

5 Assessment of Gypsy, Traveller and Travelling Showpeople Growth Options

5.1 Preface

- 5.1.1 In accordance with the national planning policy for traveller sites⁴⁷, Gypsies and Travellers (G&T) are defined 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"*.
- 5.1.2 Travelling Showpeople (TS) 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"*.
- 5.1.3 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across Sandwell and the wider Black Country. The GTAA (2022) identified a need for 14 pitches and 32 plots in Sandwell.
- 5.1.4 Three options for Gypsy, Traveller and Travelling Showpeople (GTTS) growth have been identified by SMBC (see **Table 5.1**).

Table 5.11: Sandwell Gypsy and Traveller growth options identified by SMBC

Option	Description of Gypsy and Traveller Growth Option	Outcome G&T (pitches)	Outcome TS (plots)
A	Meet a proportion of housing need across part of the plan period (2025-2030) and schedule an early review of the SLP to readdress need across later stages	8	24
B	Meet proportion of local housing need based on supply and small windfalls identified in current SHLAA (2022) and seek contributions from adjacent authorities based on current offers and apportioned using travel to work data (DtC)	10 (SHLAA)	0
C	Meet entire need	14	32

- 5.1.5 **Table 5.2** summarises the likely impacts of each GTTS growth option in relation to the 14 SA Objectives. The text within **section 5.2** sets out the accompanying assessment narrative which explains how each overall impact was identified.

⁴⁷ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 02/06/23]

5.1.6 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by SMBC, as well as expert judgement.

Table 5.22: Impact matrix of the three Gypsy and Traveller growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gypsy and Traveller Growth Option	Cultural heritage	Landscape	Biodiversity, flora, fauna and	Climate change mitigation	Climate change adaptation	Natural resources	Pollution	Waste	Transport and accessibility	Housing	Equality	Health	Economy	Education, skills and training
A	+/-	-	-	+/-	-	-	-	-	-	+	+/-	+/-	+	+/-
B	+/-	-	-	+/-	-	-	-	-	-	-	+/-	+/-	+	+/-
C	+/-	-	-	+/-	-	-	-	-	-	++	+/-	+/-	+	+/-

5.2 Assessment

SA Objective 1 – Cultural Heritage

5.2.1 Within Sandwell there are two Grade I, eight Grade II* and 195 Grade II Listed Buildings, seven SMs, nine CAs and five RPGs. There are also a range of historic character areas and areas of historic townscape / landscape value identified within the borough⁴⁸. Development in close proximity to cultural heritage features has the potential to adversely affect their setting, although given the small overall quanta of growth proposed under the options any adverse effects are likely to be small-scale and localised. However, as the location, site context and proximity to receptors is unknown, the potential impacts of the GTTS growth options on cultural heritage features are uncertain.

⁴⁸ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 18/10/23]

SA Objective 2 – Landscape

- 5.2.2 Although the borough is highly urbanised, it also contains undeveloped areas including Green Belt to the north-east of the borough. The landscape of the borough's Green Belt is largely described as low or low-moderate sensitivity to development although open landscapes within the borough are important for maintaining separation between settlements⁴⁹. One area in Sandwell Valley is described as having moderate-high sensitivity. Within the urban areas, Sandwell's history and industrial legacy provides distinctive character and a sense of local identity. Urban green spaces also provide benefits to the local character.
- 5.2.3 The location and context of the proposed GTTS development is unknown, but it is likely that some development outside of the existing development boundaries would be necessary leading to a potential negative impact on the landscape. Adverse effects on the landscape arising from the introduction of GTTS development would likely be limited in scale, resulting in a change to the local character owing to the introduction of hardstanding and potentially some buildings. It is probable that Option B would have the least impact on the landscape as it proposes the fewest number of pitches/plots at this stage and so would likely be the best performing option, whereas Option C proposes the greatest number of pitches/plots so would likely have the largest impact on the landscape.

SA Objective 3 – Biodiversity, Flora, Fauna and Geodiversity

- 5.2.4 Within Sandwell there are nine LNRs, forming key sections of the ecological network within the SLP area in addition to the numerous SINC and SLINC. There are no SSSIs or NNRs within the borough, but both are present in neighbouring authorities close to the Sandwell Borough boundary. Areas of geological interest include Rowley Hills, Bumble Hole & Warrens Park LNR and Sandwell Valley Country Park. Over 50% of Sandwell's Green Belt land is described as having very high ecological value⁵⁰. Some priority habitats and small areas on ancient woodland are also present in the borough.
- 5.2.5 The locations and site-specific characteristics of the development under the different options are not known. There is potential for a minor negative impact on biodiversity as it is likely that previously undeveloped land may need to be utilised, and development could be situated in proximity to biodiversity and geodiversity designations. There is potential for biodiversity enhancements and net gains to be delivered at the site level, although adverse implications related to the fragmentation of wider ecological networks could still occur. As a result, the three GTTS options are identified as having a potential minor negative impact on biodiversity, with Option B likely having the smallest impact and Option C the largest.

