

Herefordshire Local Plan Travellers' Sites Development Plan Document

Regulation 22 Consultation Statement

February 2018





**Travellers' Sites Development Plan Document
Consultation Statement**

February 2018

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1) Purpose of this Statement

- 1.1 Herefordshire Council has engaged widely and extensively on the preparation of the Travellers' Sites Development Plan Document (DPD). This document brings together and summarises the consultation processes undertaken on the document from August 2014 up until pre-submission publication in November 2017.
- 1.2 This Consultation Statement is one of the Submission Documents required as part of Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2) Herefordshire Council's Statement of Community Involvement (SCI)

- 2.1 The Statement of Community Involvement (SCI) was adopted by the council in January 2017. It sets out the framework which identifies how and when the council will involve the public and stakeholders in the preparation of planning documents. It is a key document within the Local Plan which sets out the long term vision, strategy and objectives which will govern future development and land use in the county.
- 2.2 The preparation of the Travellers' Sites DPD has followed the consultation principles established in the SCI, and in many cases exceeded them. The SCI can be viewed in the Local Plan section of the Herefordshire Council website.

3) Travellers' Sites DPD

- 3.1 This document is one of a number that form the Herefordshire Local Plan. Once adopted, it will be used to guide decisions on applications for new Gypsy and Traveller pitches and plots across the county.
- 3.2 Community consultation has been a key part of the document preparation and a number of communication methods have been used. The council's approach to community engagement has exceeded the level required by national regulations and has allowed the council to better reflect opinion of local communities and individuals.
- 3.3 The table below illustrates the separate stages involved in the preparation of the Travellers' Sites DPD alongside our periods of consultation.

Document Preparation and Consultation Stages	
Consultation Stage	Dates
Issues and Options	August – October 2014
Call for Sites	August – October 2014
Preferred Options	July – September 2016
Call for Sites	July – September 2016
Pre-Submission Draft	November – December 2018

- 3.4 As well as the specific periods of consultation and representation shown in the table in 3.3 the council has been keen to maintain meaningful engagement with local communities and interested parties throughout the document preparation period.

4) Overview of key consultation stages

4.1 **Issues and Options:**

- 4.1.1 At the beginning of the plan making process, a 6 week consultation was undertaken from August to October 2014 inviting people to identify and comment upon the issues that they felt were important around accommodation for Travellers and views on the approach that should be taken.

Appendix A: Consultation Statement Part 1 details the process and results.

4.2 **Preferred Options:**

- 4.2.1 A 6 week consultation was undertaken from 25 July to 19 September 2016. 3 drop-in sessions were held during the consultation.

The consultation requested:

- views upon the identified key issues;
- which issues were considered most important; and
- whether any key issues had been missed

- 4.2.2 A Call for Sites ran over the same period, to offer another opportunity for submission of potential sites.

- 4.2.3 In order to reach a wide range of the community, a number of consultation methods were used in line with the council's adopted Statement of Community Involvement (January 2017).

Appendix B: Consultation Statement Part 2 demonstrates details of the consultation, what representations we received. In addition, this appendix details the council's responses and how the responses have influenced the document.

4.3 **Pre-Submission Draft:**

- 4.3.1 Following the Preferred Options consultation, comments received, updated Gypsy and Traveller Accommodation Assessment (GTAA) and emerging evidence base were analysed. The final GTAA draws upon data from 89 households living on pitches, who completed a survey for the consultants commissioned by the council to carry out the research and write the report. Various additional pieces of work took place, including further technical assessment of potential sites, continued participation in the Gypsy, Roma and Traveller Strategy Group, a seminar to which all council members were invited and a drop in session for Parish Councils. The Pre-Submission Draft DPD was prepared and published for consultation in November 2017.

- 4.3.2 Comments were invited on the soundness of the plan and whether the correct legal processes have been followed.

- 4.3.3 The Pre-Submission Draft paper sets out policies surrounding transit provision, residential pitches and plots for travelling showpeople.

- 4.3.4 A summary of the responses submitted during the publication period has been published with the submission documents and can be viewed on the Travellers' Sites DPD Examination Page on the council website at: www.herefordshire.gov.uk/traveller-sites-consultation

Appendix C: Consultation Statement Part 3 demonstrates how we consulted and published. It includes an analysis of the responses and the council's response.

Appendix A

Herefordshire Local Plan

Travellers' Sites Document



Consultation Statement

Part 1

November 2014



**Herefordshire
Council**

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Appendix 4 - Copy of letter re sustainability appraisal

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1 Introduction

This statement outlines the methods of consultation and engagement undertaken between August and October 2014 on the Travellers' Sites Document, part of the Local Plan for Herefordshire. This period included a specific "Issues and Options Paper" consultation. For detailed analysis of the comments received to the consultation a separate report will be produced entitled 'Travellers Sites Document - Issues and Options Results Report'.

The consultation and engagement has followed the methods outlined within the adopted Herefordshire Statement of Community Involvement (SCI March 2007); a copy of the SCI can be found on the Council's website www.herefordshire.gov.uk/localplan. The production of the document has also followed the regulations set out in the Town and County Planning (Local Planning) (England) Regulations 2012 which sets out how development plan documents should be prepared.

2 Preparing the Issues and Options Paper

The first stage in preparing the Travellers' Sites Document to accompany the emerging Herefordshire Local Plan Core Strategy was the preparation of a Sustainability Appraisal Scoping Report. This was consulted upon for the statutory 5 week period in compliance with the regulations¹. This set the context and the objectives, the scope and the baseline of the appraisal process.

The comments received from the above scoping exercise as well as earlier consultations (namely on emerging Policy H4 of the Local Plan Core Strategy) and the existing evidence base (including Gypsy and Travellers Accommodation Assessments) were reviewed to establish the key issues and possible options and then devise the questions for the Travellers' Sites Document Issues and Options Paper. Issues concerning the accommodation needs of Travellers were set out in section 2, and then various options concerning the location, size and tenure of new sites for Travellers' accommodation (including Gypsies and Travellers and Travelling Showpeople) were set out in sections 5-7. Finally, possible questions to be considered as part of an Equalities Impact Assessment were set out in section 9. Full and up to date information on the evidence base supporting this topic is available on the council's website- see the "evidence base" section on the local plan page.

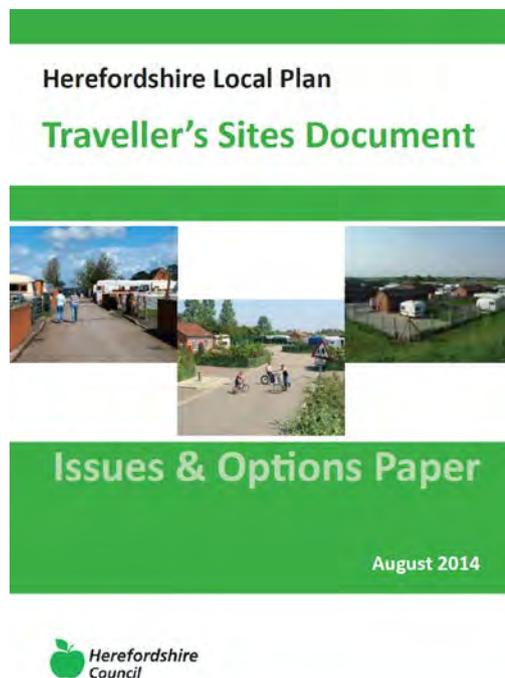
An internal Gypsy and Travellers Accommodation Assessment Working Group and the Gypsy and Traveller Strategy Group, made up of internal and external members were invited to give specialist advice and comments to the issues and options paper via meetings and e-mail.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

A Sustainability Appraisal (SA) report has been prepared for the issues and options stage of the Travellers' Sites Document. The SA is available online on the local plan website. A Habitat Regulations Assessment (HRA) Screening Report will also be prepared in consultation with a number of key bodies as site development proposals progress.

The Travellers' Sites Document Issues and Options Paper was reported to Cabinet Member on 13 August 2014 and approved for consultation. See Figure 1.

Figure 1–Travellers' Sites Document Issues and Options Paper Front Cover



3 How we consulted on the Travellers' Sites Document

A total of 218 parish councils, interested parties, relevant organisations and individuals who had previously expressed an interest in the subject of Travellers' accommodation as part of the development of the Core Strategy were sent a prior notification letter which explained that the consultation on the Travellers' Sites Document was to take place, in accordance with Regulation 18 (1) (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This was sent out at the beginning of August 2014 – see Appendix 1.

The consultation on the actual issues and options paper then took place from 21 August until 2 October 2014, with the same 218 interested parties being sent letters. Although the 2 October 2014 was publicised for responses, comments were received and taken into account after this date – see Appendix 2.

3.1 Questionnaire

The invitation letter to make representations on the Travellers' Sites Document was sent out for the start date of the consultation – 21 August 2014 in accordance with Regulation 18 (1) (b) of the above regulations, 2012. Adjoining authorities and other organisations were sent a specific consultation letter asking about engagement in the “duty to co-operate” process – see Appendix 3. The specific consultation bodies, including English Heritage, Natural England and the Environment Agency and other interested parties were sent a letter regarding representations on the Sustainability Appraisal produced alongside the Travellers' Sites Document in accordance with the Environmental Regulations, 2004 –see Appendix 4. Packs of documents including a series of questions, response forms and sustainability appraisals were distributed to all the libraries within the county and the Council's Info centres. The Travellers' Sites Document, response form and Sustainability Appraisal were also made available online to download.

A total of 31 completed response forms, letters and e-mails were received; the majority from members of the public and parish councils. A copy of the response form is reproduced in Appendix 5.

3.2 Drop-in event

A drop-in event was organised for interested parties at Holmer Church Parish Centre on Tuesday 9th September 2014 between 2pm and 4pm. The drop in event was advertised in the original consultation letter and posters were distributed to existing Traveller sites by the Council's Traveller Liaison Officer and sent to the Travellers Support Group representative for distribution. At the event interested parties were invited to view the issues and options documents, give some initial views on the issues and options and ask planning officers any questions.

4 How we publicised

In line with the adopted SCI, a number of community involvement methods were used to help reach as wide an audience as possible.

4.1 Website

The Council's website contains pages devoted to the Local Plan and the Core Strategy (www.herefordshire.gov.uk/localplan). These pages are regularly updated and contained the Travellers' Sites Issues and Options Paper, response form and sustainability appraisal. Links to the Travellers' Sites Document were included on the Council's Local Plan landing page to enable maximum exposure of the web pages relating to the document. The web address has been printed on all written material and in press releases.

During the time period of the consultation on issues and options, there were 494 hits on the Travellers' Sites Document webpage and 338 of these were unique visits.

4.2 Posters

Posters were produced to advertise the consultation and particularly the drop in event in September. The majority of these were distributed to existing Traveller sites with the intention that they encouraged attendance at the drop-in event. Some were sent to the Hereford Traveller Support Group representative to distribute, with their agreement. A copy of the poster is shown in Figure 2.

Figure 2 – Image of drop-in event poster

Come to a drop in event at Holmer Church Parish Centre on Tuesday 9th September 2014 between 2pm and 4pm.

The Travellers' Sites Document sets out issues and options for looking at meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the county - now and into the future. It will form part of the Local Plan for Herefordshire.

A round of consultation on this document is taking place between Thursday 21st August and Thursday 2nd October 2014.



Information on how to comment is available at www.herefordshire.gov.uk/local-plan and you can view the document online or at Customer Service Centres and Libraries during normal opening hours.

You can ring us on 01432 383034 to obtain a copy.

Or email: ldf@herefordshire.gov.uk.

4.3 Adverts – Hereford Times

An advert was produced for the Hereford Times, which appeared within the 21 August 2014 edition. This helped to advertise the consultation and the drop-in event to a wider audience than just the letters mail-out. The advert is shown in Figure 3.

Figure 3 – Hereford Times advert



**TRAVELLERS' SITES
DOCUMENT CONSULTATION
TO START ON AUGUST 21st 2014**

Herefordshire Local Plan
Traveller's Sites Document

Issues & Options Paper
4 August 2014

The Travellers' Sites Document sets out issues and options for looking at meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople in the county - now and into the future. It will form part of the Local Plan for Herefordshire. A round of consultation on this document is taking place between Thursday 21st August and Thursday 2nd October 2014.

