nearest school.</p> <p>Q6 (Hughes Barn) This site is adjacent to an existing site, and would represent quadrupling of the size of that site into open countryside and could cause visual intrusion, and noise pollution.</p> <p>Q8 This approach allows for sites to be developed in open countryside where other residential development would not be permitted. Each 'pitch' usually includes a static caravan, a touring caravan and an amenity block. Given that these are sites for permanent use, how are they judged under different conditions to other residential development? The sites could potentially constitute infilling between villages. A green space between settlements does not need to have any official designation to be worth protecting. What is the point of Development Boundaries if sites can be positioned without regard to them? These boundaries were set up in the SWDP after consultation – now they are being ignored by the same planning authority.</p> <p>Q9 Look harder for council land to be utilised, especially brownfield, where the environmental gain would offset the rent reduction.</p>	<p>Noted. This site has now gained planning permission for 4 pitches.</p> <p>The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p> <p>The nature of traveller pitches means that there are circumstances whereby it is acceptable for them to be allocated in lower category villages or open countryside. Development Boundaries can help to limit the number of dwellings and other built development in the open countryside on a speculative basis. The process of the Council allocating traveller sites outside of development boundaries is to ensure that their positioning is plan led. The allocation of residential development as part of the SWDPR is also largely accommodated outside of development boundaries.</p> <p>The SWCs have looked at council owned land and none was considered acceptable.</p> <p>Noted.</p>
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	<p>Q11 This document manages to identify only 4 suitable sites, despite three calls for sites. All 4 are at or adjacent to existing sites. In effect, no new sites have been identified.</p> <p>Three of the four potential sites are in or adjacent to Badsey, despite any difference in postal address. There is nothing in the document about the cumulative effect upon local services.</p> <p>The lack of new sites anywhere other than those previously existing suggests that some evaluation criteria may not be fit for purpose. In particular, the identification of sites in open countryside for permanent sites, where other residential planning permission would not be granted.</p>	<p>There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits. Planning permission for a range of uses may or may not be granted on each parcel of land allocated, but the call for sites process is entirely separate from the planning permission process. The call for sites process is one that is intended to ensure the allocation of traveller sites is plan led. This is exactly the same as the process used for allocating residential and employment development as part of the SWDPR.</p>
Resident	What about Romany people, where are they in this discussion??	The definition of Travellers includes a wide range of groups including Romany people.
National Grid	No comment	Noted
Natural England	No objection to the adoption of any of the proposed sites	Noted
Network Rail	<p>For sites allocated for use in the DPD that are adjacent to the railway boundary the applicant must install a minimum 1.8m high trespass proof fence set back a minimum of 1m from the railway boundary.</p> <p>All works within 10m of the railway would need to be agreed with Network Rail.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result</p>	Noted. None allocated close to railways.

	<p>in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.</p> <p>Any development of land which would increase or change the character of traffic using rail crossings should be refused unless it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated.</p> <p>Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings in the area.</p>	
North Claines PC	No objection to the proposals because there are no proposals which affect our parish.	Noted
Resident	Objects to Hughes Barn: the access is outside of the ownership of Mr Hughes and therefore he has no control over any required alterations to the access junction with the B4085 or to the track leading to the site. The ditch is also outside of the ownership of Mr Hughes.	The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.
Pendock PC	Q1 No. Any sites chosen would need to be subject to additional consultation Q2 Yes Q7 & 8 Yes	Noted.
Resident	Objects to Hillbee Farm: Planning permission has been refused on several occasions and it has been proved that the access is unsuitable and	The concerns raised are noted. In any case, this site is not being proposed for allocation due to highways concerns.