⁴⁹ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 18/10/23]

⁵⁰ EcoRecord (2019) An Ecological evaluation of the Black Country Green Belt. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 18/10/23]

SA Objective 4 – Climate Change Mitigation

- 5.2.6 The two largest sources of emissions in Sandwell are residential buildings and on-road transport, however it is not clear how G&T pitches and TS plots relate to these domestic emissions when compared to 'brick and mortar' dwellings. Sandwell supports a good public transport network which may help to facilitate use of sustainable travel options rather than reliance on private cars. As the location and site details are not currently known it is unclear exactly what impact the pitches/plots would have on climate change and whether any mitigation could be incorporated into the design to reduce carbon emissions; as such, the effects of the options on climate change are uncertain.

SA Objective 5 – Climate Change adaptation

- 5.2.7 As the location of the proposed pitches/plots are not known, the effect they will have on flooding is uncertain. An increase in impermeable ground can lead to increased surface water flooding but this can be mitigated by use of adaptive technologies and incorporation of SUDS, however at this stage these details are not known. Furthermore, careful consideration should be given in terms of the location of proposed GTTS development with respect to existing sources of flooding including Flood Zones 2 and 3, given the particular vulnerability of caravans. Without knowledge of the location of development, a minor negative impact is identified for all three options. Option B proposes the fewest number of pitches/plots and as such may have the smallest impact, Option C would likely have the largest impact as it has the most pitches/plots.

SA Objective 6 – Natural Resources

- 5.2.8 The majority of land within Sandwell is classified as ALC 'urban', although there are small pockets of 'non-agricultural' land and a small amount of Grade 3 and 4 land in the north east of the borough. BMV agricultural land would not be lost if development was within the urban area. There are no MSAs present in Sandwell. The specific location and site context of the Gypsy and Traveller pitches/plots are not known, so the exact impacts the three options will have on natural resources is uncertain. However, given the potential for pitches/plots to require the use of undeveloped land, a minor negative effect on natural resources has been recorded for the three options.

SA Objective 7 – Pollution

- 5.2.9 Sandwell has a borough-wide AQMA, and for several years nitrogen dioxide concentrations have exceeded legal limits in seven monitoring stations across the borough⁵¹. New development within the AQMA may lead to increased pollution levels from increased travel and would potentially expose residents to poor air quality. Soil and water pollution would depend on the nature, scale and location of the developments but there is potential for increased pollution through construction and occupation of the pitches/plots, albeit to a lesser extent for GTTS development than housing or employment development. It is likely that Option B would have the smallest impact on pollution as it proposes the fewest number of pitches/plots so potential pollution during construction and occupation may be less than Options A and C. Option C has the potential to produce the greatest impact in terms of pollution as it proposes the largest number of pitches/plots. Overall, a minor negative impact has been recorded for the three options with regard to pollution.

SA Objective 8 – Waste

- 5.2.10 Whilst it is difficult to estimate exactly how much waste a G&T pitch or TS plot creates it is expected that an increase in the number of pitches/plots would create an increase in the amount of waste produced. As such it is likely that Option B would produce the smallest increase in waste as it has the smallest number of pitches/plots, conversely Option C with the highest number of pitches/plots would likely create the most waste. Options A, B and C have been identified as having a minor negative impact on waste as all options are likely to increase the amount of waste produced, to some extent.

SA Objective 9 – Transport and Accessibility

- 5.2.11 The locations of the proposed pitches/plots are currently not known but it is likely that they would be able to access the existing good public transport network in Sandwell. This public transport network would enable residents to access facilities and amenities within Sandwell in a sustainable manner. However, it is also likely that the introduction of new pitches/plots would increase the number of vehicles on the local road network. Option B proposes the smallest number of pitches/plots and so would likely lead to fewer residents and consequently the least added pressure to the existing public transport networks and the smallest impact on congestion, whereas Option C with the highest number of pitches/plots would likely have the largest impact on public transport infrastructure and congestion. As there is potential for all the options to increase the number of vehicles on the road network and place an additional burden on the public transport network a minor negative impact has been recorded, although these impacts will be dependent on the specific location and capacity of the local road networks.

