

Herefordshire Local Plan - Travellers Sites Development Plan

Proposed approach to finding additional sites to meet Five Year Requirement:

- 1.1 Table 5.1 of the Gypsy and Traveller Accommodation Assessment has been amended following the hearing sessions and now shows a five year requirement for 52 pitches for all travellers. The requirement for those travellers meeting the definition in Annex 1 of the Planning Policy for Traveller Sites (**PPTS**) is 19. The submitted DPD identifies 9 pitches. The inspector recommends an annual turnover rate of 1 pitch per year which will contribute to supply. These two elements provide a supply of 14 pitches leaving a remaining 5 pitches to be identified. The Inspector has advised that for the DPD to be sound the question of pitch provision for the first 5 years of the plan period cannot be deferred
- 1.2 The Inspector has asked the Council to consider the approach it will take to identify these additional pitches. In his post hearing advice the Inspector referred to a number of approaches to achieving this as follows:
- re-assessing previous sites put forward; giving greater attention to the provision of private sites;
 - re-visiting the potential to expand existing sites;
 - considering the use of formerly unauthorised sites that have now been vacated
 - undertaking a further call for sites.

The Council has considered all these options and this response outlines our preferred approach and explains why some of the suggestions have not been taken forward.

- 1.3 In summary the Council's proposed approach is to assess the potential for additional pitches on two existing private sites identified through the GTAA update 2017 (Submission Document A13) as having potential for additional pitches and which are considered to be deliverable having regard to the guidance set out in footnote 4 to paragraph 10 of PPTS. In addition the council has received a proposal for additional pitches at another site in the County which is also currently being assessed.
- 1.4 An initial desk top assessment of these three sites and a review of their planning history indicate that at least two of these sites could be deliverable and there appear to be no significant constraints that would prevent their development. It is considered at this stage that the potential supply from a combination of two or more of these sites could achieve the requirement for the five year supply of pitches. However a more detailed assessment of the sites is required, particularly in relation to highway impact. Further public consultation will then be carried out on proposed additional pitches.

Summary of response to suggested approaches:

a) Further expansion of local authority pitches:

- 1.7 A comprehensive review of the all the existing local authority sites was undertaken during the preparation of the DPD to determine potential for increasing the number of pitches either within the existing site boundaries or as extensions. This concluded that there is potential for a further 9 pitches on the local authority sites and these are incorporated into the DPD. Various factors were taken into account during this review and these were as follows:

- **Physical capacity within the site to accommodate additional pitches and associated vehicle movements.** Although it was suggested that underused play areas could be redeveloped as pitches, this was not considered appropriate as even if they are currently underused it was considered that they should be retained as an amenity for the future. It was also considered that existing established landscape screening should not be compromised.
- **Ownership and availability of adjacent land.** Not all of the sites are adjacent to land in the Council's ownership or were suitable for further extension given adjacent established uses which would be incompatible with use as a traveller site.
- **Site management issues.** The allocations of the additional pitches was carried out in discussion with the Council's Site Management Team and with the Gypsy and Roma Strategy Group as appropriate. Each site was considered individually but it was generally agreed that it is preferable for sites to not exceed 10 -12 pitches. Larger sites tend to create more challenges in terms of site management and undue pressure on local authority resources. Whilst the preferred number of pitches on each site will vary according to the particular circumstances of individual sites, given the constraints referred to above it was not considered that the number of pitches should exceed the additional 9 pitches that have already been identified.

- 1.8 The Council has reconsidered the approach to existing sites, but has concluded that there has not been any change in circumstances that could justify an increase in the number of pitches on local authority sites over and above those that are already allocated. The potential for additional pitches at Pembridge was discussed at the hearing sessions. The Council remains of the view that although the site is large enough to cater for an increase in the number of pitches, the additional pressures in terms of the management of the site mean that this is not a desirable option.
- 1.9 A further key consideration in relation to providing additional local authority pitches is the availability of funding which impacts on deliverability. Funding has been awarded through the capital programme process for the provision of the 9 allocated pitches. There is currently no identified funding for further pitches, and given the other demands on the Council's resources, there is currently no reasonable prospect of further funding becoming available. Furthermore PPTS at paragraph 4.e. refers to the need to promote more private traveller site provision. Accordingly, the emphasis should be on seeking to identify additional private pitches.
- 1.10 Therefore it is concluded that, at this stage, there is no further potential for additional pitches on local authority sites other than those already allocated in the DPD and the emphasis should be on identifying additional private site provision.

Expansion of other private authorised site identified in the GTAA update.

- 1.11 Three sites were identified in the GTAA 2017 update by the occupants as having potential for additional pitches. Two of these three have been taken forward for further investigation as outlined in paragraph 1.4 (Sites A and B). The third site has recently been granted planning permission for an additional two pitches and therefore has not been included.