Information on how to comment is available at www.herefordshire.gov.uk/local-plan and you can view the document online or at Customer Service Centres and Libraries during normal opening hours. You can ring us on 01432 383034 to obtain a copy, email ldf@herefordshire.gov.uk or come to a drop in event at Holmer Church Parish Centre on Tuesday 9th September 2014 between 2pm and 4pm.

5 Profile of respondents

The adopted SCI highlights a number of 'groups at risk of exclusion' from the planning process including Gypsies and Travellers. The Understanding Herefordshire report (2014) highlights that the proportion of residents within the county from ethnic minority groups is very low by national and regional comparisons. Although, it is difficult to specifically target individuals, many

groups / associations are included on the Core Strategy database relating to Gypsies and Travellers and will have received letters about the Travellers' Sites Document consultation. A poster advertising the consultation and drop-in event was also distributed to Traveller sites.

Of the 31 responses to the issues and options paper received:

- 2 were from adjoining authorities regarding the duty to co-operate
- 5 were from specific consultation bodies
- 2 were in response to the sustainability appraisal and
- 21 were received from parish councils and members of the public
- 1 response was received from the Traveller Support Group

6 Analysis of comments on the Travellers' Sites Document Issues and Options Paper and "call for sites" and drop-in event

31 separate response forms/letters and emails were received to the questions raised in the consultation documents. A summary of the responses can be seen in a separate report called the 'Travellers' Sites Document Issues and Options Paper Results Report'. As part of this a spreadsheet will be produced for each of the questions within the questionnaire forming part of the Travellers' Sites Document highlighting responses, those given by specific consultees and those relating to the sustainability appraisal. The results report will be made available on the website.

Two responses were received to the "call for sites" request which was carried out as part of the issues and options consultation. These will be assessed as part of the site selection process which forms the next stage in the preparation of the Travellers' Sites Document.

The drop-in event, although not as well attended as hoped, resulted in some useful discussions between Herefordshire Council officers and members of the Traveller community. The general themes raised in these discussions will be reported on in the above results paper and be posted on the website.

7 What happens next?

The results report will contain a column regarding how the consultation and engagement comments have influenced the development of the Travellers' Sites Document. This will be completed once the results of the latest update to the Gypsy and Traveller Accommodation Assessment (GTAA) (which is currently being undertaken by consultants) to identify need for new sites is known, as this will directly affect the progress of the Travellers' Sites Document.

It is also intended to hold a Members Workshop on the issue of finding sites for the Traveller community once the results of the GTAA evidence base are known, to further explore the issues and processes involved.

Actual site identification and selection to meet any identified need for the next 15 years (in accordance with national policy advice set out in “Planning Policy for Travellers Sites”) will then be carried out and any proposed sites presented in a Travellers’ Sites Document – Preferred Options Paper for further consultation and sustainability appraisal.

For up to date information on the progress of the Travellers’ Sites Document, please refer to the Council’s website at www.herefordshire.gov.uk/localplan.

Prepared by: Jane Reeves
Date: November 2014

Appendix 1 – Prior notification of intention to consult letter

**Economy, communities
and corporate**

G Hughes

Our Ref: LDF/Gypsies and Travellers/DPD

Please ask for: Jane Reeves

Direct Line / Extension: (01432) 383034

E-mail: ldf@herefordshire.gov.uk

Date as postmark

Dear Sir/Madam

Travellers' sites document – issues and options paper

A Travellers' Sites Document – Issues and Options Paper is currently being produced and will be consulted upon shortly. A link to the website where you can obtain more information is set out below:

<https://www.herefordshire.gov.uk/local-plan>

The Travellers' Sites Document together with the emerging Core Strategy and other development plan documents will comprise the new style Local Plan for the county. The main purpose of the Travellers' Sites Document is to make site allocations/identify broad locations for search for accommodation for Gypsies, Travellers and Travelling Showpeople. The document is required in order to implement emerging Core Strategy Policy H4 and to meet national policy set out in "Planning Policy for Traveller Sites", March 2012 which requires planning authorities to provide for a deliverable 5 year supply of sites for the accommodation needs of Travellers and further sites/locations for beyond that time. The first stage in preparation of this document is to look at the "key issues" affecting the accommodation needs of the Traveller community and consider "options" of how sites can be identified. The Travellers' Sites Document – Issues and Options Paper will not identify specific sites at this stage.

It is intended that the document will be subject to a consultation period of 6 weeks starting towards the end of August 2014. You will be notified of the start date and documents to look at in due course. Following this consultation the representations received will need to be considered and any proposed sites incorporated into a "Preferred Options" stage. This will then form the basis for submission to the Secretary of State later next year.

Yours faithfully,

Kevin Singleton

Strategic Planning Manager

Appendix 2 – General consultation letter

**Economy, communities
and corporate**

G Hughes

Our Ref: LDF/Gypsies and Travellers/DPD

Please ask for: Jane Reeves

Direct Line / Extension: (01432) 383034

E-mail: ldf@herefordshire.gov.uk

Date as postmark

Dear Sir/Madam

Travellers' sites document – issues and options paper

Herefordshire Council is consulting upon a Travellers' Sites Document – issues and options stage. For the purposes of this document, Travellers are defined as Gypsies, Travellers and Travelling Showpeople. **The consultation will run from 21st August to 2 October 2014.** We are consulting on possible options of where to look for sites to meet Travellers' accommodation needs and detailed aspects of issues such as site size and tenure. No specific sites are considered at this stage. On adoption, the document will form part of the emerging Local Plan for Herefordshire. We welcome your views on this document.

There are 3 ways to comment on the document:

- 1) The preferred method is to make comments by filling in the questionnaire on the council's website www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document saving it as a word document and returning it to ldf@herefordshire.gov.uk. This method is more environmentally friendly and allows us to analyse responses faster.
- 2) You can make comments in hard copy. The questionnaire can be printed from the website and then completed by hand and returned (no stamp required) to: Travellers' Sites Document, Strategic Planning, Herefordshire Council, PO Box 230, Blueschool House, Hereford, HR1 2ZB. Alternatively, if you would like a copy of the questionnaire, please call us on 01432 383034.
- 3) If you do not wish to complete the questionnaire and wish to write a letter, please always make sure you state which specific part/option of the Travellers' Sites Document your comment relates to. This will assist us in analysing your comments.

You can find out more information on the council's website at www.herefordshire.gov.uk/localplan or at any info centre or library in the county. After the consultation, the council will consider all the comments received before producing

a preferred options stage of the document. Please call the strategic planning team on 01432 383034 if you have any queries.

Yours faithfully

Kevin Singleton

Strategic Planning Manager

Appendix 3 – Duty to co-operate letter

Economy, Communities and Corporate Directorate
Geoff Hughes (Director)

Our Ref: Travellers' Sites Document

Please ask for: Jane Reeves

Direct line: (01432) 383034

E-mail: ldf@herefordshire.gov.uk

Date as Postmark

Dear Sir/Madam

Travellers' sites document – issues and options paper: “duty to co-operate

Herefordshire Council is consulting upon a Travellers' Sites Document – issues and options stage. For the purposes of this document, Travellers are defined as Gypsies, Travellers and Travelling Showpeople. **The consultation will run from 21st August to 2 October 2014.** We are consulting on possible options of where to look for sites to meet Travellers' accommodation needs and detailed aspects of issues such as site size and tenure. No specific sites are considered at this stage. On adoption, the document will form part of the emerging Local Plan for Herefordshire. We welcome your views on this document as an adjoining authority.

As part of the “duty to cooperate” in meeting S33A of the 2004 Planning and Compulsory Purchase Act (as amended), we would particularly like to have your comments on the following issues:

1. particular reference to any cross boundary movements/issues you are aware of affecting the Traveller community which could affect transit site provision;
2. please can you confirm at what stage your own authority is at in meeting the national policy requirements set out in Planning Policy for Travellers, 2012 and confirm that you are intending to meet your authorities' Traveller accommodation need within your own administrative boundaries; and
3. whether you would like to take part in further discussions with Herefordshire Council on this topic either as a specific issue group, or as part of a wider cross boundary issues forum.

You can find out more information on the council's website at www.herefordshire.gov.uk/localplan. After the consultation, the council will consider all the comments received before producing a preferred options stage of the document. Please call Jane Reeves in the strategic planning team on 01432 383034 if you have any queries.

Yours faithfully

KEVIN SINGLETON

TEAM LEADER – STRATEGIC PLANNING

Appendix 4 – Sustainability appraisal consultation letter

Economy, Communities and Corporate Directorate
Geoff Hughes (Director)

Our Ref: Travellers' Sites Document
Please ask for: Jane Reeves
Direct line: (01432) 383034
E-mail: ldf@herefordshire.gov.uk

Date as Postmark

Dear Sir/Madam

Sustainability Appraisal of the Travellers' Sites Document – Issues and Options Paper

Herefordshire Council are working towards preparing a new development plan document relating to meeting the accommodation needs of Travellers in the county – a Travellers' Sites Document. In accordance with national and European legislation, a Sustainability Appraisal (SA) has been prepared to accompany the first issues and options stage consultation document.

Attached is a copy of the SA report and you are invited to comment on this document by 25th September 2014.

If you have any questions regarding the contents of the documents please do not hesitate to contact me.

Yours faithfully

KEVIN SINGLETON
TEAM LEADER – STRATEGIC PLANNING

Appendix 5 – Response Form

Response Form for Travellers' Sites Document - Issues and Options Paper

Section 2

- 1) Are there any other key issues affecting accommodation for Travellers that should be addressed in the Travellers' Sites Document?

Section 5

- 2) Of the permanent residential pitch options outlined which one would be the best approach or could a combination of options be used?

- 3) Are there any other realistic and reasonable ways in which future permanent residential pitch requirements may be met? If so, please expand.

- 4) How should formal transit provision be provided for in Herefordshire?
- a) one or two single sites close to a main settlement or
 - b) numerous smaller stopping places along well used main routes or
 - c) additional space for temporary accommodation for people visiting site residents at new permanent Travellers sites identified through the Travellers' Sites Document.

- 5) Are there any other "approach" options for transit site provision?

- 6) Is there a need to provide additional capacity for Travelling Showpeople in the county?

- 7) Can you suggest any sites that you consider suitable for use as Traveller pitches (please refer to the criteria in emerging Core Strategy Policy H4 in Appendix 2 of the Travellers' Sites Document – Issues and Options Paper).

If so, please detail briefly in the box below and submit fuller details using the “call for sites” form reproduced at Appendix 3 of the Travellers' Sites Document and on the website.

- 8) Should council-owned land be considered in any site search?

Section 6

- 9) In terms of the optimum size of new Travellers' sites, should the council:
- a) look to allocate larger permanent sites of say not more than 10 pitches? Or
 - b) do you consider that all permanent residential sites should generally be small e.g. not more than 1 or 2 pitches?

- 10) Which option for providing for Travellers' affordable accommodation needs do you consider is the best approach?

Section 7

- 11) Do you think all the detailed policy considerations relating to Travellers' sites development listed in section 7 are the right ones?

- 12) Are there any other considerations that need to be identified in section 7?

Section 8

- 13) In relation to delivery, should the council or a registered provider be responsible for acquiring and managing the required level of pitch provision themselves and if so, how should this be funded?

- 14) To what extent is it reasonable and appropriate to rely on Travellers delivering the required level of pitch provision through acquiring their own private sites through the planning system?

- 15) How realistic is it to expect the development industry to provide sites as part of larger residential developments? How should we define “larger” in terms of defining a threshold to when such a policy would apply?

Section 9

- 16) Have we identified the main equality issues in the proposed Equalities Impact Assessment outlined above?

- 17) Do you have any other suggestions to produce a robust Equalities Impact Assessment or to assist in monitoring the outcome of the Travellers’ Sites Document e.g. data sources?

Contact details for acknowledgement

Name

Organisation

Address

E-mail address

LDF Number

(if known)

Thank you for completing this questionnaire. Please return to:

Strategic Planning

Blueschool House

Blueschool Street

Hereford

HR1 2ZB

Or by email to: ldf@herefordshire.gov.uk

The closing date for the consultation is midnight on 2 October 2014.