	<p>not safe. The additional caravans sought would leave the site overcrowded. The intensified site would increase the disturbance to neighbours.</p>	
Resident	<p>Objects to Badsey, Aldington and Evesham sites: The second class road, B4035 running through Badsey, carries over 700 HGV journeys every day.</p> <p>The entrance to Aldington off this busy B4035 and the exit onto the Offenham Road are extremely dangerous. Both junctions have been the cause of fatalities over the years.</p> <p>The Vale of Evesham already contains existing sites for travellers and Showpeople. Plenty of rural facilities exist in Malvern Hills area and the outskirts of Worcester. The increasing traffic chaos in and around Evesham, currently aggravated by the Port Street alterations, gives an indication of the problems which already exist in the town. This will only become worse.</p>	<p>Noted. The SWCs have been in consultation with the County Highways Authority who have provided comments on all of the sites and their suitability in regards to highways safety.</p> <p>Noted. Blossom Hill has gained planning permission for an additional 4 pitches.</p> <p>Noted. There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits. Highways matters, including an increase in traffic, have been taken into account and assessed by the local highway authority.</p>
Savills on behalf of St Modwens	<p>No objections to any of the 4 sites proposed which will each make a positive contribution to traveller pitch provision in the South Worcestershire area.</p> <p>No evidence had been provided to demonstrate that the strategic sites were the most appropriate locations for additional traveller sites.</p> <p>Feedback to the GTAA indicates the traveller community's preferred sites are not connected to settlements, either existing or proposed. Travellers have not been involved in the</p>	<p>Noted.</p> <p>The new settlements are mixed developments and therefore should be capable of meeting the needs of Travellers as well as the settled community – the sites need to be identified to ensure that this happens. Discussions with landowners will take place. Off-site financial contributions are not considered an</p>

	<p>discussions on Worcs Parkway and discussions on the location of Traveller sites have not been held with landowners and agents.</p>	<p>appropriate alternative to on-site provision.</p>
<p>Savills on behalf of the Spetchley Estate and Hallam Land Management</p>	<p>It is recommended that the provision of traveller sites at Worcester Parkway needs to be evolved alongside the SWDPR.</p> <p>It is recommended that consideration is given to allocation of traveller sites across more rural parts of South Worcestershire in accordance with demand.</p> <p>Notwithstanding the plans 8 year time horizon upon adoption, the TTS DPD makes reference to the emerging strategic allocations.</p> <p>The Strategic allocations are not yet adopted and the provision of up to two traveller sites at Parkway presents viability and phasing implications. The plan could also prejudice the SWDPR. As such the strategic sites should be removed from the TTS DPD.</p> <p>The SA makes no reference to the emerging strategic allocations and as such these sites have not yet been assessed by the SA process and the traveller sites in these locations cannot therefore be justified.</p> <p>The GTAA presents a contradictory picture of needs and demands of travellers in that 4.6-4.8 of the report states that gypsy and traveller</p>	<p>Discussions with landowners will take place.</p> <p>Ideally Traveller sites should be located so that there is a reasonable access to service and facilities – this is not achieved by sites in more remote rural locations.</p> <p>Noted.</p> <p>The viability of the inclusion of 2 Traveller sites will be tested by the council’s Viability consultants as part of the wider site and SWDP plan-wide viability.</p> <p>Noted. The SA report will consider the policy, suggested sites and allocations. The Travellers DPD was being prepared in-line with the adopted SWDP not the emerging SWDP Review and at the time it was not necessary to look at the new proposed strategic sites.</p> <p>Like the settled community, different Travellers express different opinions. Travellers should have reasonable access to services and facilities and</p>