⁵¹ Sandwell Metropolitan Borough Council (2020) Climate change strategy 2020-2041. Available at: <https://www.sandwell.gov.uk/climate-change-1/climate-change/3#:~:text=In%20recognition%20of%20the%20urgency,carbon%2Dneutral%20borough%20by%202041> [Date accessed: 18/10/23]

SA Objective 10 – Housing

- 5.2.12 The level of growth proposed under Option A would only meet a proportion of the identified GTTS accommodation need, so would have a minor positive impact on provision of housing for the community. Option B could potentially have a minor negative impact as it only meets part of the G&T pitch need it does not provide any TS plots. Option C fulfils all identified needs of the community providing all the required pitches and plots, and as such would have a major positive impact on this SA Objective.

SA Objective 11 – Equality

- 5.2.13 The growth options seek to contribute towards the identified accommodation requirements for GTTS which would be likely to have a positive effect on meeting the accommodation needs of this ethnic group. Option C seeks to meet all identified needs and so may lead to the most benefit in this regard.
- 5.2.14 Deprivation is high across the SLP area, with 36 LSOAs in Sandwell ranked among the 10% most deprived in England⁵². Growth in urban areas could potentially increase social inclusion; however, it could also exacerbate existing inequalities and put increased pressure on existing services. Overall, the location of the pitches/plots are not currently known so their impact on equality is uncertain.

SA Objective 12 – Health

- 5.2.15 Residents in Sandwell generally have good access to health facilities and much of the urban area has good pedestrian and public transport access to healthcare. The location of the proposed GTTS development is unknown, but it is likely that the pitches/plots would have good access to healthcare facilities and be able to utilise the public transport network to access them.
- 5.2.16 Green space makes up 24% of the land use in Sandwell⁵³; as such, it is likely that any GTTS pitches/plots would be able to access green spaces which is important for health and wellbeing. However, it is likely that Option C would place the most pressure on existing green spaces for potential conversion to GTTS use as it has the greatest number of pitches/plots, Option B would likely place the least amount of pressure as it proposes fewer pitches/plots. However, as the location of the pitches/plots is unknown at this time it is uncertain exactly what impacts the three options would have on this SA Objective.

⁵² Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 11/08/23]

⁵³ Sandwell Metropolitan Borough Council Green Space Strategy 2010 – 2020. Available at: <https://www.sandwell.gov.uk/parks-green-spaces/green-spaces> [Date accessed: 18/10/23]

SA Objective 13 – Economy

- 5.2.17 In Sandwell, the highest density of employment locations can be found in the centre and north of the borough and along key transport routes. It is not known where the proposed pitches/plots are to be sited but it is likely that there would be good access to employment opportunities via the public transport network present across the majority of Sandwell. It is likely that all three options could lead to a minor positive impact in terms of access to employment.

SA Objective 14 – Education, Skills and Training

- 5.2.18 The location of the pitches/plots are currently unknown so the proximity to existing schools and education facilities, and as such the level of sustainable accessibility to these services, is uncertain. The Council should seek to ensure that new residents have good access to primary and secondary education for their children, as well as opportunities to develop skills in adulthood.

5.3 Conclusion

- 5.3.1 It is difficult to determine an overall best performing option as the performance of each option depends on the SA Objective under consideration, however, it is possible to identify the best option for specific SA Objectives.
- 5.3.2 It appears Option B performs the best across the most SA Objectives; this is due to Option B having the least number of proposed pitches/plots and so potentially having the smallest impact on some of the environmentally focused SA Objectives. However, a minor negative effect has been identified for Option B for the housing objective as it would only partially meet the Gypsy and Traveller need and provides no Travelling Showperson plots.
- 5.3.3 Option C alone would fulfil all identified needs of the community providing all the required pitches and plots, and as such would have a major positive impact on SA Objective 10 (housing), however since it proposes the highest amount of growth it also would be likely to have the greatest potential for adverse effects.
- 5.3.4 Consequently, Option A could be identified as best performing overall as it provides a proportion of both the Gypsy and Traveller and Travelling Showperson needs but also has potential for less adverse impacts across the other SA Objectives. Although, it should be acknowledged that since Option A proposes to “*schedule an early review of the SLP to readdress need across later stages*”, there is some uncertainty regarding the longer-term effects.

5.4 Selection and Rejection

- 5.4.1 Reflecting on the SA findings (as set out in **section 5.3**) and SMBC’s objectives for the emerging SLP, the Council consider that “*Option B remains the most realistic option however – it delivers the required five-year supply and in the absence of any local demand for additional Travelling Showpeople plots, will have least impact*”.