Appendix B

Herefordshire Local Plan Travellers' Sites Development Plan Document

Consultation Statement

November 2017



Travellers' Sites DPD Preferred Options Consultation Statement

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1.0 Introduction

1.1 The purpose of this document is to explain how the council has complied with its Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the arrangement of this consultation.

1.2 This statement sets out the methods Herefordshire Council has used to engage with both stakeholders and the community in the preparation of the Travellers' Sites Development Plan Document between 25 July and 19 September 2016.

1.3 It details the following information for consultation on the Preferred Options stage of the Development Plan Document, which when adopted will become part of the Herefordshire Local Plan.

- Which bodies and persons were invited to make representations
- How those bodies and persons were invited to make representations
- How information was made available to be viewed
- A summary of the main issues raised through representations
- How those issues have been addressed in the Development Plan Document

1.4 The following table shows the different stages of preparation and consultation so far for the Travellers' Sites Development Plan Document.

Date	Stage
18 June to 23 July 2014	Sustainability Appraisal Scoping Report – 5 week consultation
August to October 2014	Call for Sites
21 August to 2 October 2014	Issues and Options Paper – 6 week consultation
17 December 2015 to 14 February 2016	Call for Sites
25 July to 19 September 2016	<ul style="list-style-type: none">• Preferred Options Paper – 8 week consultation.• Sustainability Appraisal and Habitats Regulation Assessment – 8 week consultation• Further Call for Sites

2.0 Preparation of the Preferred Options Document

- 2.1 The Preferred Options Consultation Document is a stage in the preparation of the Travellers Sites Development Plan Document (DPD) The DPD will form part of the Herefordshire Local Plan. The purpose of the consultation was to:
- explain the background to why we need to find space for more pitches and plots for travellers;
 - set out where new authorised traveller sites may be located in the County;
 - invite comments on the suitability of these sites and
 - invite suggestions as to what issues should be covered by new policies.
- 2.2 The preferred options consultation document has been prepared in the context of the National Planning Policy Framework (2012) and the Planning Policy for Traveller Sites (August 2015). It is informed by the Herefordshire Gypsy and Traveller Accommodation Assessment (November 2015) which forms part of the evidence base and was prepared by an independent consultation
- 2.3 The findings of the Issues and Options Consultation that took place in 2014 also informed the preparation of the preferred options document.

3.0 Consultation Methodology

- 3.1 The council has an extensive consultation database which includes individual residents, developers, businesses based across the county, parish councils, community and voluntary groups, infrastructure providers, neighbouring authorities, government agencies and elected members.
- 3.2 Consultation with stakeholders, the local settled community and the local Gypsy and Traveller community is an essential part of the plan making process. The council has used a range of methods to engage with all potentially interested parties, in order to ensure that all have the opportunity to make a representation.
- 3.3 The purpose of the consultation was to invite views on the proposed new and extended sites detailed in the draft document, the Gypsy and Traveller accommodation assessment that sets out the number of pitches required, the use of transit pitches, as well as the Sustainability Appraisal and Habitat Regulations Assessment Reports.
- 3.4 Stakeholders and local community members have been informed by email, in writing or face-to-face about ways to get involved in the consultation. A variety of methods to respond were given, both on and offline in order to reach the broadest audience possible.
- 3.5 The following approaches have been undertaken:

- Direct mailing and emailing to interested contacts on the database.
- Circulation of hard copy information to Gypsy and Traveller communities living on both local authority sites and private sites via Council Officers including face-to-face discussion
- Information made available at libraries and information centres across Herefordshire.
- Press releases sent to media across Herefordshire
- Posters displayed on parish notice boards across the county
- Social Media
- Cabinet Members' newsletter
- The Council's website
- Drop-in sessions at key destinations
- Work with Herefordshire Traveller Support to raise awareness amongst the community.

4.0 The Consultation

- 4.1 The Council published the draft Travellers' Sites Development Plan Document for consultation from 25 July to 19 September 2016.
- 4.2 The document set out the preferred options for sites to help meet the need for Gypsy and Traveller residential and temporary pitches and Travelling Showpeople plots. The specific requirements have been identified through research commissioned by the council to produce the Gypsy and Traveller Accommodation Assessment. The total pitch and plot numbers in the report are intended to meet the need up until 2031. However the identified sites included in the consultation document refer specifically to the first 5 years of the plan period.
- 4.3 Six hundred and twenty seven letters and one thousand and ninety four emails were sent to Herefordshire Parish Councils, specified consultees, all those who had registered interest earlier in the preparation of the document, stakeholders, neighbouring authorities, prescribed bodies agents and land owners notifying them of the details and inviting them to take part in the consultation.

- 4.4 An overview of specified consultees and organisations written to can be found in Appendix 1 of this document.
- 4.5 The correspondence sent included an overview of the purpose of the final policy document, details of where to find all the gathered evidence and background information and how to make a representation either online or on a printed paper copy.
- 4.6 The following documentation was made available to download on the dedicated webpage www.herefordshire.gov.uk/traveller-sites-consultation and in hard copy at all eleven libraries and information centres across the county.
- Preferred Options Development Plan Document
 - Sustainability Appraisal Report
 - Habitat Regulations Assessment Report
 - Frequently Asked Questions sheet
 - Questionnaire
 - Diversity Monitoring questionnaire
 - Call for Sites Submission form
- 4.7 The questionnaire made reference to the main individual aspects of the draft document, asking a specific question in relation to each, as well as inviting further comment.
- 4.8 Each site listed had a question relating to its suitability and if not deemed suitable by the consultee, it included an invitation to make an alternative suggestion with reference to the call for sites form.
- 4.9 The Council website featured the consultation in the 'New and Featured' pages section on the homepage. As well as this, the consultation was also publicised through the Council Facebook page and Twitter feed, with regular updates and reminders about where to find more information and invitations to come along to the drop-in sessions.

4.10 The following table details each method used to distribute information:

Method	Date
<p>Email</p> <p>Specified statutory consultees, Gypsy and Traveller support groups, previous Gypsy and Traveller contacts, parish council clerks & neighbouring authorities</p> <p>It was recognised that not all parish councils would meet within the consultation period. Therefore representations received from parishes following the close of the consultation were accepted.</p>	<p>Notification of consultation</p> <p>Sent Friday 22 July</p> <p>Reminder sent part way through consultation</p>
<p>Letter</p> <p>As above to contacts that have not provided an email address.</p> <p>Members of Parliament</p>	<p>Notification of consultation</p> <p>Sent Friday 22 July</p>
<p>Facebook</p>	<p>Notification of consultation start posted on page with direct link to web page followed by regular updates throughout</p>
<p>Twitter</p>	<p>Notification of consultation start on page with direct link to web page followed by regular updates throughout</p>
<p>Press release announcing the consultation start and finish dates as well as a brief explanation about the document and information on where to find out more</p>	<p>Sent 21 July to:</p> <ul style="list-style-type: none"> • Major County media • Travellers Times • Friends, Families & Travellers • The Traveller Movement • Traveller Space
<p>Website</p>	<p>Featured on HCC newsreel throughout consultation with direct link to consultation page</p>
<p>Radio</p>	<p>Press release sent to local stations</p>
<p>Council Members' Newsletter</p>	<p>Information sent for inclusion in weekly newsletter. Sent Friday 22 July (Featured in newsletter Wednesdays 27 July)</p>
<p>Councillors for parishes with a site identified in their administrative area</p>	<p>Sent personal email with detailed information sent Friday 22 July</p>
<p>Work with Herefordshire Traveller Support to raise awareness amongst community</p>	<p>Notification and key information sent prior to consultation start Friday 22 July</p>
<p>Paper copies made available at information points / libraries across the county</p>	<p>Posted to each with instructions Friday 22 July. Followed up to ensure information was on display and address any queries from staff.</p>

Method	Date
Face to face discussion with Traveller community on local authority sites	Carried out by Community Wellbeing and licensing officers throughout consultation
Drop in sessions at key destinations	Holmer Church Parish Hall – 5 Sept Larruperz Centre, Ross on Wye – 8 Sept Leominster Community Centre – 12 Sept

As well as on the Herefordshire Council website and social media, the consultation was featured by Hereford Times, Ledbury Reporter and Ross Gazette, Worcester News, The CLA, Friends, Families and Travellers, and Travellers' Times.

In addition to these events a parish council drop in session was held on February 6 2017 to provide further information to parish councils on the proposals.

5.0 Responses to the Consultation

5.1 One hundred and forty three responses were received, of which one hundred and five were via the consultation page online. Among the contributors were:

- Local Ward Members
- Parish and Town Councils and Councillors
- Neighbouring Authorities
- National Federation of Gypsy Liaison Groups
- Preservation of Rural Beauty
- NLP Planning
- Hereford Enterprise Zone
- Network Rail
- Leominster Civic Society
- Mercia Waste Management
- Welsh Water
- Historic England
- Bourne Leisure
- Petition of 94 small businesses on Southern Ave, Leominster
- Various local business owners
- Individual residents

6.0 Summary of changes made to the DPD following consultation

6.1 A summary of the responses can be found in Appendix 5. The responses included recurring themes which were used in response to more than one of the questions. Not all of the representations were directly related to land use planning issues e.g. frequent comments were made that respondents could

not understand the need to provide any pitches or the preference to live on pitches rather than in houses. The following paragraphs set out how other representations have been taken into account based on key themes and individual site by site basis. Not all the sites that were included in the preferred options have been taken forward into the pre-submission draft, mainly because of the reduced need for new pitches identified in the GTAA 2017 update. The sites that have been included each have a related policy which addresses key comments raised during the consultation stage. Furthermore the two general policies relating to Traveller Pitches and Traveling show people plots have incorporated the findings of both the public consultation and the sustainability appraisal.

6.2 *The number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople*

6.3 There was disagreement with the conclusions of the GTAA. Of those that disagreed, the majority thought the figures were too high; although some objectors felt that they were not high enough and therefore did not cater for the needs of the county's traveller community.

6.4 The Council commissioned an update to the GTAA in July 2017 in order to provide a more up to date evidence base for the preparation of the plan. This updated GTAA provided a revised evidence base on which the pre-submission document is based. This update has considered two types of need in relation to the PPTS definition and that relating to cultural /ethnic need. This addresses those representations that questioned the validity of the GTAA in relation to the publication of the revised Planning Policy for Traveller Sites in August 2015.

6.5 *Temporary Stopping Places*

6.6 The principle of providing a temporary stop over place has been retained in the pre-submission plan although it now includes one site for this purpose. There was support for this type of provision from a number of respondents; in particular West Mercia Police have reiterated the need for this to enable them to exercise their powers to address the issue. It is considered that such a site will be for the benefit of both travellers and the local community. The majority who were not in favour were concerned about the management and policing of the temporary sites. Additionally some were against such provision because of past experiences following encampments. It is believed that by providing a site with adequate sanitation and waste disposal facilitates that this will help address some of the issues raised by respondents. It was suggested by one respondent that a transit site with permanent facilities should be provided instead of a temporary stopping place. Consideration has previously been given to this but the multi-agency Herefordshire Gypsy Roma

Traveller Strategy Group favoured the latter approach and there was no new evidence to change that approach.

6.7 *Length of stay on Temporary Stopping Place*

6.8 A question was asked about how long individual groups of travellers should be allowed to stay on these sites. There was a mixed response to this with some respondents stating that it should be shorter and others stating that a month would be a reasonable time. It is considered that a good approach to this is to decide on a case by case basis as part of the management of the site using examples of good practice from elsewhere in the country, in particular the negotiated stopping approach adopted in Leeds.

6.9 *Suggestions received of other sites for temporary stopping places:*

- Bringsty Common - However no specific site was identified. It is large area and it is not clear from the limited information what is being suggested. Being Common Land there are a number of restrictions that would apply to prevent such use
- Council car parks; these are often where the unauthorised encampments take place and it is not considered to be a suitable dual use. The council is not aware of any surplus car parks for this use.
- Junction of the A49 and the Monmouth road below the Kingsthorpe bus shelter This is an area of common land in private ownership
- Land adjacent to a site in Much Birch along A49. It is assumed that the respondent is referring to an existing private residential site in the area described. The adjoining land is in private ownership and has not been submitted as part of the call for sites proposal
- Suggest a purpose built site within the construction of the new relief road. The route of the Hereford relief road is not defined and therefore it would not be possible to include such an option at this stage.
- The old warehouse site past the cattle market by Labels roundabout. There are no available sites in this location.