	<p>households prefer to live in rural and semi rural locations, but 4.8 states that new sites should ideally be close to larger settlements and 800m from a category 1, 2 or 3 settlement. It is recommended that TTS DPD considers the allocation of traveller sites in semi rural and rural locations.</p> <p>The provision of traveller sites at Parkway needs to be evolved alongside the SWDPR to ensure what is required is viable.</p> <p>Q7: What is the justification for why a greater quantum of traveller sites is needed at Parkway compared with Rushwick and Throckmorton?</p> <p>Q8: Reference toward identifying new sites within a “buffer” has the potential to confuse. This should be amended. SWCs should also consider guidance contained in the PPTS encouraging LAs to have regard to provide local environment quality on health and well-being of any travellers.</p> <p>Section 7 of the GTAA provides guidance on the location of new provision in South Worcestershire with 7.15 providing a helpful starting point for site identification. At Parkway, the broad locations identified appear to straddle the M5 corridor which would cause detrimental harm to occupiers. Furthermore, once built out, the land will create an urbanised effect and will no longer provide a rural</p>	<p>sites should be allocated accordingly.</p> <p>The viability of the inclusion of 2 Traveller sites will be tested by the council’s Viability consultants as part of the wider site and SWDP plan-wide viability.</p> <p>Parkway is a much bigger site than the other 2 and is considered to have capacity to accommodate 2 Traveller sites.</p> <p>Noted.</p> <p>The new settlements are mixed developments and therefore should be capable of meeting the needs of Travellers as well as the settled community – the sites need to be identified to ensure that this happens. Discussions with landowners will take place. Potential impacts of, e.g. M5 on future occupiers, will be considered but often can be mitigated against. Travellers should have reasonable access</p>
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	<p>character. The SWCs should consider relocating the site to a more rural area.</p>	<p>to services and facilities and sites should be allocated accordingly.</p>
<p>Stratford-upon-Avon District Council</p>	<p>The flexible approach to the delivery of new sites is acknowledged and supported, through the combination of granting permission for tolerated sites, intensifying and expanding suitable existing sites, allowing for an element of windfalls within the broad locations and requiring provision on new settlements in the emerging Local Plan. This is considered to be a robust and resilient approach to delivering the need within the area. However, the extent to which new settlements will be able to deliver such sites within the 6-10years is questioned given the time it can often take to deliver a new settlement. Further information on how these sites would be delivered in practice would be welcomed in the DPD.</p> <p>It is important that any specific site allocations take into account any cross boundary impacts, for example the impact on the highway network and any environmental implications.</p> <p>It is suggested that it would be helpful for the DPD to include some design principles in relation to new pitches/plots and sites/yards to assist all those in the application process and to ensure that design considerations are given due regards and the necessary on-site information is in place. In particular this could include principles on layout and appearance, health &amp; safety, access, pitch and site</p>	<p>Noted.</p>

	infrastructure requirements, and pitch/plot size.	
The Coal Authority	Legacy of mining in south Worcestershire – therefore should add potential of land stability to essential criteria. (GIS downloadable mapping provided for all Local Authorities).	Noted.
Upton upon Severn Town Council	Objects to the increase in pitches at Hillbee Farm. The site cannot be delivered as the access is not suitable, a matter acknowledged on multiple occasions by Worcestershire County Council Highways in response to planning applications at the site.	The concerns raised are noted. In any case, this site is not being proposed for allocation due to highways concerns.
Worcester Regulatory Service (noise)	No objection to the four proposed sites in terms of road traffic noise adversely impacting future residents.	Noted
Worcester Regulatory Service (Contaminated land and air quality)	No adverse comments to make for either contaminated land or air quality.	Noted
Wyre Piddle PC	<p>Unexplained disparity between number of existing pitches and proposed pitches in Malvern Hills which has much fewer than Wychavon.</p> <p>Suggest check how Harlow Council have successfully prevented unauthorised encampments in their district.</p> <p>Table 3 shows the number of pitches required until 2030. How can you have fractions of pitches?</p> <p>The fact that there are three tolerated sites already shows that the Council is unwilling to carry out any enforcement. The local authorities need to either take action against these sites, either against the travellers or the landowners,</p>	<p>There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits. Noted.</p> <p>Sites are calculated based on local need. Often this calculation does not result in a whole number. Of course, in reality this number will be rounded accordingly.</p> <p>The council takes enforcement of contravention of planning permissions very seriously but may decide not to take enforcement if, e.g. it is likely that planning permission would be approved.</p>

