

## **Travellers' Sites Development Plan Document**

### **Main Issues Statement**

#### **Issue 4 – Questions (i to v) (Document Number 1.4)**

#### **Issue 4 –**

**Are the criteria based policies TS1 and TS2 necessary and are they fair in facilitating the traditional and nomadic life of travellers whilst respecting the interests of the settled community?**

**Question (i) Given that Policy H4 of the Core Strategy sets out when proposals for traveller sites will be supported and the other general policies in the Core Strategy, are Policies TS1 and TS2 necessary?**

#### **Response**

- 4.1 The purpose of including policy TS1 was to provide greater clarity about factors that would assist in gaining planning approval in relation to the design of sites. As they are often in rural areas the approach to landscape design is a particularly important factor in achieving planning permission.
- 4.2 A separate policy on TS2 was included to highlight the requirement for travelling show people sites and it is intended as an enabling policy. It was drafted with regard to the Showmans Guild planning advice and attempted to reflect the different requirements of these sites compared to other traveller sites.
- 4.3 Policies TS1 and TS2 identify the key issues in the DPD that require consideration in relation to the development of sites as the DPD will be the first point of reference for travellers and it was considered that this would help make the document more accessible to all sectors of the community.

**Question (ii) Are similar provisions applied to other forms of development that are limited in the countryside according to Core Strategy Policy RA3 and are criteria 1 – 12 fair and reasonable?**

#### **Response**

- 4.4 Forms of development which are proposed to meet the criteria of Policy RA3 will be required to comply with the other general policies of the Core Strategy. In addition, such proposals will also need to comply with the policies set out in neighbourhood plans or those which will be incorporated within the emerging Herefordshire Rural Areas Sites Allocation Plan (which covers the areas where the parishes are not producing a neighbourhood plan). For information, at time of writing there are 110 neighbourhood areas defined in Herefordshire and 35 adopted neighbourhood plans.
- 4.5 Again as stated in response to the previous question the intention of the policies was to provide clarity and certainty and are considered to be fair and reasonable. Some of the issues included are specifically associated with Traveller Sites and it was considered that the policies would positively encourage appropriate development proposals. However if the Inspector is of the view that a modification to the policy would be appropriate, then the Council would be agreeable to request such a modification.

**Question (iv) Why are the first paragraphs of Policies TS1 and TS2 different to one another? In the interests of effectiveness should it be made clear that development will be supported rather than encouraged and given the identification of a need for plots for show people is this reference in Policy TS2 superfluous?**

#### **Response**

4.6 The use of the word encouragement in TS2 reflects a need for the council to work proactively with Showpeople to bring sites forwards in the absence of any allocation of sites for this use. This approach was agreed with the Travelling Showmans Guild. However if the Inspector is of the view that a modification to the wording would ensure a greater consistency between the policies, then the Council would be agreeable to request such a modification.

**Question (v) In Policy TS1 does criterion 12 overlap with site licensing requirement, why should an on-site shared community building is explored in every case and why should details of animals to be kept at the site be provided? The latter would appear to encompass domestic pets and use of land for grazing is a separate matter.**

#### **Response**

4.7 TS1 criterion 12 –We accept that there is some overlap with site licensing requirements and therefore the Council has included this deletion in its further recommended minor modifications.

4.8 The inclusion of reference to an on-site community building arose from discussions with Herefordshire Council officers who work directly with the traveller community. They were aware of examples of good practice site design elsewhere in the country where an on-site community building had been built. This not only had advantages for those living on site as an additional resource but also offered the potential to be shared with the wider community thus making good use of resources as well as encouraging the fostering of good relations with settled community as advocated in both PPTS and Core Strategy policy H4. However it is recognised that it would not be appropriate to include this as a mandatory requirement, hence the reference to the opportunity to be explored. Therefore, on reflection, it is considered that this type of reference may be more appropriate in the text rather than in the policy and therefore a minor modification is included to this effect. Obviously the provision of such a building would incur additional costs and may therefore not be viable but if there is an area where there is an identified shortage of community facilities it may be appropriate.

4.9 The inclusion of reference to the keeping of animals was first considered at the Issues and Options stage. It was not taken forward then as it was considered that this was covered by controls outside planning. However the sustainability appraisal July 2016 considered it to be a relevant issue as it will impact on the site requirements, for example if grazing areas is required. Therefore it was included in the pre-submission version of the plan. However it is agreed that this is potentially misleading and is not intended to apply to domestic pets. The

real issue relates to the requirement of grazing and therefore the policy requires amendment to reflect this and a further minor modification has been included to this effect.

**Question (vi) In Policy TS2 is criterion 1 necessary as a site is unlikely to be selected that would not meet the accommodation and storage requirements of the intended occupiers? Why should any site have suitable access to the strategic road network as required by criterion 3? Does criterion 6 overlap with site licensing requirements?**

### **Response**

- 4.10 On criterion 1, the requirements of Travelling show people in terms of sites is different to that of other travellers. This is mainly because of the requirement to have sufficient land to accommodate equipment on the same site for reasons of security and convenience for maintenance. We were advised by the Guild that often the particular requirements of Showpeople are overlooked and therefore we considered it important to make the distinction between the different site requirements within the DPD. This approach has been supported by the Guild in our discussions with them. The specification of sufficient space for both living, and manoeuvring and storage of equipment is therefore important as it will ensure the provision of viable sites.
- 4.11 Turning to criterion 3, the reference to strategic road network reflects the wording in the Herefordshire Local Transport Plan Strategy (Post Submission Document PS6 page 36) and is intended to reflect that there should be good access to the strategic routes which would be more suitable for transporting equipment between venues. The wording is intended to avoid locations where the road network may not be suitable for this type of use. The strategic routes identified in the Local Transport Plan includes trunk roads, and both 'A' and 'B' roads.
- 4.12 Finally, when it comes to criterion 6, this was included with reference to the Showman's Guild Planning Focus Model Standard Package (Post Submission document PS7). However it is accepted that there may be overlap with site licensing requirements and therefore a minor amendment is suggested to remove this criterion.