6.10 *The identification of Travelling Show people sites.*

6.11 There was a mixed response to this. Many felt that there was no need for such sites. However the 2015 and 2017 GTAs identify a requirement up to 2031. Two sites were suggested as having potential for this purpose as follows:

- Land at Jays Green / Old Council Yard – This is no longer in ownership of the council and is not available for this use.

6.12 Following consultation the Council has engaged with representatives of the regional office of the Showmans Guild. An agreed way forward in the absence of allocated sites was to include an enabling policy for such sites to come forward based on the Guild's model planning policy.

6.13 *Temporary Stopping Place Broadmeadow Yard, Ross-on-Wye.*

6.14 There were a number of site specific comments about this site e.g. being too central, impact on highways, local businesses and tourism. There was further technical work to be carried out on some of these issues. However concerns about the impact of sharing the access with local businesses meant that this site was not been taken forward into the pre-submission draft.

6.15 *Temporary Stopping Place A49, Leominster*

6.16 There were a number of objections received to this site including the principle of providing such a site at a gateway location, impact on businesses and highways. Many concerns were raised that the site would not be properly managed and this would have detrimental outcomes. The Council believes that many of these concerns can be addressed by the provision of an authorised site itself and the management strategy for it which is being developed by the Licencing Team. Policy TS3 sets out a number of policy criteria which address the issues raised.

6.17 The Council has liaised with the Environment Agency regarding flooding who have confirmed with them that detailed modelling shows that the area is in fact outside flood zones 2 and 3.

6.18 The use of nearby laybys was suggested as an alternative to this site. However discussions with the Highways Agency confirmed that this is not a viable alternative. The Council is continuing to work with the Highways agency concerning the access to the site off the A49.

6.19 Network rails specified requirements for fencing residential development next to the operational railway and this has been incorporated into policy TS3.

6.20 *Land adjacent to Whitfield Coppice Trumpet.*

6.21 This site was included in the preferred options plan as having potential for residential pitches. There were a number of objections to this site based on a number of concerns as outlined in the summary. Following consultation a number of technical pieces of work were carried out to address some of these issues in relation to flood risk, contaminated land and highways issues. There

were still unresolved issues in relation to highway safety and given the revised figures in the GTAA 2017 update the site has not been taken forward to the pre-submission publication stage.

6.22 Extension of Orchard Caravan Park at Watery Lane, Lower Bullingham.

6.23 Overall there was more support than objection for the additional two pitches at this site. A concern was expressed that the site would become overcrowded but as this is an extension to the site rather than an intensification this is not considered to be the case. Concern was raised about the safety of pedestrian access to and within the site. However there is an existing pedestrian and cycling link between Watery Lane and Twyford Road which links to Straight Mile where there is a bus stop. This route is identified in the Rotherwas Travel Plan 2014 as having potential for improvement and there are also plans for this link to form part of the bus route to serve the new housing allocated in Policy H6 of the Core Strategy at Lower Bullingham.

6.24 Land near Sutton St Nicholas

6.25 There were a number of objections to the proposal for this site as outlined in appendix 5. Many of these related to its open countryside location which is in principle acceptable within the criteria of Policy RA3. Further technical work was carried out in relation to highways (speed assessment) and flood risk. However given the revised figures in the GTAA 2017 update the site has not been taken forward to the pre-submission publication stage as it was considered preferable to make more efficient use of land by meeting the reduced requirement through site extensions and intensifications.

6.26 Extension to the Local Authority site at Pembridge.

6.27 Overall there was more support for this proposal than objection. There were representations raised concerning the management of the site which are being addressed by the Council's Travellers team. There were concerns about the safety of children in relation to the adequacy of the sewage treatment works. However this has been assessed and is considered to be in good working order. The parish council requested that the Council reconsider an extension to the east of the existing site rather than to the south. This representation together with findings of the flood risk assessment of the area to the south resulted in the identification of an extension to the east of the existing site in the pre-submission document.

6.28 Openfields Caravan Site, Bromyard.

6.29 Overall there was more support for this proposal than objection. Some of the objections relate to management issues which are being addressed through a multi-agency working group and are considered to have improved. The

redevelopment of the two pitches would prevent that land being used for inappropriate uses. Concerns were raised about the impact on the extension of a heritage asset. However given that this is an intensification within existing site boundaries and there is no direct visibility this is not considered to be an issue.

6.30 Romany Way Caravan Site, Grafton.

6.31 Overall there was more support for this proposal than objection. Concern was expressed that the additional pitch would make the site too cramped. However the suggestion for an additional pitch was made by the residents themselves. The location of the additional pitch has moved to the former warden's office to allow the retention of the existing play area.

6.32 **Other Issues raised:** In addition to the site specific comments that were raised comments were invited on what issues policies in the DPD should refer to. Policies TS1 and TS2 have been drafted with reference to the representations received to cover environmental protection issues and the requirements for sites in terms of amenity and facilities. The following paragraphs summarise some of the additional points that have not already been covered above.

6.33 **Longer term supply of sites:** A number of representations were made about this but given the findings of the revised GTAA there is not currently a need to identify sites beyond the five year supply.

6.34 **Funding and delivery:** The funding of the new sites was questioned. Although the financing of the proposals is not a matter for consideration for the Travellers' Sites DPD, detailed financial implications are being assessed separately for consideration in the Council's capital programme process. Confirmation has now been received from the Homes and Community Agency that match funding is potentially available to apply for from the Shared Ownership and Affordable Homes Programme 2016 – 2021. •

6.35 **Sites in the AONB** Representation from the AONB unit stated that there should be specific reference to no adverse impacts in the AONB. The site in Ross on wye is not included in the pre-submission website. None of the other sites are located within an AONB. Should any applications come forward for sites within the AONB they will be considered against Policy LD1 of the Herefordshire Core Strategy. The AONB units will be consulted in such cases.

6.36 **Historic environment** – It was suggested that policy guidelines are amended to ensure the historic environment is properly considered. Whilst reference to

the historic environment has been included the Sustainability Appraisal has identified a further need to strengthen this policy.

7.0 Appendices

Appendix 1 – Consultees

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out those bodies that the Council must consult with when preparing plan documents and planning applications.

Organisations and Groups targeted include central, regional and local Government organisations, adjoining local authorities, statutory bodies such as Highways England and utility companies, community, voluntary, resident and interested groups, members of the public, Parish/Town Councils, local businesses, developers and agents.

Appendix 2 – Letter

Travellers Sites Development Plan Document Preferred Options – Public Consultation

Herefordshire Council is preparing a Travellers Sites Development Plan Document which when adopted will form part of the Herefordshire Local Plan. This Plan will identify sites to provide for the assessed accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Public consultation on this document starts on Monday 25 July and finishes on Monday 19 September 2016.

The Consultation document puts forward a number of possible sites. This allows the opportunity for open debate about the most suitable locations for this purpose. No final decisions on which locations will be used have been taken. This is your opportunity to let us know your views on the sites as well as suggesting other possible sites.

The Preferred Options Document, accompanying documents and on-line questionnaire are available at www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document

Hard copies of the documents are also available to view at libraries and customer service centres across Herefordshire. Paper copies of response forms are also available at these locations.

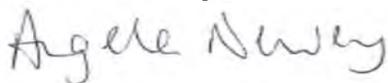
A number of drop-in events will be held in early September. Details of times and venues will be posted on our website.

The council is also inviting suggestions of other sites to be put forward for consideration to fulfil projected requirements for 2020 onwards and a form for this purpose is available on the website.

Please send your comments to us by 19 September 2016 by completing the online or paper questionnaire. However if you prefer you can email your comments to ldf@herefordshire.gov.uk or send them by post to Planning Policy Team, Herefordshire Council, Blueschool House, Hereford HR1 2LX

For more information please go to: www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document or contact 01432 260137/383357

Yours sincerely



Angela Newey
Senior Planning Officer
01432 383637

Appendix 3 – Response Questionnaire

Traveller Sites Document – Preferred Options Public Consultation 25 July – 19 Sept 2016

Please return your completed form by 5pm on Monday 19th September 2016

By email ldf@herefordshire.gov.uk

Or post Forward Planning
PO Box 230
Blueschool House
Hereford
HR1 2ZB

Responses will be published following the close of consultation.

Please note that any information you provide will be held and used in accordance with the Data Protection Act 1998 for the purposes set out above. It will not be shared with any third parties. Any comments provided may be included in an anonymous form in any published results.

Any views considered to be racist and/or personally abusive will be disregarded.

If you require further information or assistance, please contact the Planning Policy Team. Tel: 01432 260137

(Please refer to section 6 of the Development Plan Document, when answering the following questions)

Do you agree with the number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople?

- Yes
No
Not sure

If no, please explain.....

.....

Do you agree that we need to find sites for the 18 pitches arising from families living in houses, given the revised definition of Travellers in the Government Planning Guidance for Travellers?

- Yes
No
Not sure

If no, please explain.....

Do you agree with the plan to provide stop over places with temporary facilities?

Yes

No

If no, please explain.....

.....

Do you agree that the time spent on these sites should be limited to 14 days?

Yes

No

If no, please explain.....

.....

Can you suggest any other sites that are available and suitable for temporary stopping use?

Yes:

(If you have more detail, please complete the site submission form)

No

Given the low number of required plots for Travelling Show people, do you think there is a need for extra plots to be identified in the plan?

Yes

No

If no, please explain.....

.....

Can you suggest any suitable sites which are likely to be available for this use?

Yes:

(If you have more detail, please complete the site submission form)

No

(Please refer to section 8 of the Development Plan Document, where there are location plans, when answering the following questions)

Site number 1

Do you agree that land adjacent to Broadmeadow Yard, Ross on Wye could be a suitable location for a temporary stopping place?

- Yes
- No

If no, please explain.....
.....

Site number 2

Do you agree that land at A49 roundabout near Leominster could be a suitable location for a temporary stopping place?

- Yes
- No

If no, please explain.....
.....

Do you have any suggestions of other sites for use as temporary stopping places?

Yes:
(If you have more detail, please complete the site submission form)

- No

Site number 3

Do you agree that land adjacent to Whitfield Coppice, Trumpet could be a suitable site for a residential traveller site?

- Yes
- No

If no, please explain.....
.....

Site number 4

Do you agree that an extension to Orchard Caravan Park at Watery Lane, Lower Bullingham could be a suitable option for two residential pitches?

- Yes
- No

If no, please explain.....
.....

Site number 5

Do you agree that land near Sutton St Nicholas could be a suitable site for a residential traveller site?

- Yes
- No

If no, please explain.....

Site number 6

Do you agree that an extension to the local authority site at Pembridge could be suitable for more residential pitches?

- Yes
- No

If no, please explain.....

Site number 7

Do you agree that two additional residential pitches on Openfields Caravan Site, Bromyard is a suitable option?

- Yes
- No

If no, please explain.....

Site number 8

Do you agree that an additional residential pitch on Romany Way Caravan Site, Grafton is a suitable option?

- Yes
- No

If no, please explain.....

Do you have any suggestions of alternative or additional sites to help meet the need for pitches and plots in Herefordshire?

Yes:
 (If you have more detail, please complete the site submission form)

- No

Should any of these sites be considered as affordable Traveller sites?

- Yes
- No

If no, please explain.....

.....

(Please refer to sections 9 and 10 of the Development Plan Document when answering the following questions.)

Do you agree with the approach to the longer term supply of sites?

- Yes
- No

If no, please explain.....

.....

(Please refer to section 11 of the Development Plan Document when answering the following questions)

Do you agree with the issues identified for consideration in section 11.2?

- Yes
- No

If no, please explain.....

.....

Are there any other issues that should be included in the policy?

Yes

.....

No

Are there any other policies that should be included in the document?

Yes

.....

No

Do you have any comments on the Sustainability Appraisal (SA) and/ or the Habitats Regulations Assessment (HRA)?

Yes

.....

No

Do you have any other comments on the consultation document that are not covered by these questions?

Yes

.....

.....

No

Please use additional sheets of paper if you need extra space for comment on any of the questions.

We are also inviting people to provide suggestions of additional sites that may not already have been considered.