	<p>to force them to remove these encampments.</p> <p>Q2 Transit sites. There should be designated transit sites, or travellers will stop in unsuitable areas e.g. with no rubbish collection and no access to toilets or clean water.</p> <p>Q7. We all need to live somewhere and this does seem to be a fair solution.</p> <p>Q8 Figure 1 to question 8 is incorrect in showing some of the settlements in the wrong category i.e: Lower Moor is shown as category 2 but is actually a category 3 settlement and Drakes Broughton is shown as category 1 but is actually a category 2 settlement. However, the map is far from clear. Whilst you seem to be ensuring that category 1-3 villages and towns have a buffer, there appears to be no such buffer for category 4 settlements, some of which already have a number of sites close to them. The category 4 settlements also require a buffer. There is no integration between travellers and villagers, with the traveller sites close to Wyre Piddle being gated, which leaves no room for integration.</p> <p>Q9 Suggests traveller sites are sited on major housing development sites.</p>	<p>Noted but this may not prevent unauthorised encampments. There is a Joint Protocol For The Management Of Unauthorised Encampments Of Gypsies And Travellers On Local Authority Land In Worcestershire in operation</p> <p>Noted.</p> <p>The updated Village Facilities and Rural Transport Study published in 2019 reassessed Lower Moor as a category 2 village and Drake Broughton as a category 1 village – therefore the information in the PO is correct.</p> <p>The purpose of the map was to identify areas where Traveller sites may be acceptable.</p> <p>Noted. This is not always feasible or practical. Nevertheless, it is proposed to include sites in of each of the three major strategic developments.</p>
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	<p>Q10 - Suggest that timescales for remaining in one place, or one area is established.</p> <p>Q11 Why are Traveller sites not more fairly spaced out across South Worcestershire? Are there plans to locate all traveller sites within certain areas?</p> <p>No confidence in the planning system as policies and designations are changed at the whim of the council.</p> <p>Can you confirm that the preferred sites in the Wychavon district will be the only sites to be used over the next 10 years?</p>	<p>Noted but this is not something that can be delivered through planning control.</p> <p>There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits.</p> <p>Comments noted. The government requires Local plans to be revised regularly and this involves new policies and allocations, e.g. to meet the housing needs of the local community, including Travellers.</p> <p>No. Windfall applications can be submitted and have to be determined – the same is for all types of development, and not just for Travellers.</p>
<b>New Sites suggested:</b>		
William Gallagher OBO Resident	<p>Q7 The number of pitches to be allocated at either of these sites should be recognised as being a very long-term opportunity and therefore not contributing to meeting the need until post 2030 at the earliest. Suggests their site would help meet the identified needs sooner.</p> <p>Resubmitted their site (Land off Broomhall Way, Worcester) with additional evidence regarding the proposed access arrangements.</p>	Noted. Site reassessed because new information submitted.
Resident	Submitted site at Green Lane, Naunton WR8 0PY in Malvern Hills	Noted. Site assessed.

## Comments on the SA

The Coal Authority	Although we have no specific comments to make on the Sustainability Appraisal under consideration, we do however expect that any potential risks posed to proposed site allocations by land instability have been properly considered.	Noted.
Savills on behalf of St Modwens	An Interim Sustainability Appraisal Report for the South Worcestershire Traveller and Travelling Showpeople Site Allocation Development Plan Document was published in May 2021. This does not consider the proposal to meet 'medium term need' (6 to 10 years) via new traveller sites on urban extensions and / or windfall sites. It is clear this medium term need is covered by the DPD (page 4 of the DPD), while the longer term need (11 to 15 years) is not. Therefore, the SA for the DPD should include consideration of the methods proposed for addressing medium term need.	Noted. The SA report will consider the policy, suggested sites and allocations.
<b>Reps Received on Objective</b>		
Resident	Does not agree with the Showmans Guild approach as it may not take into account other council and householder's priorities. The showman's guild should demonstrate how this sector plans to embrace climate change, and the horrors of (nitrogen?) particle pollution in our towns and cities. It is likely their will inevitably a reduction in the participants in this sector - requiring fewer not more plots.	Noted. The SWCs can only assess the needs as they are now. New Traveller development will be encouraged to include renewable energy schemes.