Call for sites to identify further new or expanded / intensified private sites

- 1.11 During the process of the DPD preparation, three call for sites have been undertaken which have yielded relatively little response. Unlike other forms of housing accommodation it

would appear that there may well be a reluctance to put sites forward through the plan making process. Furthermore if an additional call for sites was carried out this would have implications for the timescale for identifying suitable sites. A six week period would be considered the minimum reasonable to allow for sites to be submitted to the Council. Depending on the number of sites received it is likely to take a minimum of a further three weeks to assess the sites for their suitability as this will involve liaison with technical specialists within the Council. If there are implications that require consultation with other consultees then this will extend the process further as any response will be dependent on their timescales. Taking all of this into account and given that there is the prospect of meeting the shortfall through the sites identified at paragraph 1.4, the Council is of the opinion that it would not be a productive exercise to undertake a further call for sites at this stage.

- **Revisit sites formerly considered at preferred options stage**

1.12 Two additional sites were included in the preferred options stage of the DPD process but these were not taken forward into the submission DPD partly because there at the time these were not considered to be required to meet the identified pitch requirement and also had unresolved issues associated with them. These were:

- Sutton St Nicholas – the indications are that this site could be prohibitively expensive to develop because of its distance from existing services. In addition, the access road to the site is approximately 220 m long which also adds significantly to the cost of developing the site impacting on its viability.
- Trumpet – There were outstanding issues in relation to achieving safe highway access and pedestrian connectivity. The owner of the site did not provide evidence to resolve these issues which means that there remains an unacceptable level of uncertainty when it comes to site delivery.

- **Sites that were received during earlier call for sites but were ruled out**

1.13 A review of these sites has indicated that there is no potential for any of these to be brought forward into the local plan process. The reasons are as follows:

- Ridge Hill: A concurrent planning application was being considered by the Council which was refused against the officer recommendation. The applicant appealed this decision but the appeal was dismissed on a number of grounds. Whilst one of these related to the traveller status of the applicants, the Inspector also cited landscape issues and the suitability of the location in relation to sustainable transport as reasons for the dismissal.

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=141687&search=ridgehill

- Storrige: This was the subject of a planning application (P152685/F.) subsequent to its submission to the call for sites process. The planning application was refused on grounds of negative impact on the AONB and access / highway issues. A revised planning application for one pitch currently being considered. Details of this can be found here:

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=141687&search=storrige

[tion_search/details?id=173814&search=173814](#) I understand from the case officer that this application will be refused under delegated powers for reasons of highway safety and impact on the AONB.

- Wigmore - two single pitch sites separated by a field were granted planning permission on appeal. Additional pitches were suggested as an infill type of development. However an intensification of the site was not considered to be suitable due to highway capacity issues and the impact upon the landscape setting of Wigmore Castle, a Scheduled Monument.
- Site at Trumpet. (a different site referred to in paragraph 1.12) It is understood that this site is being developed for holiday units under an existing planning permission.

Previous unauthorised encampments:

1.14 The council’s records show a number of sites were previously occupied by unauthorised encampments that are no longer in use. Many of these have now been vacant for a considerable period of time and therefore do not have a recent history of unauthorised use. An initial review of these does not show any potential for use as traveller sites for various reasons including their redevelopment for other uses. It is understood that historic encampments occurred on farms when travellers were employed as agricultural workers but this connection no longer exists. Furthermore none of these sites were put forward through the call for site processes and therefore there is no evidence that these sites can be considered available.

Timescale

1.15 The Inspector indicated in his post hearing advice that further consultation may be needed if new sites are identified. If the further technical assessments are carried out and the additional pitches are proposed as allocations it is considered that a six week consultation period should be carried out for new pitches on existing site as well as for a new site. Sustainability Appraisal and Habitats Regulations Assessment should also be carried out prior to this. The Council’s governance process would also require approval from the Cabinet Member. This results in the following indicative timeframe for the process.

Completion of site assessment including HRA / SA process	September 2018
Public consultation	October to mid-November 2018
Analysis of consultation findings	End November 2018
Report findings to Inspector	December 2018
Main Modifications consultation	January 2019
Inspectors Report	March / April 2019
Adoption of Plan	Spring / Summer 2019

Approach to longer term requirement for pitches

1.16 Revised table 5.3 shows a requirement for an additional 11 pitches to be provided between 2023/24 to 2030/31. The Council has sought clarification from the Inspector as to whether it would be appropriate to allow for turnover of one pitch per year for this time period. The Inspector has advised that to be robust the Council should omit the turnover allowance of 1 pitch per year from 2023 to 2031. This is because over that period it is quite possible that

the family circumstances of those in bricks and mortar will change and they may become in need of a pitch. This would effectively 'cancel out' any gain in pitch provision from families moving in the opposite direction.

- 1.17 At this stage it seems unlikely that the Council will be in a position to identify sufficient sites for the period between 2023/24 and 2030/31. Therefore the Council is of the view that the most appropriate way to address this longer term requirement is to identify sites through the review of the Core Strategy. The Inspector has agreed to this approach and therefore work will commence on identifying the further 11 pitches as part of the Core Strategy Review which is scheduled to start in summer 2019.