If you would like to suggest a site, please use the site submission form or for more information please go to:

www.herefordshire.gov.uk/planning-and-building-control/planning-policy/travellers-sites-document

Please complete your contact details.

Name:

Address:

.....

.....Postcode.....

Tel No:

Email:

How did you hear about the consultation?

Email

Letter

Newspaper If so which one?

Council website

Social Media

Other

If social media or other please specify:

In order to help us ensure that our services are accessible to all, we would appreciate it if you could take the time to complete the separate equality and diversity monitoring form.

It will only be used for the purpose of statistical monitoring, treated as confidential and **not** used to identify you.

Would you like to continue receiving information about forthcoming policy preparation and consultation?

Yes

No

www.herefordshire.gov.uk/traveller-sites-consultation

News release

PR xxx/16

Xx July 2016

Authorised Travellers' sites public consultation launches

Herefordshire Council has launched a public consultation on potential new sites and site extensions for Gypsies, Travellers and Travelling Show People, as part of the preparation of the Herefordshire Local Plan Traveller Site policy.

Research carried out to assess current and future accommodation requirements of Gypsies, Travellers and Travelling Show People has identified a need for additional authorised and transit pitches. As a result, action is being taken to address the shortfall of available sites for those needing a base in Herefordshire as well as those travelling across the county.

Detailed studies have identified the level of need in our district as being 19 permanent pitches, 5 for Travelling Show People and 3 temporary stopping pitches in the first five years of the plan.

The locations under consideration, following the 'call for sites' that ran from December 2015 to February 2016, are:

- Ross on Wye
- Leominster
- Lower Bullingham
- Bromyard
- Trumpet/Pixley
- Pembridge
- Sutton St Nicholas
- Grafton

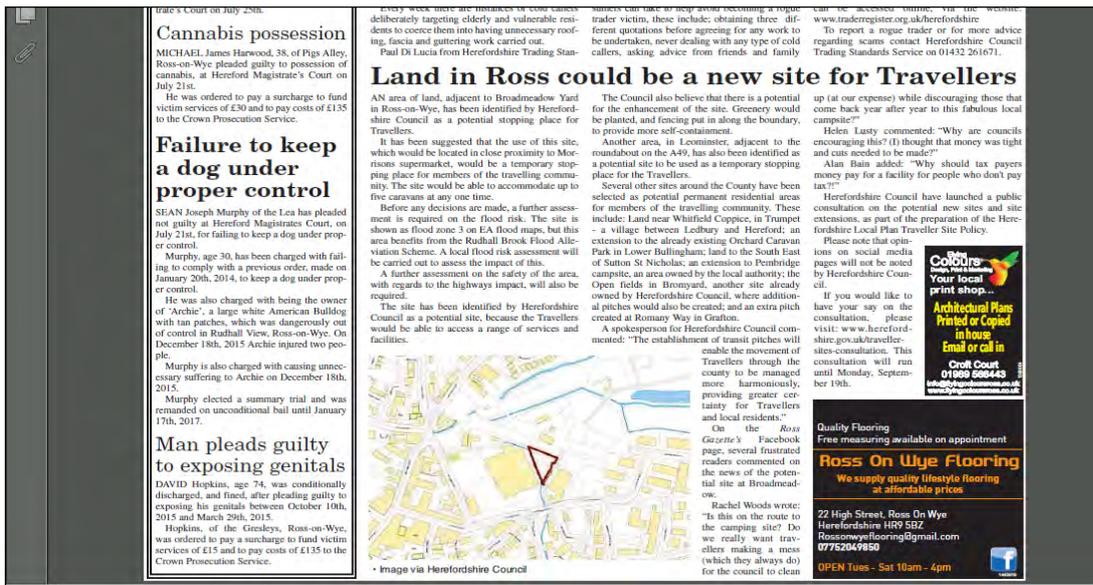
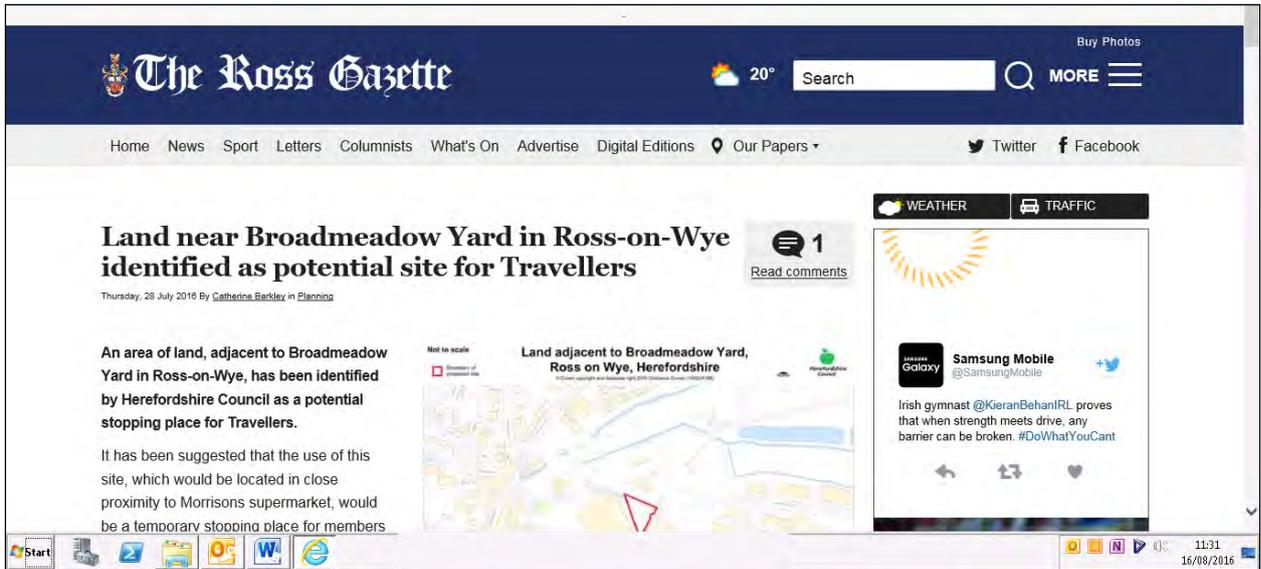
The establishment of transit pitches will enable the movement of Travellers through the county to be managed more harmoniously, providing greater certainty for Travellers and local residents.

The council is still inviting land to be put forward for consideration of possible new sites as further sites will be required for 2020 onwards.

The consultation runs from Monday 25 July to Monday 19 September 2016 and can be found at www.herefordshire.gov.uk/traveller-sites-consultation

Hard copies can also be viewed at information points such as libraries and customer service centres across Herefordshire.

The consultation featured in various newspapers in hard copy and on websites:



Public consultation launched on potential pitches for gypsies, travellers and travelling show p - Internet Explorer

http://www.ledburyreporter.co.uk/news/14652834.F

Public consultation launc...

REGISTER | SIGN IN Search

Ledbury Reporter

Ledbury 23°C

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NEWS SPORT JOBS YOUR SAY PICTURES WHAT'S ON PROPERTY ANNOUNCEMENTS CARS SECTIONS

News > Ledbury Regional Letters Business National Travel Latest

Public consultation launched on potential pitches for gypsies, travellers and travelling show people in Herefordshire



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Most popular

- 1 Man crashes into wall following celebrations of daughter's birth

11:35 16/08/2016

Public consultation launched on potential pitches for gypsies, travellers and travelling show p - Internet Explorer

http://www.herefordtimes.com/news/14652834.Put

Public consultation launc...

Hereford Times

Hereford 21°C

FREE delivery

Oak furnitureland

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News > Hereford City County Ledbury Community News Regional Business Letters National World War One Features One In 8

Public consultation launched on potential pitches for gypsies, travellers and travelling show people in Herefordshire



Most popular

- 1 Man crashes into wall following celebrations of daughter's birth
- 2 Herefordshire Council's former

http://www.herefordtimes.com/news/business/?ref=mmav

11:37 16/08/2016

www.herefordtimes.com/news/24736996/Concerns_raised_about_proposed_travellers...

Ocean Colour Scene Sep 17 at Caerphilly Castle Buy tickets

Champions League of Darts (Afternoon... Sep 24 at Motorpoint Arena Cardiff Tickets Buy tickets

NEWS SPORT JOBS LETTERS HEREFORD FC WHAT'S ON PROPERTY ANNOUNCEMENT

News > Hereford City County Ledbury Community News Regional Business Letters Nation

Concerns raised about proposed travellers site near town centre



Photo from Google Maps.

4 hrs ago / **Rebecca Cain**, Senior reporter / @rebeccacain_HT

4 comments

CONCERNS have been raised about a proposed travellers site in **Ross-on-Wye**, which councillors said is too near the town centre.

At the monthly Ross-on-Wye Town Council meeting, councillors said they did not support the proposed site for travellers on land next to Broadmeadow Yard in Ross, next to Morrisons.

The site has been put forward as part of the preferred options in a travellers consultation being run by **Herefordshire Council**.

Cllr Richard Mayo said the county has legally got to find room for travellers but added:

Most

- 1
- 2

Public consultation launched on potential pitches for gypsies, travellers and travelling show p - Internet Explorer

http://www.worcesternews.co.uk/news/regional/14

Public consultation launc...

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HOMESTYLE Clear Vision Ltd

Worcester News

Worcester 23°C

when our coffee machine stopped working, our business didn't

LLOYDS BANK

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News > Regional > Worcestershire Herefordshire West Midlands Gloucestershire Shropshire

Public consultation launched on potential pitches for gypsies, travellers and travelling show people in Herefordshire



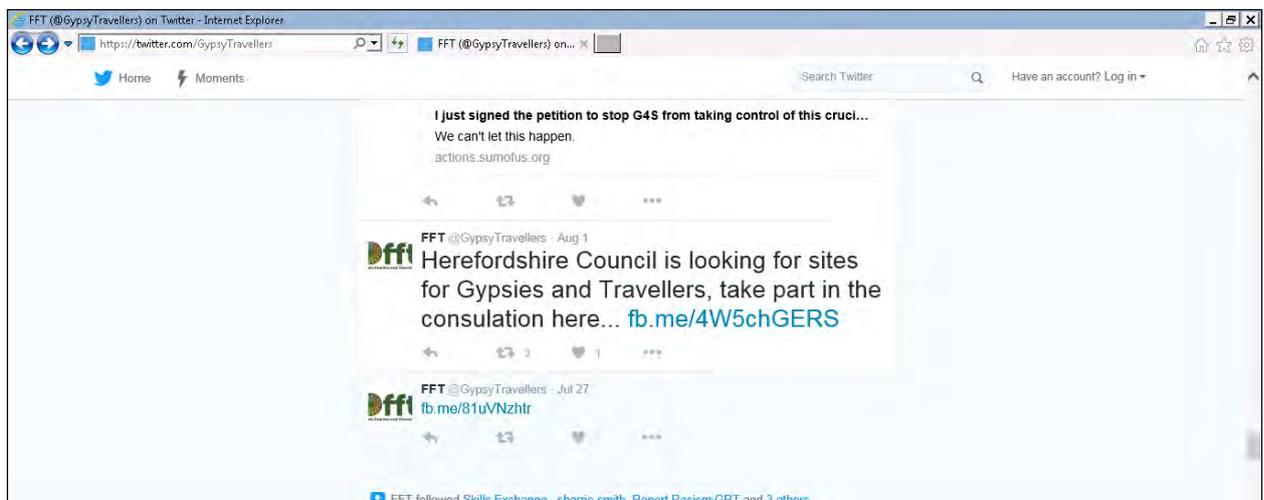
Most popular

- 1 LIVE: Firefighters battle lorry fire on

Start

12:49 16/09/2016

It also featured on Herefordshire County Council social media regularly throughout the consultation, as well as 'Friends, Families and Travellers', Hereford Voice and Ross Gazette Facebook and Twitter pages.



Hereford Voice | Facebook - Internet Explorer
 https://en-gb.facebook.com/herefordvoice/

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- Events
- Videos

Hereford Voice
 25 July at 01:30 · 🌐

Authorised Travellers' sites public consultation
 25 July 2016
 ... See more



Local Plan traveller sites consultation - Herefordshire Council
 Information about the travellers sites development plan document (DPD) consultation for the Local Plan
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Appendix 5 – Summary of responses received on Traveller Sites Development Plan Document - Preferred Options consultation July 25th to 19th September 2016

Q.1 Do you agree with the number of pitches required for residential and temporary stopping places and the number required for Travelling Showpeople?