	<p>Agrees that no new transit pitches are required due to impact of climate change legislation and ultra low emissions legislation.</p> <p>Suggests that increasing the number of Pitches at Hillbee Farm by 3 pitches is the best mid-long term option. Believes that Hughes Barn is not suitable for 6 pitches. There will not a requirement for extra pitches at the Strategic Settlements due to the impact of both Climate change and ULEV legislation. Priority over other groups should not just be given.</p>	<p>Noted</p> <p>The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented. Likewise, Hillbee Farm is also not being proposed for allocation due to highways safety concerns. It is intended that all sectors of the community should be catered for at the new settlements, including Travellers.</p>
Charlton Parish Council	<p>Agree with working with Showmans Guild to identify sites, however recommend that no sites be adopted without further consultation with the communities involved.</p> <p>No sites should be allowed in 4A or 4B villages or in open countryside.</p> <p>Due to the number of Tolerated Sites in Wychavon, the number of Transit pitches covered should not be increased with any additional Transit sites should be allocated to either Worcester City or Malvern Hills.</p>	<p>Noted. This consultation is designed to allow for the communities impacted to have their say. The SWCs have written to all residents within close proximity of sites to ensure that local residents are aware of any proposals that may impact them.</p> <p>Noted. The needs of Travellers are different to those of those in residential developments and as such there are circumstances where it is suitable for new pitches in lower category villages and the open countryside.</p> <p>Noted. There have been more sites submitted in Wychavon than Malvern Hills or Worcester City. The SWCs cannot control where sites are submitted from and can only assess each site on its own individual merits.</p>

	<p>It is commonly accepted that Transit Sites should be located close to major transport arteries. e.g. M5 or M42.</p> <p>The statement "around 10 pitches" is not acceptable. A definitive limit on number of pitches should be set for each Traveller site and not exceeded.</p> <p>Any proposed new sites or extensions to existing sites should be subject to full and open consultation with residents of affected settlements before adoption. Also, any proposed new sites or extensions to existing sites should be subject to the same Planning Laws as apply to the settled community.</p>	<p>Noted. County Highways and Highways England have been consulted on the proposals and the SWCs will be guided by their feedback.</p> <p>The policy has been amended to refer to 10 pitches on the new settlement Traveller sites and a maximum of 10 pitches on privately owned sites. Planning permissions granted usually include a condition stating the number of pitches/caravans allowed on the site – but we cannot stop Travellers from submitting applications to alter these numbers.</p> <p>Noted. This consultation is designed to allow for the communities impacted to have their say. The SWCs have written to all residents within close proximity of sites to ensure that local residents are aware of any proposals that may impact them. Nevertheless, there will be a further Reg 19 consultation that will allow residents a further opportunity to submit their comments. The SWCs will be following the correct procedures to ensure that sites are allocated in accordance with relevant up to date planning policy.</p>
Resident	<p>Development of The Orchard has grown over time and now comprises 3 sites each with a park home and wash house. A planning application was made in 2002 to legalise this expansion but this was never approved and as a result there is one legal pitch and two tolerated ones.</p>	<p>Noted. This site now has planning permission for 5 pitches (2 tolerated and 3 new) and consequently no further pitches are proposed for it in the DPD.</p>

	<p>There is no objection to the existing extent of this development.</p> <p>However, objects to the expansion of the site because:</p> <ol style="list-style-type: none"> <li>1. Has concerns as to how nomadic those that live on the site may be. Any future development should be based on general planning policy.</li> <li>2. If The Orchard were allowed to grow to 6 park homes and their out houses the development would be out of all proportion to Knowle Hill and if this development were deemed a Traveller site it will not be subject to the planning and building control constraints. Any further development would reduce the residential amenity of other properties in the area.</li> <li>3. The Orchard is currently not connected to mains sewerage. The nearest sewer is small and has already proved inadequate for the properties currently connected to it.</li> <li>4. The additional traffic created by a further 3 households on this site would have a detrimental effect on the peace and quiet of properties in Knowle Hill.</li> </ol>	
Resident	<p>Agrees with the Showman's Guild approach.</p> <p>Agrees that no new transit pitches are required because of the unauthorised encampment protocol operating across Worcestershire.</p> <p>Doesn't think Hillbee is a suitable location for an</p>	<p>Noted.</p> <p>Noted.</p>

	<p>increased number of pitches because:  There is no safe and suitable vehicle access to the site due to a deficiency in the visibility splay (development of the site has been refused a number of times for this reason).  No safe and suitable walking route to the nearest bus stop or local amenities.  Too close to an established and settled community.  Impact on neighbouring properties.</p> <p>Traveller status has not been sufficiently proven.  Agrees that the number of pitches at Orchard, Knowle Hill, Blossom Hill and Hughes Barn can be increased as well as each of the Strategic Settlements.</p> <p>Does not agree with using Areas of Outstanding Natural Beauty as areas identified as broad locations of growth.</p> <p>Evidence must be requested and provided in order to prove traveller status. For example, if an individual has a permanent residency then this suggests they no longer or have never lived a true nomadic lifestyle.</p>	<p>Hillbee Farm is not being proposed for allocation on Highways Safety grounds.</p> <p>Support noted for The Orchards at Knowle Hill which now has planning permission. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p> <p>It is not intended that any of the sites will be located within the AONB.</p> <p>Comments noted.</p>
Resident	<p>Agreed with Showmans Guild approach but with the emphasis on suitability of sites and as long as they fulfil the criteria accurately.  Hillbee Farm fails to fulfil the following criteria:  A safe and convenient access to the highway network. This site's access has been the subject of much scrutiny over this matter due to it's</p>	<p>The comments and concerns are noted. Hillbee Farm is not being suggested for allocation on Highways safety grounds.</p>

	<p>dangerous position and insufficient visual splay. This remains so regardless of whether the access remains where it is or is moved. Either way the visual splay fails to be sufficient and doesn't believe this can be mitigated at all. In addition, last year the site was put forward for formal planning assessment (application 20/00173) which was refused because it failed to address road safety issues or demonstrate a safe and suitable access. Therefore strongly opposes the proposed additional pitches on the grounds of safety.</p>	
Resident	<p>Hillbee Farm has an access with very poor visibility, and has failed a number of planning applications specifically on these grounds. There is also no footpath. If a safe access was possible to achieve, then the site owners would have made alterations, as they are well aware of the danger to themselves and other road users.</p> <p>There is a requirement to include sites within the Malvern Hills area, and therefore suggests that sites near the A4440, South Worcester, and new developments in the Rushwick area should be included in the SWDPR.</p> <p>The interpretation of having pitches within 800 of a town or cat 1/2/3 village is vague and makes no attempt to include site access, and the 800m rule does not give any indication on footpath availability, and</p>	<p>Hillbee Farm is not considered suitable for allocation on to Highways safety grounds.</p> <p>The Rushwick Strategic Settlement will be allocating additional traveller pitches.</p> <p>Each site and its accessibility to key services has been assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a</p>

	<p>distance to shops, doctors, schools and buses.</p> <p>Newlands, Evesham Road, was excluded even though it has a public footpath providing access to services within Norton. It was excluded because it was 820m from Evesham.</p> <p>The proposed sites do not meet the target for Traveller Site allocation and some sites have therefore been excluded that should not have been and there are therefore inconsistencies. Newlands</p>	<p>town, cat 1, 2 or 3 village has been dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to community services. It is suggested that sites should be 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 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling.</p> <p>No safe access could be provided for Newlands, Evesham</p> <p>Comments noted. Following site assessment, it was considered that Newlands Evesham Road &amp; Duffledown Farm, Wyre Piddle, are not suitable for allocation. Likewise, Hillbee Farm is also not considered suitable for</p>
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	Evesham Road, Land off Broomhall Way, & Duffledow Farm Wyre Piddle, could have all been included.	allocation on to Highways safety grounds.
Resident	<p>The Showmans Guild approach is good, but what do existing residents have?</p> <p>If transit pitches are not required, the new sites (and older sites) will be permanent. Sites are permanent and therefore residents ought to be subject to usual council residential rules.</p> <p>Objects to all sites around Badsey and Aldington, Hillbee is a better option. Agrees that each of the new strategic settlements should accommodate growth.</p> <p>Strongly objects to an increase in the number of pitches at Blossom Hill. The village has pitches at both ends and the village and is in danger of becoming overwhelmed. More pitches at Blossom Hill will disturb the community. Aldington has lived in relative harmony with the sites for a long time, but this would be a step too far.</p> <p>Questions why travelling people are thought to be without transport to access services if the nomadic way of life is actually the criteria for the sites?</p> <p>In Aldington, pitches don't seem to be subject to heritage orders. One pitch doesn't seem to mean one building.</p>	<p>Noted. This DPD process will help find new sites to provide accommodation for travellers.</p> <p>Noted. Traveller sites will be subject to planning policy that is relevant to travellers.</p> <p>Noted. The strategic settlements will accommodate growth and each of the sites in Badsey and Aldington as well as Hillbee have been subject to rigorous site assessments to evaluate their suitability.</p> <p>The comments and concerns are noted. Blossom Hill has now gained planning permission for 4 more pitches.</p>
Resident	Agrees with the Showman Guild approach but doesn't believe this should be a shortcut to the usual planning process.	Noted – it is not a shortcut to the usual planning process.