Yes 30

No 50

Not sure 33

- The majority of respondents answered 'no' that they did not agree with the figure.
- Of those who explained their reasons for answering 'no' in relation to overall provision, 11 believed the figure was too high and 4 considered the figure too low.
- There were concerns raised in relation to the number of sites proposed in the evidence base due to assumptions used to establish the need instead of interviewing Travellers.
- Empty pitches on existing sites indicates that the need for new pitches is not justified.
- Potential for turnover to be greater than assumed thereby increasing the supply of sites and consequently reducing the need for new pitches.
- The revised definition of travellers in the PPTS has not been taken into account in the GTAA.
- The GTAA is unreliable and conflicting.
- The rationale for turnover is unclear.
- Other frequently mentioned issues included; objection to taxpayers' money used to fund the sites as well as having to deal with the litter left and clean-up costs for the council.

Q.2. Do you agree that we need to find sites for 18 pitches arising from families living in houses, given the revised definition of Travellers in the Government Planning Guidance for Travellers?

Yes 28

No 60

Not sure 23

- The majority of respondents answered 'no' (60) that they did not agree with the need to find 18 pitches arising from families living in houses.

- Of those who explained their reasons for answering 'no' in relation to overall provision, 41 believed the figure was too high and 8 considered the figure too low.
- The evidence used to reach this figure was questioned by nine respondents as no interviews were carried out locally.
- Many respondents found it difficult to comprehend why Travellers living in dwelling houses would prefer a pitch as they believe that housing is a better option.
- The Council's focus should be on housing the homeless.
- The Council should have regard to the national definitions of travellers in the PPTS
- Other frequently mentioned issues included; objection to taxpayers money being used to fund pitches for Travellers living in houses as there are more significant budget pressures on the Council.
- Some also felt that Travellers were getting special treatment because of their lifestyle.

Q.3. Do you agree with the plan to provide stop over places with temporary facilities?

Yes 62

No 50

- The majority of respondents were in favour of temporary facilities provision. Those who answered 'yes' believed that it assists those who are passing through the area therefore preventing encampments in unauthorised locations such as council car parks and open space.
- Without the provision of a transit site or temporary stopping place the police have no legal power to remove travellers from unauthorised encampments other than via the S69 of the Criminal Justice and Public Order Act which is only invoked in aggravated trespass circumstances.
- Provision of a transit site/ temporary stopping places would enable the police to legally direct an authorised encampment to other preferred location. This will reduce community tension and financial burdens on landowners, policy monitoring, associated crime, loss of trade and clean-up costs.
- The majority who answered no were concerned about the management and policing of the temporary sites.
- Those who answered 'no' were also against such provision because of past experiences following encampments.

- Some respondents mentioned a lack of respect for settled people because of the attitudes of some Travellers and their treatment of sites and local people.
- Those against temporary provision believe that if Travellers choose this way of life then it should be their responsibility to pay for such sites as well as clean-up costs as Council budgets are very stretched with bigger priorities.
- The majority of respondents believe that Travellers do not pay any contribution towards temporary stop sites.
- May be an increased demand for temporary agricultural workers as a result of Brexit.

Q.4. Do you agree that the time spent on these sites should be limited to 14 days?

Yes 65

No 43

- The majority of respondents (65) were in favour of maximum stay of 14 days on temporary sites. 43 respondents did not agree with this limit and 34 provided no answer.
- Those who answered 'yes' highlighted issues with enforcing this maximum stay.
- There were some suggested circumstances where this may need to be lengthened because of bereavement or illness within the family using a transit site.
- Some of those who answered 'no' (43) explained that 14 days is not long enough. The time limit could be increased to allow take up of temporary work subject to good behaviour.
- Others felt that 14 days is too long to be considered a stopover. Some respondents were against this provision because it encourages this lifestyle too much which affects the children's potential. Some respondents felt that Travellers should utilise commercial sites for stopovers just like the settled community do.

Q.5. Can you suggest any other sites that are available and suitable for temporary stopping use?
(See also question 7)

Yes 13

No 87

- Although 13 respondents answered yes, there were only two general areas suggested:

- o Bringsty Common – no specific area identified
- o Council car parks

Q.6. Given the low number of required plots for Travelling Show people, do you think there is a need for extra plots to be identified in the Plan?

Yes 24

No 80

Not sure 2

- Commercial caravan/camping parks could be used by travellers at commercial rates
- Several areas should be identified to give local resident tax payers a choice, this way the decision is not forced on people.
- This should not be the duty of councils and local tax payers
- Travelling Show people are capable of finding their own sites and have existing adequate provision.
- Travellers should pay for their accommodation.
- Differentiate between Travellers and Travelling Show People.
- A number of suitable sites can effectively accommodate both travellers and travelling show people.
- If there is no additional demand over what is already provided, there is no need for extra plots.
- A need in the South West (of the County).
- Travelling show people usually stay on the site of the show. When the show has finished they move on. During the 'off' season people usually return to their point of origin.
- Travelling Show People find it very difficult to find suitable sites.
- Travelling Show people numbers are declining.
- No specific research has been done to suggest a need.
- Sites are dumping grounds causing rat infestation.
- The Show people sites in Ross should be checked to see if any land is available in that part of town.

- It is the Council's duty as this is a very hard land use to meet and it is very difficult for show people to find sites. If the need is low that is no reason to ignore. That is a self-perpetuating situation. There is a suppressed need for more pitches across the country and probably in Hereford and strongly suspect many have been forced to relocate to where there are pitches. Aware of huge problems in Gloucester/ Tewkesbury for show persons finding sites (e.g. Gotherington group). This should be addressed. Many live in overcrowded conditions and need the Council to help improve their situation rather than ignore it. Show Persons deserve better than this.

Q.7. Can you suggest any suitable sites which are likely to be available for this use (ie for Travelling Show People)? (See also question 5)

Yes 7

No 85

- Jays Green adj M50
- Old Council Yard (no further information given)

(Although 7 respondents said yes there were only two suggestions of sites)

Question 8 Site 1. Broadmeadow Yard, Ross-on-Wye. Do you agree that land adjacent to Broadmeadow Yard, Ross-on-Wye could be a suitable location for a temporary stopping place?

Yes 35

No 49

- Broadmeadow appears to be in an industrial estate and is therefore unsuitable for families
- Concern about proximity to nearby caravan park. May cause confusion and illegal encampments on the caravan site.
- Concern that will discourage tourists affecting town's economy.
- Inadequate size for the number of Travellers that come to Ross judging from recent experiences in 2016.
- Showpeople may own alternative sites that could be used
- Risk of litter in the culvert may cause flooding
- Not a suitable site if horses are involved.

- A temporary stopping place in the town centre is unsuitable for Travellers. A better site is located away from other uses in a more isolated location. Stopping place better along a primary road network or main route of travel.
- Consider nearby heritage assets

Question 9 - Site 2. A49 roundabout near Leominster. Do you agree that land adjacent to A49 roundabout near Leominster, could be a suitable location for a temporary stopping place?

Yes 50

No 31

Additional petition with 94 signatures against the site from local businesses

- A busy area, with lots of traffic. Not safe for children.
- Might be better as a site for storage of showground equipment
- Site subject to flooding
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Concerned about the site becoming a permanent site instead of its intended temporary use.
- Will not be possible to address flood issues through SUDS and in winter conditions would be unacceptable for residents.
- Concerns over access in proximity to the A49.
- Large gas and water main under site with associated easement which would preclude development.
- Better alternative would be to consider use of laybys close to this site which would provide a better, safer environment for occupants and provide better value for money
- Noise and pollution issues so close to a main road
- Historic Lammas meadows nearby.
- Risk of contamination to River Lugg (SSSI)
- Gateway site into Leominster, not good for tourism
- Too close to the industrial estate which would deter businesses locating there

- The site proposal is not in accordance with paragraph 58 of the NPPF where safe environments preventing crime should be promoted. It is unlikely that the design of the proposed site could promote community safety and/or social cohesion.
- Concern over environmental impact on river and escalation of current theft/poaching issues
- Consider nearby heritage assets
- Good location on the strategic highway network. Good access to a range of services and facilities. Travellers already use the general area.
- Any traveller site is deemed the same as any residential development next to the operational railway should the Council choose to develop a site next to the operational railway they must provide a suitable trespass proof steel palisade fence of a minimum 1.8m in height to mitigate any risks that the development might import.
- Inadequate consultation.
- Sensitive green belt site in the wrong location and difficult to control increases in the number of caravans in the future.
- Concern over flood risk, increase in insurance premiums, property value decrease, management of site and personal safety
- The abuse and disrespect for the site is still an issue.

Question 10 - Do you have any suggestions of other sites for use as temporary stopping places?

Yes 6

No 83

- Jays Green Linton
- Suggest a purpose built site within the construction of the new relief road
- The old warehouse site past the cattle market by Labels roundabout
- Primary routes unsuitable due to traffic pollution. Risk of national and regional use at cost to Herefordshire residents.

Question 11 Site 3. Whitfield Coppice Trumpet. Do you agree that Whitfield Coppice Trumpet, could be a suitable site for a residential traveller site?

Yes 43

No 34

- Concern about the delivery of the site as it is not Council owned
- The proposal does not meet criteria 1, 2, 5, 6 of policy H4
- The site would dominate the residential properties around Trumpet crossroads.
- Remote from services and settlements.
- Current ground contamination.
- Previous application refused on highway safety grounds.
- Risk of significant negative impact on Special Wildlife Site and ancient semi natural woodland.
- Concern about local businesses being affected.
- No existing infrastructure for mains water, gas and sewerage.
- The need to maintain and enhance the rural and historic environment and biodiversity of the area is imperative.
- Not safe for children.
- Will put pressure on public services when the residents will not be paying taxes at same levels as residents.
- Local economy cannot support this provision.
- It has grazing land available for horses which is good for Travellers
- Not near other dwellings, good use of waste land.
- Not a brown field site, why should travellers be allowed open farmland?
- Should not mix Travellers with settled people
- The speed limit should be extended beyond the site entrance
- Consider nearby heritage assets

Question 12 - Site 4. Orchard Caravan Park at Watery Lane, Lower Bullingham. Do you agree that Orchard Caravan Park at Watery Lane, Lower Bullingham, could be a suitable option for two residential pitches?

Yes 52

No 24

- Extending an existing site seems a more cost effective solution
- Good local vehicle network.
- Already a local authority owned and managed site
- Two further plots would make it cramped and overcrowded with no local facilities with no room for any other community facilities like play area
- Pedestrian access to and within the site is dangerous
- Concern about how existing residents will accept more on the site.
- Question how provision of extra pitches would be funded.
- Acknowledge that the study has identified the opportunity for a joined up approach regarding the new access into the extension site and employment site and would emphasise the vital importance of this as to not compromise the future viability of, and ability to gain access to, the Enterprise Zone employment site to the south in any way.
- Need to ensure that the future viability of, and ability to gain access to, the Enterprise Zone employment site to the south is not compromised in any way.
- Consider nearby heritage assets
- There is no respect for site filth and debris left behind for the cost of local government

Question 13 Site 5. Land near Sutton St Nicholas. Do you agree that Land near Sutton St Nicholas, could be a suitable option for five residential pitches?

Yes 30

No 60

- The location of the site will encourage unsustainable car travel to the village and to access other facilities in Hereford.
- Unsafe routes to school along the Ridgeway and school lacks capacity for new pupils.
- The Rhea is affected by flooding from the river Lugg which would rule out access to the village from the southern part of the site. It is unlit and therefore would restrict use after dark.
- Significant harm to the character and appearance of the surrounding landscape with an urbanising impact.
- Contrary to national, county and local neighbourhood plan policies.
- Any planting screening could compromise the landscape character.