	<p>In regards to Hillbee, objects on two grounds:  Firstly, access is unsuitable (pedestrian and visibility splays for vehicles) - this has been shown through planning applications. This proposal cannot be delivered on access grounds and is thus unsuitable. Recognising the proposed site need only be considered technically possible. A technical survey has been commissioned to prove that access is not possible to this site. To make access safe it would be necessary to move a lot of earth, cut back vegetation and engineer significant retention to cut back verges and a 250m footpath constructed. Fears that intensified use of this site will have significant noise and nuisance impacts that cannot be mitigated. Whilst nearby properties doesn't meet the definition of a settled community, they would be massively impacted by the proposals.</p> <p>Feels that it is necessary to consider actual services in the Category 1,2 or 3 settlement and thus judge each on it's merits rather than as a tick box 800m exercise. It seem reasonable that travelling people have access to schools, shops and doctors as well as just other people.</p>	<p>The comments and concerns are noted. Hillbee is not being proposed as an allocation on Highways Safety grounds.</p> <p>Each site and its accessibility to key services has been assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a town, cat 1, 2 or 3 village was dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to services. It is suggested that sites should be within 2km of a primary school to help encourage children to</p>
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	<p>People who have stayed in one area for a long period can not be considered to be nomadic. Thus property ownership and occupation is often a long term indicator of an intent to cease a nomadic habit of life. On the other hand possession of equipment (caravans, vehicles that can tow etc) suggests a stronger intent to continue a nomadic habit of life.</p>	<p>attend school on a regular basis which is in accordance with one of the objectives of the Planning policy for Traveller sites. The 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling.</p> <p>Comments noted. It is recognised that this is a grey area but often at least one member of the household still travels – e.g. for work.</p>
Resident	<p>It is wrong to seek to develop unsafe and unsuitable sites in order to meet notional targets. The site at Hillbee has been denied planning as a result of the access and egress failing to meet safe visibility standards and this has also been identified by Worcestershire Highways and highways consultants.</p> <p>Additionally the proximity of amenities are all over the recommended 800m from</p>	<p>The comments and concerns are noted. Hillbee is not being proposed as an allocation on Highways Safety grounds.</p> <p>Each site and its accessibility to key services has been</p>

	<p>Hillbee and would involve walking on a busy road without lighting or pavement. This makes the location unsustainable in the context of the NPPF.</p> <p>Malvern Hills Authority Area is under-provisioned for traveller sites and exposed to challenge should the SWDP review fail. Serious consideration should be given to sites bordering South Worcester, by the A440 and new developments in the Rushwick area. Newlands, Evesham Road should be considered in lieu of Hillbee as it has a public</p>	<p>assessed on its individual merits. Following an Advisory meeting with the Planning Inspectorate in October 2021 the requirement for allocated sites to be within 800m of a town, cat 1, 2 or 3 village was dropped because it was too prescriptive. Nevertheless, the south Worcestershire Councils consider that it is helpful to be able to assess a sites accessibility to services. It is suggested that sites should be 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 2km comes from the Institute of Highways and Transportation Guidelines for Providing Journeys on Foot (2000). This will help to ensure allocated Traveller sites are relatively close to primary schools to enable children to access school even if the children from the sites are likely to be driven to and from the school, rather than walk or cycle, due to the poorer quality footpath links available in rural areas. It will help avoid the allocation of Traveller sites in more remote locations which may hinder children's access to schooling.</p> <p>There have been more sites submitted in Wychavon than in Malvern Hills and Worcester City. The SWCs cannot control this and can only assess the sites on their individual merits.</p>
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	<p>footpath and is only 820m from amenities in Norton.</p> <p>The exclusion of persons who use the site as a permanent business address would seem to be a logical requirement.</p>	
<b><u>Worcestershire County Council</u></b>		
Hillbee Farm	<p>WCC have highways concerns regarding the site as evidenced in 20/00173/FUL. The site would need appropriate visibility splays on both sides of the entrance onto the A4104. It is not considered that the 153m splay needed can be achieved.</p> <p>WCC Highways would object to the use of this site based on existing junction arrangements due to highways safety. A possible solution would be to relocate the access 20m to the west.</p> <p>There is no footpath access to nearby bus stops, services, schools or health services and no direct links to Upton meaning most trips would be made by private vehicle and is not suitable for young or inexperienced cyclists. Hence WCC Highways questions the suitability of the site in terms of accessibility and sustainability.</p>	The comments and concerns are noted. Hillbee is not being proposed as an allocation on Highways Safety grounds.
The Orchard, Knowle Hill	<p>Existing visibility splays appear acceptable on Badsey Lane and the junction with the private lane can accommodate additional traffic. Vehicle access is also possible onto Broadway Road.</p> <p>The site does not offer nearby footpathed access to schools, shops or other services.</p> <p>Although close to Evesham, WCC Highways considers the</p>	Noted. This site now has planning permission.