- Impact on local residents.
- The proposal cannot be justified as an 'exception' as this can only be applied to planning applications.
- Loss of greenfield land which is not an effective use of land.
- The site lies within a minerals safeguarding area
- An isolated site outside in the countryside not in line with policy
- Concern about utility provision and cost of site set up
- Conflicts with the recently submitted NDP
- Concern about accommodation of school places at the Sutton St Nicholas Primary
- Lack of a local medical facility
- No footpaths or nearby public transport encouraging car use. Proposed access is hazardous to all. Farm vehicles and HGV use.
- The lane is at risk of flooding annually leading to cut off. Possible water table issues/flooding impact on drainage issues.
- Threat of Legal action from our Insurance companies for the Tort of Nuisance if development takes place.
- The land is high quality agricultural land not suitable for residential development
- Inadequate local village facilities and services to justify locating a site nearby
- Significant impact on users of the public footpath.
- Risk of loss of the PROW
- Concern whether the council has acquired this land intending it for Traveller use without consultation
- Light pollution in this area would be unacceptable
- There is a badger set onsite.
- Consider nearby heritage assets
- The public right of way adjacent to the site will have to be closed. The danger to Sutton People and especially their children because dogs and rats etc. would make it unsafe.
- Site not required in order to meet the assessed need.

Question 14 Site 6. Extension to the Local Authority site at Pembridge. Do you agree that an extension to the Local Authority site at Pembridge could be suitable for more residential pitches?

Yes 54

No 30

- Extending a site that already exists would be more cost effective
- Extension to the site should be considered on the north east instead of along the road
- Travellers dislike the site because of its location and poor state. Extending it would not improve it but create further problems
- Unsafe for children
- Already a local authority owned and managed site. Extension to the south could share existing access. Site served by public bus service.
- The current plots are empty which leads to questions of need in the rural location
- There are no additional facilities for families and it is a dangerous place for children who tend to spend a lot of time outside.
- It would affect tourism
- Consider nearby heritage assets

Question 15 - Site 7 Openfields Caravan Site, Bromyard. Do you agree that two additional residential pitches on Openfields Caravan Site, Bromyard is a suitable option?

Yes 54

No 25

- Established sites would cost less and seem an obvious solution
- Local authority owned and managed sites .Efficient use of land.
- Minimal landscape impact as within existing boundaries of existing site. Good road access
- Site should have no more than 5 plots for better management of anti-social behaviour
- The site requires better management otherwise it should not be extended.
- The site has had 8 new pitches recently and needs time to bed in before expansion

- There continues to be significant issues with unlicensed vehicles, fly tipping, unlicensed waste transportation and obstruction of the estate road.
- Question how would improvements be funded
- Consider nearby heritage assets

Question 16 Site 8. Romany Way Caravan Site, Grafton. Do you agree that an additional pitch on Romany Way Caravan Site, Grafton is a suitable option?

Yes 58

No 20

- Romany close is extremely cramped. This site would work well as a transit site only
- Local authority owned and managed sites.
- Efficient use of land. Minimal landscape impact as within existing boundaries of existing site.
- Good road access.
- Away from major housing areas
- Concern about expansion and Traveller community cohesion
- Consider nearby heritage assets
- Question whether there should be two extra pitches on the existing site to minimise the risk of unauthorised settlements.

Question 17 Any suggestions of alternative or additional sites to help meet the need for pitches and plots in Herefordshire?

Yes 7

No 86

No suggestion of sites made despite 7 respondents answering 'yes'

Question 19 Do you agree with the approach to the longer term supply of sites?

Yes 37

No 49

- If Councils are paying upfront for these sites there should be charges for those using the sites.
- A further review of the evidence is needed in the future. Until that happens any long term consideration of site supply is a waste of time and can only lead to unnecessary effort and expense
- Not enough choice Not enough certainty
- Unresolved issues with sites put forward
- Cannot rely on windfall sites due to problems with local opposition
- Need greater certainty which will only be achieved through allocations
- Travellers should accept that living in a house is acceptable and no need for pitches
- Policy should discourage the Traveller lifestyle. Children need to be settled as they are at a disadvantage when travelling.
- Identify the sites now rather than having to do it again in a few years' time
- Some long term provision is required
- Sites could be designed into the Hereford Bypass route
- Revise GTAA report because of traveller definition
- Research is not Herefordshire specific and unproven demand.
- Information should be Herefordshire specific and existing sites need to be fully used before extensions are considered
- Restricting sites to the locations suggested in policy SS2 is too restrictive and will unreasonably prevent the delivery of acceptable sites elsewhere. Policy H4 already provides sufficient guidance on site location.

Question 20 - Do you agree with the issues identified for consideration in section 11.2?

Yes 45

No 33

- Unfair that taxpayers will be paying for this accommodation
- Discourage the Traveller lifestyle and there is no need for permanent sites

- The Core Strategy policy is adequate on design and paragraph 11.2 only repeats the PPTS requirements
- Careful design will help to minimise the impact
- Sites in the AONB should have specific reference to no adverse impacts in the AONB.
- H4 provides sufficient design guidance – no additional guidance is required.

Question 21 - Are there any other issues that should be included in the policy?

Yes 24

No 50

- Question the procedure for removal of sites that are not favoured by the local community.
- Question how monies will be recovered for illegal encampment and clean-up costs
- Brownfield sites only
- Compensation for businesses blighted by their presence
- Locations must have regard for the relevant Neighbourhood Plan
- Regular waste/bin collections to ensure the local community are not subjected to untidy and unhealthy waste.
- Travellers causing trouble should be expelled from sites. Ste out standards of behaviour on sites
- Council should review its land bank for potential sites
- Consider impacts on local services
- Lack of understanding amongst people about Traveller culture but Travellers must understand settled community
- Concern about having large numbers of travellers on a site as it causes problems
- With pressure on other service areas is it necessary to meet 100% of the need.
- The layout of sites and design of buildings is crucial in minimising impact on local surroundings. Sites should be developed using design criteria which could be spelt out in detailed guidance to assist in making planning applications.

Question 22 -Are there any other policies that should be included in the document?

Yes 16

No 57

- The availability of local services (e.g., education, doctors etc.) need to be considered.
- Consideration of the NDP
- Proper transit provision should be provided.
- Council should set out a financial policy on how it will fund development of Traveller sites.
More transparency on the Council's purchase of land to meet site need
- The Council needs a well-informed trained person to work within the Council who is able to liaise with the Travelling community.
- Should be a time limit on stopovers. Why permanent sites.
- Suggest policy guidelines are amended to ensure the historic environment is properly considered. Historic England suggest the first bullet point should read: 'Good quality of design to respect the setting of the site, including any potential impacts on designated and undesignated heritage assets'

Question 23 Do you have any comments on the Sustainability Appraisal (SA) and/or the Habitats Regulation Assessment (HRA)?

Yes 5

No 68

- Objectives 1,4 and 16 need revision to fully reflect the impacts highlighted
- The Sustainability Appraisal has most of the appraisals of the objectives set out as being able to have a score, because they cannot be measured without assumptions. If the council has no idea of what the provision is likely to be, how can it commit local public spending to this, comparing it to the known issues in other areas in public spending which are already an issue and are measurable
- Agricultural land change of use will have a negative impact.
- Note the SA report identifies that all 8 of the shortlisted sites will have some kind of impact on nearby heritage assets. All suggested sites will need detailed assessment as recommended.

Question 24 Do you have any other comments on the consultation document that are not covered by these questions?

Yes 24

No 63

- Make the information on the consultation more accessible
- Council funds are stretched enough without having to fund Traveller sites
- Consider areas along the Hereford relief road for potential sites
- Mistrust of Travellers due to previous negative experiences with theft and littering
- Should not have ruled out Mid-Summer Orchard Ridgehill without considering a different layout which could have addressed the visual impact
- Maps on the website are difficult to read
- Focus on enlarging existing sites and not creating new ones
- Concern about agricultural pollution or proximity of livestock on residents of traveller sites
- Having a large site would be easier to plan for rather than a number of smaller sites
- The Old Grafton Depot on the A49 South of Hereford Land adjacent to the M50 opposite Ross Golf Club
- The number of sites proposed is inadequate
- Possibly with a little ingenuity, planning and acquiring of modest amounts of adjoining land they could be made ideal for use as temporary, if not permanent sites
- Should consult specifically with Travellers
- Traveller sites are better situated close to the urban areas due to the proximity of facilities. Priority of services and costs to rate payers to be considered.
- The council's proposed site design policy is appropriate in seeking to protect privacy and residential amenity for neighbouring land uses.
- Support the Councils intended county wide plan led approach to identifying traveller sites, so that these sites can be appropriately assessed at a strategic level.
- It is concerning that the distribution of sites is predominantly in the south of the county

- Any new travellers' sites that may fall within the AONB, including the travellers' windfall sites, respect the status of this designated area. Any such applications within the AONB should be granted only if there are no adverse impacts on the landscape character and other special qualities of the AONB, including tranquillity. The proposals should be consulted with the AONB Unit and considered in accordance with the Malvern Hills AONB Management Plan 2014-19, Landscape Strategy and Guidelines, Guidance on Building Design and other associated guidance.
- No information given about the cost of site provision.
- Concern about the relationship between Traveller DPD and NDPs
- Proportional to housing for general occupation each traveller household takes up more space.
- There should be some recognition of competition for resources and indication of alternative strategies for meeting actual need e.g. use of emergency housing.
- There seems to be an imbalance in the distribution of sites and more may need to be provided in the south of the county.
- Need to ensure appropriate provision for disabled/older travellers.

Appendix C

Travellers' Sites Pre-Submission Draft DPD Consultation

Contents

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1.0 Introduction

1.1 The purpose of this document is to explain how the council has complied with its Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the arrangement of this consultation.

1.2 This statement sets out the methods Herefordshire Council has used to engage with both stakeholders and the community in the preparation of the Travellers' Sites Development Plan Document (DPD) between 6 November and 18 December 2017.

1.3 It details the following information for consultation on the Pre-Submission stage of the Travellers' Sites DPD, which when adopted will become part of the Herefordshire Local Plan.

- Which bodies and persons were invited to make representations
- How those bodies and persons were invited to make representations
- How information was made available to be viewed
- A summary of the main issues raised through representations
- How those issues have been addressed in the DPD

1.4 The following table shows the different stages of preparation and consultation for the Travellers' Sites DPD.

Date	Stage
18 June to 23 July 2014	Sustainability Appraisal Scoping Report – 5 week consultation
21 August to 2 October 2014	Issues and Options – 6 week consultation
21 August to 2 October 2014	Call for Sites
25 July to 19 September 2016	<ul style="list-style-type: none">• Preferred Options – 8 week consultation.• Sustainability Appraisal and Habitats Regulation Assessment – 8 week consultation• Further Call for Sites
17 December 2015 to 14 February 2016	Call for Sites
6 November to 18 December 2017	Pre-Submission Draft – 6 week consultation

2.0 Preparation of the Pre-Submission Document

- 2.1 The pre-submission consultation document has been prepared in the context of the National Planning Policy Framework (2012) and the Planning Policy for Traveller Sites (August 2015). It is informed by the Herefordshire Gypsy and Traveller Accommodation Assessment – Final report (July 2017) which forms part of the evidence base and was prepared by an independent consultation
- 2.2 The findings of the Preferred Options consultation that took place in 2016 also informed the preparation of the preferred options document.
- 2.3 Following the Preferred Options consultation additional work took place to prepare for the final draft, including an update of the Gypsy and Traveller Accommodation Assessment (GTAA). The final GTAA draws upon data from 89 households living on pitches, who completed a survey for the consultants commissioned by the council to carry out the research and write the report. Further technical assessment of potential sites continued participation in the Gypsy, Roma and Traveller Strategy Group, a seminar to which all council members were invited as well as a drop in session for parish councils.
- 2.4 The GTAA recommendation is that the five year supply requirement is between five and six pitches. This is a reduction in the number of pitches identified in the preferred options documents; therefore on this basis not all the previously featured sites are included in the pre-submission document. The new pitches proposed are within or adjacent to council owned sites at 4 locations, Grafton, Lower Bullingham, Bromyard and Pembridge.
- 2.5 The Travellers' Sites DPD also includes a proposed site for use as a temporary stopping place. The purpose of this is to reduce the occurrence of unauthorised encampments in the county. The site is located at the A49, Leominster.

3.0 Consultation Methodology

- 3.1 A range of methods have been used to engage with all potentially interested parties, in order to ensure that they have the opportunity to make a representation.
- 3.2 The purpose of the consultation was to invite views on the soundness of the DPD, the Gypsy and Traveller Accommodation Assessment (GTAA) that sets out the number of pitches required, the Sustainability Appraisal and Habitat Regulations Assessment Report.
- 3.3 Stakeholders and local community members have been informed by email, in writing or face-to-face about ways to get involved in the consultation. The option was given to respond either on or offline.
- 3.4 The following approaches have been undertaken:
 - Direct mailing and emailing to contacts on the database.
 - Circulation of hard copy information to Gypsy and Traveller communities

- Information made available at libraries and information centres across Herefordshire.
- Press releases sent to media across Herefordshire
- Posters displayed on parish notice boards across the county
- Social Media, including an ad campaign
- Cabinet Members' newsletter
- The Council's website
- Drop-in sessions
- Work with Herefordshire Traveller Support to raise awareness amongst the community.

4.0 The Consultation

- 4.1 The Council published the Pre-Submission Draft DPD for consultation from 6 November to 18 December 2017.
- 4.2 Notification letters and emails were sent to Herefordshire Parish Councils, specified consultees, all those who had registered interest earlier in the preparation of the document, stakeholders, neighbouring authorities, prescribed bodies agents, occupants of existing traveller sites in the county and land owners notifying them of the details and inviting them to take part in the consultation. A planning officer visited the local authority traveller sites to provide information on the consultation and answer any questions.
- 4.3 An overview of specified consultees and organisations written to can be found in Appendix 1 of this document.
- 4.4 The correspondence included details of where to find all the gathered evidence and background information and how to make a representation either online or on a printed paper copy.
- 4.5 The following documentation was made available to download on the dedicated webpage www.herefordshire.gov.uk/traveller-sites-consultation and in hard copy at all eleven libraries and information centres across the county.
- Pre-Submission Draft Document
 - Pre-Submission Draft document Summary
 - GTAA Final Version July 2017
 - Sustainability Appraisal Report
 - Habitat Regulations Assessment Report
 - Frequently Asked Questions sheet

- Questionnaire

4.6 The questionnaire invited views on the soundness of the document policies, with specific consideration as to whether the contents of the document is positively prepared, justified, effective and consistent with national policy as well as inviting any other general comment on the document.

4.7 The Council website featured the consultation in the 'New and Featured' pages section on the homepage. The consultation was also publicised through a dedicated ad campaign via the council Facebook page, with additional regular updates and reminders on Facebook and Twitter about where to find more information and invitations to come along to the drop-in sessions. 72,450 people received this content via social media.

4.8 The following table details each method used to distribute information:

Method	Action
Email Specified consultees, Gypsy and Traveller support groups, previous Gypsy and Traveller contacts, parish council clerks & neighbouring authorities	Notification of consultation Sent Friday 3 November Reminder sent part way through consultation
Letter As above to contacts that have not provided an email address. Members of Parliament	Notification of consultation Sent Friday 3 November
Facebook	Dedicated advert posted on page with direct link to web page as well as regular updates throughout consultation
Twitter	Notification of consultation on page with direct link to web page followed by regular updates throughout consultation
Press release	Sent to: <ul style="list-style-type: none"> • Major County media • Travellers Times • Friends, Families and Travellers
Website	Featured on HCC newsreel with direct link to dedicated consultation page, which received 411 unique page views

Radio	Press release sent to local stations
Council Members' Newsletter	Information sent for inclusion in weekly newsletter.
Councillors for parishes with a site identified in their administrative area	Sent personal email with detailed information
Work with Herefordshire Traveller Support to raise awareness amongst community	Notification and key information sent prior to consultation start
Paper copies made available at information points / libraries across the county	Posted to each with instructions
Face to face discussion with Traveller community on local authority sites	Carried out by Senior Planning Officer and Travellers' Support Officer
Drop in sessions at key destinations	Hereford Town Hall – 21 November Leominster Library – 23 November

4.9 As well as on the Herefordshire Council website and social media, among others, the consultation was featured by Hereford Times, Ledbury Reporter, Ross Gazette and ITV.com.

5.0 Responses to the Consultation

5.1 52 responses were received.

Among the contributors were:

- Local Ward Members
- Parish and Town Councils and Councillors
- Neighbouring Authorities
- Hereford Enterprise Zone
- National Grid
- Leominster Civic Society
- Welsh Water
- Historic England
- Environment Agency
- Coal Authority
- Bourne Leisure
- Local business owners
- Individual residents from both the travelling and non-travelling community

Appendices

Appendix 1 - Summary of Consultees

The Town and Country Planning (Local Planning) (England) Regulations 2012 set out those bodies that the Council must consult with, when preparing plan documents and planning applications.

Organisations and Groups targeted include:

- central, regional and local Government organisations;
- adjoining local authorities;
- statutory bodies such as Highways England and utility companies;
- community, voluntary, resident, environmental and other interested groups;
- members of the public;
- Parish/Town Councils;
- local businesses; and
- developers and agents

Appendix 2 – Letter of invitation to take part



Economy, Communities and Corporate Directorate

Geoff Hughes (Director)

«Title» «First_name» «Last_name»

«Organisation»

«Address1»

«Address2»

«Address3»

«Address4»

«Post_Code»

Our Ref:

Please ask for: Angela Newey

Direct line / Extension: 01432 383637

E-mail: Angela.Newey1@herefordshire.gov.uk

Date as postmark

«GreetingLine»

Herefordshire Local Plan - Travellers Sites Development Plan Document Pre-Submission Consultation 6 November – 18 December 2017

Herefordshire Council is preparing a Travellers Sites Development Plan Document (DPD) which when adopted will form part of the Herefordshire Local Plan.

The Traveller Sites DPD will be published along with accompanying evidence base reports for a 6 week period starting on Monday 6 November until Monday 18th December 2017.

During this period comments are invited on the 'soundness' of the plan and whether the correct legal processes have been followed. To be sound policies should be justified, positively prepared and consistent with national policy and effective.

The consultation documents and evidence used to support the development of the Travellers Sites Development Plan Document (DPD) will be available on the Council's website (www.herefordshire.gov.uk/traveller-sites-consultation) from 6 November 2017. Copies of the consultation documents (i.e. Pre-submission Herefordshire Travellers sites Development Plan Document, The Gypsy and Traveller Accommodation Assessment 2017 Herefordshire Traveller Sites, Sustainability Appraisal Report and Habitats Regulations Assessment) will also be available to view at the customer service centres and libraries across the county.

There will be two ways to make a representation on the 'soundness' of the Traveller Sites DPD:

- 1) The preferred method is to comment using the online representation form. It is more environmentally friendly and allows us to analyse responses faster. Online representation will be able to be made at www.herefordshire.gov.uk/traveller-sites-consultation

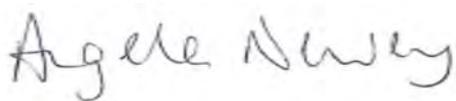
- 2) Comments can also be made using paper copies of the form. The representation form will be available to print from the website (www.herefordshire.gov.uk/traveller-sites-consultation) and can then be completed by hand and returned to Plough Lane.

Paper copies of the form will also be available on request from Plough Lane on 01432 383357.

An information event will be held at Leominster library on 23 November between 3.30pm and 6.30pm. Planning Officers will be available to answer queries on the pre-submission and submission process as well as the tests of soundness and legal compliance.

After the consultation, the council will consider all the representations prior to submitting the DPD to the Secretary of State for examination together with the representations received.

Yours sincerely

A handwritten signature in cursive script that reads "Angela Newey".

Angela Newey
Senior Planning Officer
01432 383637

Travellers' Sites DPD

Pre-submission publication

Representation Form - Guidance

October 2017

The publication period:

The publication will last for six weeks from Monday 6 November to midnight Monday 18 December 2017.

Submitting your comments:

Comments may be submitted in the following ways:

- Online at: <https://www.herefordshire.gov.uk/traveller-sites-consultation> (this is the preferred method).
- By email to: ldf@herefordshire.gov.uk
- By post, using this form, to:
Strategic Planning
Herefordshire Council
Plough Lane Offices
Hereford, HR4 0LE

Please note that comments must be submitted in writing. Telephone or social media comments cannot be accepted.

All the information is available to view at libraries and customer service centres across the county and also online at

www.herefordshire.gov.uk/traveller-sites-consultation

Filling in the form:

This form has two parts:

- You must complete one copy of Part A, which asks for your personal details.
- You should complete Part B for each policy/paragraph that you wish to comment on.

Your comments:

- As this is a statutory stage of publication, no late comments can be accepted after midnight on Monday 18 December 2017.
- All comments will be considered by the Planning Inspector as part of the examination of the document. The Inspector may wish to contact you to discuss your comments and concerns, prior to the formal examination.
- The personal information in Part A will only be used for purposes related to the consultation and the Travellers' Sites DPD examination. Only your comments, name and/or organisation will be published, but your contact details will be shared with the Programme Officer who organises the examination, who will be in touch with those making representations about the examination.

Purpose of the publication:

The purpose of the Travellers' Sites DPD examination is to enable the Inspector to decide whether the document and evidence gathered is 'sound', legally compliant and is in line with national planning policy. A more detailed explanation of this is set out on Part B of the form. Please try to link your comments to these tests of soundness.

Comments must be submitted no later than midnight on Monday 18 December 2017

If you need help to understand this document, or have any other questions about the Travellers' Sites DPD, please contact the Strategic Planning office on 01432 383357 or email Idf@herefordshire.gov.uk

Official use ref:

**Travellers' Sites DPD
Pre-submission publication**

**Comments Form – Part A
Personal details**

Title: Initials:

Surname:

Job title (where relevant):

Company/Organisation (where relevant):.....

Address 1: Address 2:

Address 3: Address 4:

Postcode:

Telephone number:

Email address:

Preferred contact method:

If you are an agent, please indicate below the name of the client that you represent:

.....

If you do not wish to be on our mailing list or receive any further information, please tick the box:

No thank you

Travellers' Sites DPD Pre-submission publication

Comments Form – Part B Comments on soundness

Please complete this form for each section of the document that you wish to comment on.

All representations will be considered by the Planning Inspector as part of the examination. The purpose of the examination is to enable the inspector to decide whether the document and evidence gathered is 'sound'. For it to be sound, there are four key areas of consideration.

The document must be:

Positively prepared - The plan must have been prepared to demonstrate it meets the need for the required pitches and plots and the associated infrastructure required. It also needs to address how we have met the needs of our neighbouring authorities, where it is reasonable to do so and that the proposals will be sustainable?

Justified- Has it taken the right approach and is it based on reliable evidence eg the Gypsy and Traveller Accommodation Assessment (GTAA)? All of the studies we have used to guide us in the decision making can be viewed at www.herefordshire.gov/traveller-sites-consultation.

Effective - Are the proposals deliverable over the plan period?

Consistent with national policy - Are the policies in line with national planning policy? If you feel there is a justified local need to depart from national policy, please provide evidence and make it clear in your comments what those local circumstances are.

You should bear these considerations in mind when making your comments.

B1. Which part of the DPD or GTAA does this comment relate to?

Policy no.

Paragraph no.

B2. Do you consider this part of the document is sound based on the following issues?

(Please read the guidance notes above for an explanation on the four key areas relating to soundness).

Yes

No

- | | | |
|--------------------------------------|--------------------------|--------------------------|
| Positively Prepared (PP) | <input type="checkbox"/> | <input type="checkbox"/> |
| Justified (J) | <input type="checkbox"/> | <input type="checkbox"/> |
| Effective (E) | <input type="checkbox"/> | <input type="checkbox"/> |
| Consistent with National Policy (NP) | <input type="checkbox"/> | <input type="checkbox"/> |

B3. If you have ticked no to any of the above, please give your reasons below with regard to the tests of soundness.

B4. Do you consider that your comment is a representation of:

Support

Objection

B5. Please set out what change(s) you consider necessary to make the policy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your representation should cover all the information, evidence and supporting information necessary to justify the representation and the suggested change, as there will not normally be an opportunity to make further representations. After this stage, further submissions will only be at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues identified for examination.

B6. How do you wish your representation on this issue be dealt with at the examination hearing? Please note: The Inspector will determine the most appropriate procedure to adopt, to hear those who have indicated that they wish to participate at the hearing part of the examination.

- Attending examination
- Written representation

B7. Name:

Signature: **Date:**

Thank you for taking the time to make a representation.