	<p>rural nature of the site a detrimental factor and questions the suitability of the site in terms of being accessible and sustainable as the site would encourage vehicle trips.</p>	
Blossom Hill	<p>It is not clear whether the existing access will be used or new access created. The existing access has inadequate visibility splays but WCC Highways would have no objection to two new pitches as it would have limited impact on Village Street or it's junction with Badsey Road. Alternatively a new access could be created.</p> <p>The site is 900m to a shop, 1.4km to a school and less than 250m to bus stops. WCC Highways considers the site adequate in terms of accessibility and being sustainable.</p>	<p>The comments and concerns are noted. Blossom Hill has now gained planning permission for 4 more pitches.</p>
Hughes Barn	<p>The vehicle access has adequate visibility splays although the access mouth would benefit from widening for towed caravans. The site is 1.6km from a shop, 1.4km to a school and bus stops are within 525m. due to the walking distances to local services, with a lack of lighting, WCC Highways would question the sustainability of the site.</p> <p>This site is close to archaeology considered to be of national significance. Consultation should be undertaken with Wychavon and Malvern Hills Archaeology Officer at application stage.</p>	<p>The comments and concerns raised are noted. Hughes Barn is not being proposed for allocation due to questions as to the ownership of the access road such that mitigation for highways and flooding concerns cannot be implemented.</p>
General	<p>Question 1- Yes Question 2 – The toleration policy is called the Joint</p>	<p>Noted. Agreed – Reference now amended to Joint Protocol for</p>

	<p>Protocol for the Management of Unauthorised Encampments on Local Authority Land in Worcestershire and it offers a consistent, positive and informed approach to enforcement having regard to relevant policy. The Protocol sets out where enforcement action will commence and refers to nuisance, road safety, health and safety, obstruction of access, demonstrable requirement of land for operational use, environmental damage and criminality.</p> <p>Question 3 - No  Question 4 - No  Question 5 - No  Question 6 – No  Question 7 – Yes there is the need for more pitches and the locations are appropriate. 10 pitches would be the maximum number that would be appropriate to manage. Larger sites can often be challenging.</p> <p>Question 8 – Yes  Question 9 – WCC Gypsy Service Team would be happy to be contacted by anyone wishing to create socially rented pitches.</p> <p>10 – Gypsy and Traveller is a recognised ethnic group, not to be determined by whether someone has a nomadic way of life. It is not appropriate to assume that if an individual has ceased to travel that they can be provided with bricks and mortar accommodation as an alternative to a traveller pitch.</p> <p>11- No</p>	<p>the Management of Unauthorised Encampments on Local Authority Land in Worcestershire</p> <p>Noted.  Noted.  Noted.  Noted.  Noted.</p> <p>Noted.  Noted.</p> <p>Noted but for plan-making and decision-taking reference to the definition in Annex 1 of the Planning Policy for Traveller Sites can be made. Although the requirements of Travellers who do not meet this definition should also be considered as part of the plan-making process as required by national planning policy (NPPF).</p> <p>Noted.</p>
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